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# ALASKA BOARD OF FISHERIES

## Work Session

Anchorage | October 29-30, 2024

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**Submitted By:** Virginia Adams  
**Organization:** J&V Fisheries Inc  
**Community of Residence:** Kodiak

**Comment:**

ACR #14

My name is Virginia Adams. My family and I have fished set gillnet on the West side of Kodiak for 45 years in our location in Viekoda Bay [REDACTED]. We have a 3 permit operation. We are advocating for ACR #14. We have used the "Joint Venture" tool in the past and it is helpful. We believe it was an oversight at the Jan 2024 BoF meeting in Kodiak not to include this when the Board passed an additional 25 fathoms of set net gear per permit. This should of course be included in any operations wishing to use the joint venture tool. It does not add anymore gear to the water, just gives multi permit operations flexibility in how many nets they fish. This should have been taken care of at the Jan 2024 meeting, and should not wait for another Board cycle for Kodiak and should be dealt with as an ACR.

ACR #15

As a multi permit set net operation fishing for the past 45 years on the West Side of Kodiak, this latest requirement to separate fish by permit, as well as having permit holders present to deliver their fish, is unreasonable. Not only unreasonable, but unsafe. We have always combined our fish and deliver on 1 permit per delivery. ACR #15 will give the opportunity for the Board to hear all that is involved relative to such a regulation requiring separation of fish per permit etc.



ALASKA SALMON ALLIANCE  
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PC2

**October 13, 2024**

State of Alaska Board of Fisheries  
c/o ADFG Board Support  
PO Box 115526  
Juneau, AK 99811

**Re: Comments on ACR 4, 5, 6, 7, and ACR 8**

Dear Board of Fish Members,

The Alaska Salmon Alliance is a nonprofit organization comprised of commercial seafood processors, allied businesses, and fishermen. We focus on public education and promoting the value of scientifically based salmon management to preserve habitats and create predictable harvests for all salmon users in the Cook Inlet region. Our goal is to create long-term economic opportunities and benefits for Alaska's coastal communities for future generations.

We want to express our concerns and provide input on the current state of commercial fishing gear regulations and their impact on fisheries in Upper Cook Inlet, particularly relating to the East Side Setnet (ESSN) fishery. Several ACRs submitted address the current situation.

Over the past few years, harvest opportunities have disappeared, largely due to the low abundance of king salmon and the designation as a stock of concern. This has led to increasingly stringent restrictions on the setnet fishery.

In the 2024 salmon season, experimental gear types such as dip nets and set beach seines were introduced, authorized, and operated with a verifiable and minimal impact on king salmon populations. These alternatives allowed for some level of fishing opportunity without exacerbating conservation challenges. However, the ongoing restrictions on the setnet fishery have resulted in massive over-escapements of sockeye salmon in both the Kenai and Kasilof rivers, as efforts to protect king salmon have reduced the ability to manage sockeye runs effectively. Escapements well beyond the target goals pose serious long-term conservation concerns for both the sustainability and yield of these sockeye stocks.

It is generally accepted that the low abundance of king salmon is primarily due to poor ocean and environmental conditions, not the result of setnet fishing gear. Despite this, the ESSN has faced the most significant restrictions, severely limiting economic opportunities for fishermen, processors, support industries, and coastal communities. These limitations have caused profound damage to the local economy and have resulted in substantial losses in potential sockeye harvests, with millions of fish going unharvested and into the rivers well above management targets.

Although not ideal, we support efforts set forth in ACRs 4 through 8 to allow some level of harvest while minimizing the take of king salmon and providing some measure of financial stability for those in the fishing industry. These alternatives would also help keep sockeye escapements toward target ranges. However, it is critical that these alternative gear types are only used during the stock of concern status. Once king salmon stocks recover, historical methods and means of harvesting should be re-implemented.

It is important to recognize that all businesses require some level of predictability in order to plan for labor, materials, and transportation. The seafood industry is no different. Without a clear path toward restoring traditional shore-based harvesting in Upper Cook Inlet, we risk further damaging the local economy and the health of our fisheries. The loss of this traditional fishing sector has already resulted in severe economic losses for harvesters, the processing sector, and the Kenai Peninsula's coastal communities.

The over-escapement of sockeye salmon in recent years represents a dual concern: both an economic loss and a conservation challenge that may impact future yields. In light of this, we strongly urge the continued development of harvest opportunities for the shore-based sector, with the understanding that the long-term goal must be to return the fishery to historical levels of opportunity, economic viability, and harvesting power. This is essential not only for the fishermen and industry but also for the health of our rivers and ecosystem.

Thank you for considering our input. We urge you to use these concerns to guide future discussions and decisions that will support both the long-term sustainability of our fisheries and the livelihoods of the communities that rely on them.

Respectfully,

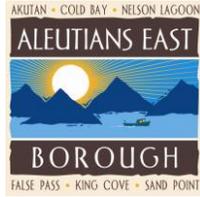


Mike Simpson, President  
Alaska Salmon Alliance



Norm Darch, Executive Director  
Alaska Salmon Alliance

Cc: Senator Jessie Bjorkman  
Representative Ben Carpenter  
Representative Rebecca Himschoot  
Representative Justin Ruffridge  
Senator Bert Stedman  
Senator Gary Stevens  
Representative Louise Stutes  
Representative Sarah Vance



October 15, 2024

Alaska Board of Fisheries  
Art Nelson, Executive Director

Re: Aleutians East Borough Support for Board of Fisheries Policy for Changing Board Agenda and ADF&G Staff Comments on Agenda Change Request #13

The Board of Fisheries has spread general fishery topics for discussion over a 3-year meeting cycle, providing some regularity to fishery stakeholders to count on when issues of interest will be discussed, and allowing fishermen to attend a limited schedule of meetings that pertain to their interests. The Board also allows for agenda change requests (ACRs) at the beginning of each meeting cycle, that may be accepted if the request adheres to Board policy<sup>1</sup>:

*“The board will accept an agenda change request only for a fishery conservation purpose or reason; to correct an error in a regulation; or to correct an effect on a fishery that was unforeseen when a regulation was adopted.” And “the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information found by the board to be compelling.”*

The Aleutians East Borough (AEB) supports the practice and use of the 3-year meeting cycle and also support the Board of Fisheries Policy on changing the Board agenda. ACR #13 does not meet the Boards own policy for accepting ACRs. Also, ACR 13 is clearly allocative, and lacks compelling new information. We believe this out-of-cycle proposal would be appropriately submitted for the next meeting cycle that includes South Alaska Peninsula fisheries.

The AEB also agrees with ADF&G Staff Comments<sup>2</sup>. Staff comments describe some of the work that South Alaska Peninsula salmon seine gear fishermen have initiated to avoid chum salmon, especially in June which would be of the most benefit to Arctic, Yukon and Kuskokwim (AYK) chum salmon returns. The stated rationale in ACR 13 does not account for significant strides and sacrifice the seine fleet has taken to reduce chum harvest in June. South Alaska Salmon fishermen do share in the burden of conservation of AYK salmon. To get the full picture, it is important to look at recent Board and fishermen actions.

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<sup>1</sup> Board of Fisheries policy for changing Agenda, [https://www.adfg.alaska.gov/static-regulations/regprocess/pdfs/acr\\_policy.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/pdfs/acr_policy.pdf)

<sup>2</sup> [ADF&G Staff Comments on ACRs, https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/ws/adfg-comments.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/ws/adfg-comments.pdf)

At the most recent in-cycle meeting in February 2023, the Board was very responsive to concerns heard from all stakeholders and took several actions in the South Peninsula June fishery including: closing the entire Sanak Island Section to all gear types in June, further restricting the first two fishing periods for seine gear, and establishing chum harvest triggers for seine gear (based on harvest from all gear types) in tandem with an adaptive fleet-management program. This program has been formally in place for two years (2023, 2024) but informally since 2021. Results of this program show that fishermen, in cooperation with ADFG, can successfully reduce chum harvest while optimizing sockeye, as demonstrated by the marked reduction in chum harvest relative to sockeye harvest compared to the 10-year average. This program has been an unprecedented model of how cooperative management can leverage “real-time, on-the-ground” knowledge from fishermen to achieve the shared goal of conservation without sacrificing their livelihoods as collateral damage. The Board should be extremely proud of the action they took at the in-cycle meeting, and it is clear their actions have produced the intended results and should be allowed to continue until the next regular in-cycle meeting where it can be fully reviewed.

The Aleutians East Borough boundaries include the majority of the Alaska Peninsula salmon fishing areas and the communities of King Cove, False Pass, Sand Point, Nelson Lagoon, Akutan and Cold Bay. We urge the Board of Fisheries to not accept ACR 13, that does not meet the Board's criteria, would not solve any problem but would create additional economic hardship on the South Peninsula salmon seine fleet and AEB communities. The AEB supports the work the South Peninsula seine fleet is practicing to conserve struggling fish stocks and provide for sustainable fisheries statewide.

Sincerely,



Alvin D. Osterback, Mayor

Dear Board of Fish Members,

**I am writing in support of ACR # 14 and ACR # 15.**

I am a Kodiak setnet permit holder. My family and I have been fishing in Uganik Bay, Kodiak AK since 1979.

For ACR # 14, I fished a joint venture with my son for a number of years at our site on the Shelikof at Midnight Cove, just inside of Cape Ugat. We own the property at Cape Ugat and plan to fish a joint venture there again at some point. The ability to use three longer sets rather than 4 is a big advantage, particularly in light of the Sea Lion population in the neighborhood.

It is important to fix this now through an ACR rather than wait until the next board cycle because until then anyone wanting to fish a joint venture in the central section of the NW Kodiak district will lose the opportunity to fish 50 fathoms that everyone else has.

This is not adding more web to the water because all permit holders are already allowed the full 175 fathoms.

For ACR # 15, We currently have only one permit in the family, but as the grandchildren get older we plan to fish a second or third permit. It's an imposition to keep all our fish separated on one holding skiff and to have every permit holder signing tickets at the tender, particularly in rough weather. It's not only an inconvenience, it's dangerous during deliveries on the Shelikof.

We are not asking for anything special. We are just trying to maintain our way of life.

Thank you for your consideration.

Sincerely,

Robert and Christy Allen

**Submitted By:** Shayla Anderson  
**Community of Residence:** Kenai, Alaska

**Comment:**

My name is Shayla Anderson. I am a fourth generation fisherman and am proud to work alongside my parents, [REDACTED], along with my husband and 3 children. My Great Grandfather began fishing in Cook Inlet with Fish Traps and transitioned to Set Netting when Traps became outlawed. I grew up fishing with my Grandfather and unfortunately didn't get the opportunity to meet my Great Grandfather, who I would consider a pioneer to our Cook Inlet fishery. Both my Great Grandfather and my Grandfather evolved with the fishery that they knew best.

There was an article published in the Peninsula Clarion on July 31st, 2024 titled, 'Evolve or die' <https://www.peninsulaclarion.com/news/evolve-or-die/> and I believe that our fishery IS evolving just as my Grandfathers did over the last 100 years. .

I, along with my husband and children, SUPPORT ACR 8 and believe that this method of using a Set Beach Seine was unforeseen at the 2024 Upper Cook Inlet Board of Fisheries Meeting. Therefore, it meets the ACR Criteria to have further discussions outside of our Upper Cook Inlet cycle.

I hope that the Board will see that ACR 8 provides new information that was not available at the 2024 Board of Fisheries Meeting and chooses to have further discussion prior to our 2025 season opening.

Sincerely,

Shayla, Sam, Sophia, Ava and William Anderson  
[REDACTED]

**Submitted By:** Donna Anderson  
**Community of Residence:** Kenai, AK

**Comment:**

Board of Fisheries,

This letter is in support of ACR 9 and 10.

ACR 9 addresses the issue of a predator, rainbow trout, decimating the salmon species in the Kenai River. Rainbow trout feed year-round on salmon fry. At some point, a conversation about the impact rainbow trout have on the decline of all salmon species needs to be addressed. Now is the time. Harvesting rainbow trout will have the largest and fastest impact on the conservation of all salmon species in the Kenai River.

ACR 10 addresses the discriminatory effects of eliminating bait fishing. Bait fishermen, typically the elderly, disabled, disabled veterans, and children, are not decimating the salmon species. (SEE ACR 9!) In March, the BOF was presented with false claims of "traditional fishing." The lack of public knowledge about Proposal 167, before it became regulation, is also concerning.

Thank you for your time and efforts in correcting this discriminatory regulation.

Sincerely,

Donna M. Anderson

**Submitted By:** Margie ANDERSON

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**To: Board of Fisheries Work Session****October 29-30, 2024**

Location: Anchorage

From:

Erik Anderson



Palmer, AK 99645

To the Board of fisheries respectively,

I am commenting on the proposed regulation change stated as “5 AAC 21.382. Kenai River late-run king salmon stock of concern management plan” and the proposed change under “ACR 8 - Add set beach seine nets as legal gear under the Kenai River late-run king salmon stock of concern management plan (5AAC 21.382).”

This proposed gear change amendment is unnecessary and not feasible as an alternate means to harvest excess sockeye bound to the Kenai River, as required and legally allowed by Alaska state law.

This gear experiment was only done by one applicant throughout the entire East Side set net fishery. The applicant used two different sites... oje in Kasilof and one in Salmantof. It was only observed one time in Salamantof. According to witnesses of the attempt at seining and many other commercial set net operators curious to the experiment, the consensus amongst all groups is that this type of fishery would be expensive, slow, and counter productive to the fishery. Each time the seine was deployed it took extra gear, not to mention the extra cost of having to buy longer, more expensive nets than a traditional set-net if this amendment wee to become law. Also, most people outside the set-net fishery don't understand is that set-nets rarely touch bottom – they're not designed to and when they are, they aren't fishing and catching any fish. Beach seining is in essence dragging the net to shore to hopefully release any bycatch, and obviously dragging it to shore requires it to be be drug along the sea floor. I believe the consensus statewide with all commercial fisheries is that we do not accept any type of ocean floor dragging for fish. Also, the process is very slow and when witnessed at the Kasilof site, it took large excavator equipment to actually tow the net to shore. In the 70s and 80s all the commercial operators upgraded to tractors. Most of these same tractors are still operational today. But no tractor bought o support a set net site is powerful enough to consistently drag a heavy net, a net almost twice the size of the traditional set nets, and often times through mud, to shore in hopes to salvage any valued sockeye while discarding any and all bycatch unharmed. It's ironic to me the only permit given for this

alternate experiment was to the mayor of Kenai and the site in Salamantof he used was that of a seasonal non-resident. Why he couldn't ask a local to participate or at least observe is somewhat disheartening but more so appalling.

I have been involved with the East Side Set Net fishery for over 25 years. I am an Alaskan resident. My family is of Alaskan Indigenous decent. Even my commercial fisherman father- in-law who started this operation....84 years old, is still involved. I have witnessed all sorts of operations and the absolute most safe, most efficient, and most fair operation in regards to catching abundant excess salmon, and also the safest operation for the fisherman and also a fair chase opportunity to them as well is the tradition set-net....45 meshes deep, or if reduced 29 meshes deep, by (X) 35 fathoms in length, not more than 2 nets per permit, Mondays and Thursdays 12 hour periods each day based off tide times, and not more than 36 hours per week extra time based on abundance....as it has been and been proven to be successful and manageable.

In order to increase Kenai River king salmon abundance, as the reason for these regulations, the board must acknowledge an increase of in-river fishing pressure by over 400% with just sportfisherman, in the last 30-40 years. They must also acknowledge the East Side Commercial fleet has been reduced and restricted more and more and more over time yet the in-river pressure within the spawning areas has significantly increased, respectfully. And also please acknowledge that most in-river fishing is sport fishing and sport fishing is intended for fun. State commerce with commercial fisheries especially as managed with abundance of sockeyes on certain years, should and should always should be dedicated to the commercial operators permitted by this state 1<sup>st</sup>.

Thank you for your consideration in voting "NO" on ACR 8 of this sessions agenda modification. Dip nets are actually better with significantly less net in the water.

Thank you and sincerely,

Erik Anderson



**Comment of Area M Seiners Association on Agenda Change Request 13  
October 14, 2024**

The Area M Seiners Association submits this comment on Agenda Change Request (ACR) 13, which was submitted by the Western Interior Regional Advisory Council. ACR 13 seeks to reduce commercial salmon seine depth and length in the Alaska Peninsula area (5 AAC 09.332).

The ACR asks the Board of Fisheries to consider this out-of-cycle change to address concerns about insufficient Yukon and Kuskokwim chum and chinook runs. However, the ACR does not meet Board policy for agenda change requests. Under 5 AAC 39.999(a)(1), the Board will, in its discretion, change its schedule for consideration of a proposed regulatory change in response to an agenda change request only for **a fishery conservation purpose or reason, to correct an error in a regulation, or to correct an effect on a fishery that was unforeseen when a regulation was adopted.** The Board will not accept an ACR that is predominantly allocative in nature in the absence of new information found by the Board to be compelling. 5 AAC 39.999(a)(2). These limitations on ACRs reflect “the importance of public participation in developing management regulations” and the Board’s recognition that “public reliance on the predictability of the normal board process is a critical element in regulatory changes.” 5 AAC 96.625(e).

ACR 13 is very similar to a previous ACR (ACR 3) proposed in 2023 by the same entity (the Western Interior Regional Advisory Council). 2023 ACR 3 sought to amend 5 AAC 09.332 to reduce seine net depth in just the Southwestern and Unimak Districts of Area M from 375 meshes to 250 meshes, whereas 2024 ACR 13 seeks to reduce seine depth to 325 meshes and limit the aggregate length of seine and lead to 250 fathoms. The Board declined to take up 2023 ACR 3 and consider Area M seine net changes at an out-of-cycle meeting last year, and should decline to take up ACR 13 this year.

Numerous proposals regarding alleged Arctic-Yukon-Kuskokwim (AYK) chum interception by the Area M fisheries were put forward and exhaustively debated at the Board of Fisheries February 2023 meeting. Proponent had the opportunity to suggest changes to Alaska Peninsula seine nets as part of the regular Board cycle for consideration at the February 2023 meeting. Proponent failed to do so.

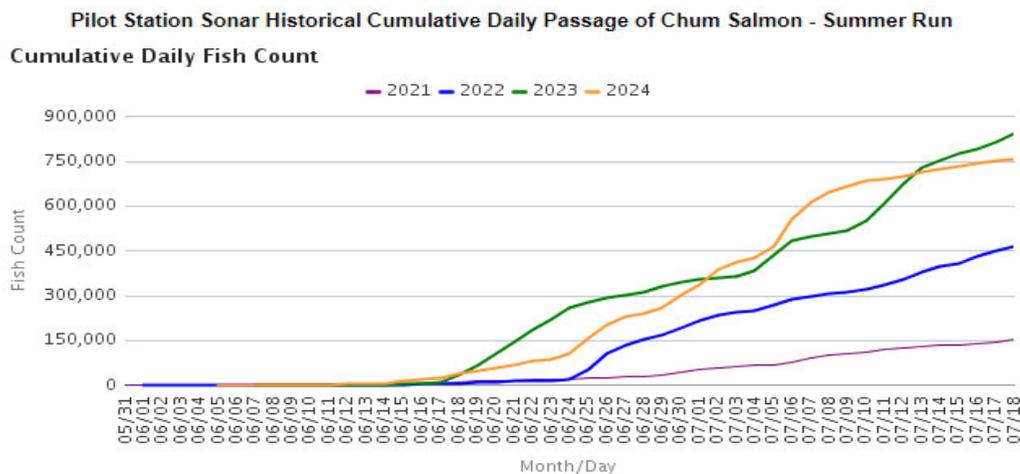
We must clarify a common misconception the ACR proposer asserts that Area M seine nets are longer and deeper than any other area. Alaska Peninsula (and Chignik, *see* 5 AAC 15.332) maximum seine net depth is 375 meshes, whereas Southeast Alaska maximum depth is 450 meshes, 5 AAC 33.332(a). The maximum length of an Area M seine net is 250 fathoms, same as Cook Inlet, 5 AAC 21.332, and Kodiak, 5 AAC 18.332. Although 5 AAC 09.332 currently allows addition of a lead up to 150 fathoms, in practice leads have been phased out of the fishery due to high cost and minimal effectiveness. There are zero seiners in the Area M fleet using leads at this time; everyone is using 250-fathom-length nets only. There is no reason for an out-of-cycle ACR to limit Area M net length to 250 fathoms when it would have no practical effect whatsoever.

Furthermore, the Board should decline to hear an allocative proposal out-of-cycle when there is no new information that was not considered by the Board at its February 2023 Alaska Peninsula meeting. ACR 13 is predominantly allocative in nature. 5 AAC 39.222(f)(1) defines “allocation” as it is used in the sustainable salmon policy to mean “quotas, time periods, area restrictions, percentage sharing of stocks, and other management measures providing or limiting harvest opportunity.” Clearly, ACR 13 involves allocation as it proposes reducing seine depth and length for the express purpose of limiting harvest opportunity in Area M.

ACR 13 on its face asserts that “increased in chum interception in the [South Unimak and Shumagin Islands June] fishery” is traceable to “huge changes made in regulations for the area *in*

2004”—which is 20 years ago. Accordingly, ACR 13’s proposer cites no new information or concerns about insufficient Yukon and Kuskokwim chum runs to warrant out-of-cycle consideration of this ACR. Rather, Yukon & Kuskokwim summer chum escapement increased in both 2023 and 2024 as compared to 2022 and subsistence harvest opened on both the Yukon and Kuskokwim in 2023 and 2024.

ACR 13 asserts that “[t]he [June] fishery has averaged 677,232 chums per season over the past five years, the highest five-year average in decades, while chum stocks in the AYK region are struggling to even meet escapement goals.” However, the documented 2024 estimated chum harvest in the June fishery (South Unimak and Shumagins) is 423,714,<sup>1</sup> and 2023 chum harvest was 205,522<sup>2</sup>—both of which are well below the five-year average claimed by ACR 13. The Yukon River summer chum stock escapement in 2022 was 463,806, while in 2023 and 2024, summer chum escapement was 845,988 and 757,817, respectively<sup>3</sup>:



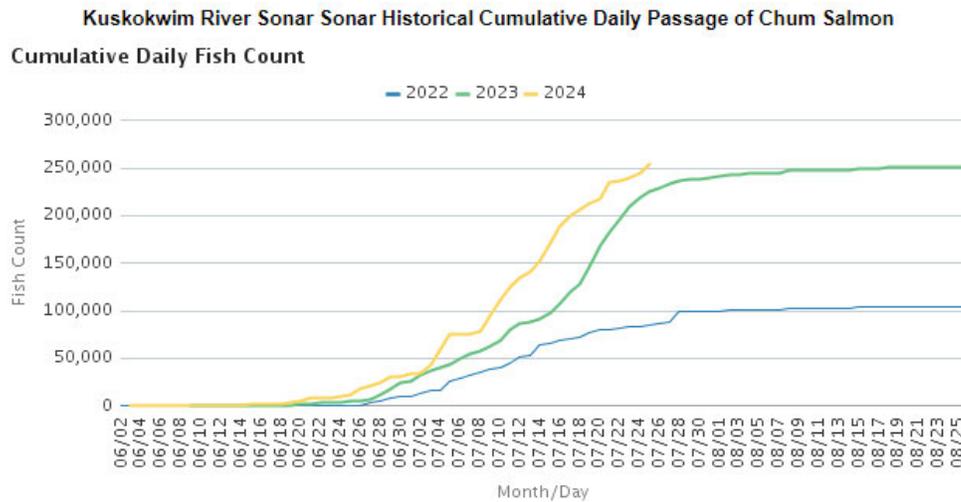
<sup>1</sup> <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaakpeninsula.salmonharvestsummary>

<sup>2</sup> ADF&G, 2023 Alaska Peninsula and Aleutian Islands Salmon Season Summary at 5, available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1556105316.pdf>

<sup>3</sup> Graph source:

[https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareayukon.salmon\\_escapement](https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareayukon.salmon_escapement).

In 2023, and 2024, the Yukon summer chum run was well within the ADF&G escapement bounds of 500,000 to 1.2 million.<sup>4</sup> Due to the higher escapement, summer run chum subsistence salmon fishing was open in Yukon districts 1-4 and 5 ABC in summer 2023 and 2004.<sup>5</sup> Kuskokwim chum returns also rebounded in 2023 and 2024<sup>6</sup>:



Subsistence and commercial fishing were open on the Kuskokwim in 2023 and 2024.<sup>7</sup> Thus, the situation has improved significantly for chum in the last two years and there is no new evidence

<sup>4</sup> Additionally, the summer chum run in both 2023 and 2024 showed relatively late timing. ADF&G believes that the 2023 total run size was “likely somewhat larger” than the 845,988 counted at Pilot Station as of July 18, because “[g]enetic MSA in 2023 indicated that summer chum salmon continued to pass the Pilot Station sonar beyond the administrative summer season cutoff date of July 18. In 2023, 73% (with a CI of 65% to 85%) of the chum salmon arriving from July 19 to July 31 at Pilot Station sonar were genetically summer chum salmon. Overall, an estimated 9% of the summer chum salmon run came in during the fall season.” ADF&G, *2023 Yukon River Preliminary Summer Season Summary*, available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1548184795.pdf>

<sup>5</sup> ADF&G, *2023 Yukon River Salmon Summer Fishery Announcement #23* (July 11, 2023), available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1506817489.pdf>; ADF&G, *2024 Yukon River Salmon Summer Fishery Announcement #24* (July 16, 2024), available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1609155214.pdf> (2024)

<sup>6</sup> Graph source: <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareakuskokwim.emihd>

<sup>7</sup> ADF&G, *Kuskokwim River Fishery Announcement #4* (Aug. 12, 2023) available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1528358401.pdf>; *Kuskokwim River Fishery Announcement #5* (Aug. 15, 2023), available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1529956606.pdf>;

of an additional conservation concern since AYK chum escapement has been met in the last 2 years.

Even if ACR 13 demonstrated the existence of a conservation problem, which it does not, it is still insufficient under the Board's ACR Policy because it does not demonstrate that the problem can be addressed by adjusting 5 AAC 09.332. Proponent cites zero evidence that reduced seine net depth and length in the Alaska Peninsula will have any impact on returns of AYK salmon.

It is well-established that Area M June harvest rates of Central Western Alaska (CWAK) chum are too low to impact any particular chum run. The Western Alaska Salmon Stock Identification Program (WASSIP) identified total harvests, harvest compositions and harvest rates in the Area M June fisheries in 2006, 2007 and 2008. ADF&G's 2022 genetic study sought to update stock composition and harvest rates of chum salmon harvested in South Alaska Peninsula fisheries. The harvest composition identifies the percentage contribution of different runs to the overall harvest in a given area or fishery. The harvest rate identifies the percentage of a total run that is harvested in a given area or fishery. For conservation purposes, the harvest rate is the more important metric; a low harvest rate indicates a low impact on the run, regardless of the percentage contribution of the run to the overall harvest in the fishery. This data, which was exhaustively discussed and debated at the February 2023 Board meeting, remains the best available data on harvest rates of CWAK origin fish in the June fisheries.

These studies confirm Area M fisheries have very low harvest rates on CWAK stocks (which includes runs originating from 800 miles of coastline from Bristol Bay to Norton Sound).

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*Kuskokwim River Fishery Announcement #2* (June 10, 2024), available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1579961788.pdf>;  
*Kuskokwim River Salmon Fishery Announcement #4* (Aug. 15, 2024), available at <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1626258045.pdf>.

WASSIP aggregated all Central Alaska chum stocks, including AYK and Bristol Bay to a single genetic stock group. The WASSIP study found that the Alaska Peninsula harvest rates on the CWAK Reporting Group, including Norton Sound, the Yukon, Kuskokwim and Bristol Bay, were relatively small. Combining the Shumagin Islands Section, Dolgoi Island Area, Ikatan Area and Unimak District, the harvest rates in the June Alaska Peninsula fisheries on the CWAK group were 2.2% in 2007, 3.5% in 2008 and 6.9% in 2009.<sup>8</sup> In 2004, looking at similar data from the 1987 tagging study and the mid-1990s genetic studies, the Board of Fisheries found that “the June fishery is a low impact fishery with very low harvest rates (in the low and mid single-digit range, percentage-wise) on the separate stocks involved.” (Board of Fisheries Finding # 2004-229-FB at 2).<sup>9</sup> The Board “agree[d] with prior boards which have found that the impact of the June fishery on specific stocks of AYK chum salmon is negligible and that reducing the chum harvest in the fishery would not produce detectable results or measurable benefits to AYK chum runs. (c.f., board finding # 96-164-FB).”<sup>10</sup> *Id.* at 4.

The 2022 genetic study again found low harvest rates of CWAK chum in the Area M June fishery. ADF&G, RIR No. 5J2302 at 36 Table 28 (South Alaska Peninsula June harvest rate on CWAK of 5.5%); Table 25 (June seine fishery harvest rate on CWAK of 3.2%).<sup>11</sup> The harvest rates for Area M fisheries include not just AYK chum in these low harvest rates but also Bristol Bay and Norton Sound chum which are part of the CWAK stock group. And Area M fisheries are

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<sup>8</sup> ADF&G Special Publication 12-25, *Harvest and Harvest Rates of Chum Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2007-2009* at Tables 22-33. Munro A., et al. <http://www.adfg.alaska.gov/FedAidpdfs/sp12-25.pdf>

<sup>9</sup>[https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/akpen/rcs/rc048\\_Dale\\_Carlson\\_BOF\\_Finding\\_2004-229-FB.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/akpen/rcs/rc048_Dale_Carlson_BOF_Finding_2004-229-FB.pdf)

<sup>10</sup> <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff96164x.pdf>

<sup>11</sup><https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/peninsula/RIR.5J.2023.02.pdf>

only one of several that potentially intercept AYK-bound salmon; as the most recent study confirms, those interceptions cannot cause the chum declines seen in the AYK beginning in 2020. Harvest rates at those levels cannot be the driver of Yukon River summer chum abundance, which is highly variable, but poor ocean rearing conditions do explain the abnormally low returns in 2021 and 2022.<sup>12</sup>

The 2022 study further demonstrates that the majority of chum caught in the Area M June fishery are of Asian origin (58%).<sup>13</sup> Preliminary 2023 genetic analysis results again show that Asian origin chum contributed the largest proportion of the June fishery chum harvest, at 39.5% stock composition (not harvest rate, which has not been published yet by ADF&G).<sup>14</sup> The large amount of immature Asian chum caught in the June fishery suggest yet another potential reason for AYK chum declines. Recent scholarship shows that “smaller adult length-at-age, delayed age-at-maturation, and reduced productivity and abundance of the Norton Sound [chum] salmon population were associated with greater production of Asian hatchery chum salmon,” and that those findings “indicate that competition with [Asian] hatchery chum salmon contributed to the low productivity and abundance of Norton Sound chum salmon.” (Ruggerone, G.T., *et al.* 2012).<sup>15</sup> The high abundance of Asian chum in the Area M fishery at the same time that CWAK summer

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<sup>12</sup> Presentation of Dr. Kathrine Howard, *AYK Chum Salmon Marine Research: A Report to the Alaska Board of Fisheries* (Feb. 2023), available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/peninsula/11%20Marine%20research%20Overviewhttps://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/peninsula/11%20Marine%20research%20Overview.pdf>

<sup>13</sup> Dann, T. H., H. A. Hoyt, E. M. Lee, E. K. C. Fox, and M. B. Foster. 2023. Genetic stock composition of chum salmon harvested in commercial salmon fisheries of the South Alaska Peninsula, 2022 at p.15. Alaska Department of Fish and Game, Special Publication No. 23-07, Anchorage.

<sup>14</sup> ADF&G, *South Alaska Peninsula Chum Salmon 2023 Results*, available at [https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaakpeninsula.chum\\_results\\_2023](https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaakpeninsula.chum_results_2023)

<sup>15</sup> Ruggerone, G.T., *et al.*, Evidence for competition at sea between Norton Sound chum salmon and Asian hatchery chum salmon. *Environ. Biol. Fish* (2012) 94:149-163

chum are present may suggest that competition for prey during the juvenile stage between Asian and CWAK chum may have a negative impact on CWAK chum.

Regardless, 2023 and 2024 AYK chum returns improved when compared to 2022, and subsistence opportunity was provided in the AYK in both years. And it is well-known that the annual Yukon summer chum run has strong cycles of high and low abundance over the long term. ADF&G, FMS 15-07 at p. 15 (2015).<sup>16</sup> Given the otherwise low harvest rates on the CWAK-bound chum in the June fisheries, there is no reason to believe they have either contributed to or can ameliorate the low-run sizes in recent years.<sup>17</sup>

Accordingly, ACR 13 has not demonstrated a conservation concern warranting an agenda change to adjust Alaska Peninsula seine sizes at an out-of-cycle meeting, nor has it shown any new information that warrants consideration of an allocative proposal, nor does it demonstrate that the problem purportedly identified by the ACR can be addressed by adjusting seine specifications in 5 AAC 09.332. Because the ACR does not meet Board policy for an agenda change request, it should be rejected.

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<sup>16</sup> <https://www.adfg.alaska.gov/fedaidpdfs/fms15-07.pdf>

<sup>17</sup> Likewise, there is no evidence that the June fishery chinook harvest has any impact on any single Chinook run. The 2003-2022 average June fishery harvest is 6,044 Chinook. ADF&G, SP 23-07 at p. 36 (Table 1), available at <https://www.adfg.alaska.gov/FedAidPDFs/SP23-07.pdf>. The 2023 June fishery harvest of Chinook was 1,824. ADF&G, *2023 Alaska Peninsula and Aleutian Islands Salmon Season Summary* at 5. The 2024 June fishery harvested 1,209 Chinook. <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaakpeninsula.salmonharvestsummary>. Those Chinook are all headed to different rivers and drainages, thus making it highly unlikely that Area M June chinook harvest has any meaningful impact on any single run.

## Area M Seiners Association Adaptive Fleet Management Program June 2024 Post-Season Report

### Key Takeaways

- In total, there were 193.7 hours in the Shumagins and 175.2 hours in South Unimak of foregone fishing time and/or time and area closures above and beyond what is required in regulation.
- ADFG reported a total harvest of 423,833 chum salmon and 1,096,491 sockeye salmon across all gear types, and the data portal estimated roughly 318,075 chum salmon (75%) were harvested by the seine fleet.
- 2024 harvest of chum was 14.7% below the 10-year average and 6.8% below the 20-year average, and a 112% YOY increase from 2023, 22% YOY decrease from 2022 harvest, and an 63% decrease from 2021.
  - It should be noted that chum abundance and harvest naturally fluctuates from year to year, and thus historical chum harvest averages are not static and will fluctuate in response to every new year added to the dataset.

### Adaptive Management Plan Summary

#### *Fishermen Board Management*

The fishermen board's ("Board") purpose was to manage overall fleet harvest to optimize sockeye harvest and allow chum to pass through the fishing grounds. Board members were elected to ensure fair representation among all fleets delivering to various processors and spatial distribution, with board members serving as conduits for updates from the fishing grounds. The board typically met at least twice per day; in the evening to discuss a tentative fishing schedule for the following day and again in the morning to confirm the schedule after preliminary harvest data was uploaded to the portal for the previous day. The Board would then deliberate whether fleet-wide closures or more spatially targeted closures were necessary, using a combination of preliminary harvest data, number of vessels and fish tickets contributing to data, updates from fishing grounds, and harvest trends by non-seine gear. Once a closure was finalized, a Board member would log it in the portal and a notification email was sent to the entire fleet. The Board tried to provide at least a two-hour notice before a fleet wide closure.

Volume seemed relatively low again this year, although chum presence was higher at times. For this reason, during the first period the Board acted very conservatively, using fleet-wide closures and foregoing most of the period. As the season progressed, chum presence became highly variable between the localized fishing areas, leading the Board shift more toward local area closures mandated by Board members in those areas to allow more flexibility for fishing in areas with low chum presence. The seine fleet remained well under the trigger thresholds at both trigger dates and ultimately finished the season under the June 23<sup>rd</sup> threshold.

#### *Individual Vessel Accountability*

The management agreement stipulated a secondary level of accountability for individual vessels. Vessel captains were provided with a login for the data portal, which displays their vessel report card. Report cards list each fish ticket by landing date and calculates their variance of chum harvest and ratio from the fleet average on a daily and period basis. In effect, individual vessels could see whether they were within the fleet average or an outlier in terms of chum harvest. Fishermen worked to stay within certain targets, but were only assessed at the end of each period. This allowed them to maintain some autonomy to decide when and where to fish daily based on their performance relative to the fleet, provided fishing was open.

#### *Processor Involvement*

As in the prior season, the seine fleet collectively requested that their respective processors mandate 100% participation from the fleet in order to have a market in June. This was accomplished via signed

management agreements with the processors serving as the enforcing party in the agreement. The board consulted with processors to develop a tender sampling design with minimum requirements, although for larger deliveries processors often opted for more robust sampling. When possible, average weights were calculated from samples and extrapolated to the delivery using internal worksheets. These data were transmitted to the plant, where plant staff develop preliminary harvest reports that are submitted to the ADFG Area Management Biologists for inseason reporting and to the data portal each morning.

There have been major shifts in processors since the first year of the program, with the sudden closure of the Peter Pan Seafoods plant in King Cove. This was an extremely stressful event, as the remaining two processors scrambled to provide a market to stranded vessels with Silver Bay Seafoods taking up a huge majority of the Peter Pan fleet at the last minute. Despite this enormous lift, both processors were cooperative in helping us transition these vessels to new profiles in the salmon portal, and highly engaged throughout the season.

#### *Portal Management*

The Portal Manager (“PM”) was responsible for QA/QC of portal data. Every morning the PM would verify all processors submitted their preliminary data and manually input the total harvest for all gear types in the South Peninsula and review preliminary data for any potential data entry errors. The portal software was also adjusted regularly based on fishermen feedback.

#### **Management Results**

- There was 100% participation from seine fleet for a total of 46 vessels with signed agreements, 7 of which were Board members throughout the season.
- The fleet implemented a total of 26 closure events (1 mandatory full-fleet closure and 25 area specific standdowns) in addition to 3 regulatory closures in the Shumagins.
- Each closure/standdown ranged in duration from 2 hour to 20.2 hours and occurred at various times throughout each period.
- Shumagins had 121 hours of regulatory closures and 50.7 hours of mandatory closures resulting in at least a **55% reduction** in fishing time from regulation.
- South Unimak had 23 hours of mandatory fleet-wide closures resulting in at least a **7% reduction** in fishing time from regulation.
- Area-specific standdowns were calculated separately as they were technically still allowed to fish by moving locations. However, given the vast spatial distance between most of the grounds, fishermen were unlikely to move for most of the standdowns opting to wait and see if fishing improves:
  - Shumagin areas collectively had 22 hours of closures and South Unimak collectively had 152.2 hours of closures
- **In total, there were 193.7 hours in the Shumagins and 175.2 hours in South Unimak of foregone fishing time and/or time and area closures above and beyond what is required in regulation.**
- It should be noted that, in addition to chum-responsive closures, there were several days of foregone fishing due to poor weather conditions.

#### **Harvest Results**

- ADFG reported a total harvest of 423,833 chum salmon and 1,096,491 sockeye salmon across all gear types, and the data portal estimated roughly 318,075 chum salmon (75%) were harvested by the seine fleet.

- 2024 harvest of chum was 14.7% below the 10-year average and 6.8% below the 20-year average, and a 112% YOY increase from 2023, 22% YOY decrease from 2022 harvest, and an 63% decrease from 2021.
- 2024 harvest of sockeye was 28% below the 10-year average and 23% below the 20-year average, but had a **24% YOY increase from 2023** which explains the relative increase in chum harvest.

**Submitted By:** Neil (Curt) Armstrong  
**Community of Residence:** Dillingham

**Comment:**

I am Opposed to ACR 11 I don't feel this meets the criteria for an ACR and should be discussed at an on cycle meeting

I have fished on our family site , on the marker at Graveyard Pt since 1971 and NEVER witnessed a season where the Naknek section was closed ,and the Kvichak open .

Dear Board of Fish Members,

We are Kodiak setnet permit holders, fishing in Uyak Bay since 2006 and have lived in Alaska since 1990.

**We are writing in support of ACR # 14 and ACR # 15.**

We participate in a Joint Venture because it allows us to combine our total fathoms of gear fished into three fishing sites. This is not possible if we operate our permits independently. It gives us versatility in how and where we fish our gear. However, as the regulations are written currently, we cannot increase our aggregate fathoms of gear fished to 350 fathoms. It would be of great help to us if ACR # 14 was put into regulation. If ACR #14 is not passed into regulation we will have to fish independently to take advantage of the additional 25 fathoms per permit that we are allowed. This means we would lose the versatility that exists with the Joint Venture.

We support ACR # 15, as we are a two permit operation with one skiff and most times during the season we would be unable to keep our catch separated while waiting to deliver our catch.

Thank you for your consideration.

Sincerely,

Lauri & Jeff Bassett  
Greenbanks Setnet, Uyak Bay

Dear Board of Fisheries Chair and Members,

My wife and I have both been Kodiak salmon setnet permit holders since 1995 and I have been fishing in the Central Section of the Northwest Kodiak District since 1980.

I am writing in support of ACR #14 and ACR #15.

ACR #14 - Having the ability to fish a joint venture, without being penalized with reduced fathoms of gear, has been a long-standing option for families and others wanting to combine their efforts under a 3-net "joint venture" configuration. Since the January 2024 BOF meeting, the joint venture option for Northwest Setnetters has been diminished. Those choosing to utilize a joint venture in 2024 lost 50 fathoms of aggregate gear. This change took place during an RC, which was taken up at the very end of the recent Kodiak BOF meetings, after the period for public input had ended and no questions came up for the Department to address the impact of this RC on joint ventures. We have operated a joint venture previously and feel it is an important option for us and many other setnetters in the Central Section of the Northwest Kodiak District.

It is important to fix this now rather than wait until the next board cycle because it restores the consistency of things that has been in place since 1985 of equal aggregate gear lengths for individual operations and those that choose to operate 2 permits together in a three (3) net joint venture configuration. If not fixed, through the process of an ACR, we must wait until the next BOF cycle which creates an unfair situation for those who have historically fished joint ventures or would like to operate one next year.

ACR #15 – Our fixed-gear, shore-based fishery can have nets (sets) with large distances between them. Logistically, our fishery is unlike other boat-based fisheries. It is impossible for a permit holder to always be in a skiff harvesting, taking care of things on shore, delivering the harvest and coordinating operations all at the same time in different locations. It requires cooperation of multiple permit holders in a multi-permit operation, to get their harvest to the tender. Separating the fish out by permit is not practicable and likely impossible under a joint venture. The reporting of harvest by each permit, within a multi-permit or family operation, has not been a concern for decades. Additionally, reporting of overall pounds, the number of fish by species and the statistical area of the harvest will continue to be a reporting requirement.

Neither of these ACRs are asking for something drastic, they are just a realization of what is practical, keeps things consistent regarding past practices and helps provide tools for a struggling fishery, all while simultaneously not taking away from another fishery.

Thank you for your consideration.

Regards,

Mark Beardsley

**Submitted By:** Richard Blanc  
**Organization:** High Rock Fisheries  
**Community of Residence:** Set gill net Kodiak Alaska

**Comment:**

Please accept and act on ACR 15 submitted by the Northwest Setnetters Association and Duncan Fields.

My family fish 4 CFEC PERMITS. Enforcing the current regulation is untenable. That will be a horrendous hardship on an already depressed fishery.

Richard Blanc set net fisherman for 53 years.

**Submitted By:** Paul Boyden  
**Community of Residence:** Funny River Alaska

**Comment:**

ACR9 & ACR10 I am in favor of both of these ACR's.

ACR9 to increase size and bag limit of rainbow trout will at least slow the elimination or depletion of salmon stocks. I have fished the central part of the Kenai River for over 51 years and have seen t

**Submitted By:** Patrick Boyden  
**Community of Residence:** Anchorage

**Comment:**

ACR#10 I SUPPORT the change.

**Submitted By:** Heidi Chay  
**Community of Residence:** Kenai

**Comment:**

I am writing on behalf of the Barnes family fishsite (5 permit holders, 18 family members total) in support of a request submitted by Sarah Frostad-Hudkins and other East Side Setnetters to the BOF to move ACR 8 to a meeting agenda prior to the 2025 UCI Eastside Setnet fishery season in order to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

We agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted. When the BOF enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the Board did not have the set beach seine net testing data at the 2024 meeting and

therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 with very promising results both in terms of king conservation and preserving an economically viable fishery. Several of us saw the beach seine in operation at two different locations and support this development of the fishery.

**Submitted By:** City Clerk

**Organization:** City of Kenai

**Community of Residence:** Kenai

**Comment:**

Please see attached Resolution No. 2024-42 passed by the Council of the City of Kenai on October 2, 2024: A Resolution Supporting Agenda Change Request 8 at the Upcoming Alaska Board of Fisheries Work Session to Allow Set Beach Seine Nets as an Alternative Gear Type for the Eastside Setnet Fishery While in the Kenai River Late-Run King Salmon Stock of Concern Management Plan.



Sponsored by: Knackstedt

**CITY OF KENAI  
RESOLUTION NO. 2024-42**

A RESOLUTION SUPPORTING AGENDA CHANGE REQUEST 8 AT THE UPCOMING ALASKA BOARD OF FISHERIES WORK SESSION TO ALLOW SET BEACH SEINE NETS AS AN ALTERNATIVE GEAR TYPE FOR THE EASTSIDE SETNET FISHERY WHILE IN THE KENAI RIVER LATE-RUN KING SALMON STOCK OF CONCERN MANAGEMENT PLAN.

WHEREAS, the City benefits from well-managed salmon runs as a central part of its economy, culture and quality of life for residents and visitors; and,

WHEREAS, all user groups in the City: sport; personal use; subsistence; and commercial benefit from healthy, sustainable salmon runs in the Kenai River and Kasilof Rivers; and,

WHEREAS, the City supports a well-managed fishery based on sound scientific research-based decision making allowing for diversified harvest opportunities and maximum sustainable yield; and,

WHEREAS, the Upper Subdistrict Eastside set gillnet fishery (ESSN) has been completely closed or severely limited in recent years to protect late-run king salmon which are designated as a stock of concern; and,

WHEREAS, while all other user groups have continued to have harvest opportunity for sockeye salmon under the Kenai River late-run king salmon stock of concern management plan, the Upper Subdistrict Eastside set gillnet fishery has been completely shut out, or allowed only minimal opportunity, to protect late run king salmon; and,

WHEREAS, to address this issue for the 2024 season, the Board of Fish allowed commercial dipnets in the ESSN, which allowed for some harvest of sockeye salmon while continuing to protect king salmon, but harvest was far from historic allocation harvest and participation was limited; and,

WHEREAS, testing of set beach seine nets under an ADFG Commissioner's Permit during the 2024 season showed that they can be an effective economically viable method of harvesting sockeye salmon within the ESSN while allowing for live release of every king salmon incidentally caught; and,

WHEREAS, Agenda Change Request 8 (ACR 8) presented at the Alaska Board of Fisheries Work Session scheduled for October 29-30, 2024 requests the consideration as an agenda item at a future board of fish meeting prior to the 2025 Upper Cook Inlet salmon season for the addition of set beach seine nets as legal gear under the Kenai River late-run king salmon stock of concern management plan; and,

WHEREAS, ACR 8 meets two of the three criteria considerations required for Board approval including a fishery conservation purpose or reason and new information that the board must consider to approve agenda change requests; and,

WHEREAS, unless ACR 8 is considered, which would allow the Board of Fisheries to act on the requested change prior to the 2025 salmon season, set beach seine nets would not be allowed within the ESSN starting with the 2025 season and while under the Kenai River late run king salmon stock of concern management plan, the ESSN fishery would largely be shut out again; and,

WHEREAS, the City supports ACR 8, as allowing ESSN permit holders to once again meaningfully participate in the fishery with a gear type that allows for live release of every king salmon, meets the City's goals of a well-managed salmon runs while allowing for diversified harvest opportunities by historical users.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA:

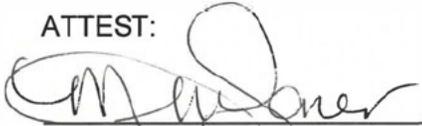
**Section 1.** That the Kenai City Council Respectfully requests the State of Alaska Board of Fisheries, at its October 29-30 Work Session, to approve ACR 8 based on the criteria of conservation and new information and add as an agenda item, set beach seine nets as legal gear under the Kenai River late-run king salmon stock of concern management plan at a future meeting prior to the 2025 Upper Cook Inlet Salmon Season.

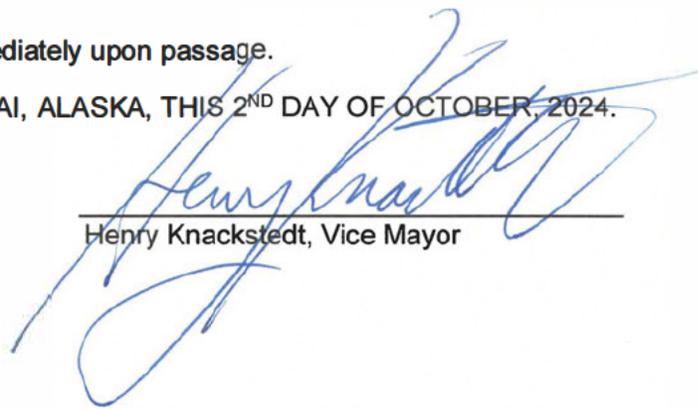
**Section 2.** That a copy of this resolution be forwarded to the State of Alaska Commissioner of Fish and Game, all members of the Board of Fisheries, Governor Mike Dunleavy, State Representative Ben Carpenter, State Representative Justin Ruffridge, State Representative Sarah Vance, State Senator Gary Stevens and State Senator Jessie Bjorkman.

**Section 3.** That this Resolution takes effect immediately upon passage.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS 2<sup>ND</sup> DAY OF OCTOBER, 2024.

ATTEST:

  
\_\_\_\_\_  
Michelle M. Sauer, MMC, City Clerk

  
\_\_\_\_\_  
Henry Knackstedt, Vice Mayor



# KENAI

City of Kenai | 210 Fidalgo Ave, Kenai, AK 99611-7794 | 907.283.7535 | www.kenai.city

## MEMORANDUM

**TO:** Mayor Gabriel and Council Members

**FROM:** Henry Knackstedt, Council Member

**DATE:** September 26, 2024

**SUBJECT:** **Resolution 2024-42** - Supporting Agenda Change Request 8 at the Upcoming Alaska Board of Fisheries Work Session to Allow Set Beach Seine Nets as an Alternative Gear Type for the Eastside Setnet Fishery While in the Kenai River Late-Run King Salmon Stock of Concern Management Plan.

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The City has consistently advocated for well managed salmon runs based on sound scientific - decision making and supported all user groups of the resource. In recent years all user groups have enjoyed opportunity to harvest sockeye salmon except the Upper Eastside Set Gillnet Fishery (ESSN) which has been completely closed or extremely limited to protect late run king salmon which have been designated as a stock of concern. For the 2024 season, the Board of Fisheries allowed commercial dip netting in ESSN which provided a limited sockeye harvest opportunity for some ESSN permit holders. Also during the 2024 season, set beach seine nets were tested in the ESSN fishery under a ADFG Commissioner's Permit. The testing showed that beach seine nets can be an economically viable method of harvesting sockeye without killing King salmon, which can be live released while the nets remain in the water.

Agenda Change Request 8 (ACR 8 (Attached)), which is attached, requests the Board of Fisheries to consider allowing beach seine nets as legal gear in the ESSN under the late-run king salmon stock of concern management plan. ACR 8 which will be presented at the October Board of Fisheries work session requests a change to the Board's Agenda at a future meeting to consider allowing this new gear type. Consideration by the Board of Fisheries of ACR 8 at the upcoming work session is the only avenue to approve beach seine nets within the ESSN under the late-run king salmon stock of concern management plan in time for the 2025 season.

Your consideration is appreciated.

**ACR 8**

Add set beach seine nets as legal gear under the *Kenai River late-run king salmon stock of concern management plan* (5AAC 21.382).

**CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.**

5 AAC 21.382. Kenai River late-run king salmon stock of concern management plan.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.**

The Upper Subdistrict Eastside set gillnet fishery (ESSN) has been completely closed for two consecutive years for king salmon conservation and because an economically viable live release gear type was not available. The closures have resulted in the loss of their historical allocation of sockeye salmon, surplus sockeye salmon above escapement goals in the Kenai and Kasilof rivers, and significant economic loss to the local community that was partially supported by the ESSN fishery. The Board of Fish (BOF) added dipnets as a gear type in 2024, while some beaches experienced success at times during the season this gear type alone is not enough to approach historical levels of harvest and economic stability.

**WHAT SOLUTION DO YOU PREFER?**

Add set beach seine nets as an alternative gear type in the ESSN as follows:

5 AAC 21.382 (g)

(6) From June 20 through August 15:

(A) allow for the use of one set beach seine net as an alternative gear type for holders of a SO4H commercial set gillnet CFEC permit; for use with shore based setnet infrastructure.

(B) if set beach seine nets are operated when commercial fishing in the Upper Subdistrict of the Central District is open to SO4H permit holders for set gillnet gear, the CFEC permit holder operating the set beach seine net will not be allowed to fish gillnet gear for that CFEC permit.

(D) openings will be three days per week and may occur outside of specified openings in this section based on abundance of sockeye salmon, as announced by emergency order.

(E) fishing with a set beach seine net may occur only from shore; fishing from shore must occur at the location of a shore fishery tract identified in the recorded plat for that AS 38.05.082 lease or a City of Kenai issued lease; or historic beach staked gillnet locations, nothing in this subsection affects or changes the terms or conditions of an AS 38.05.02 or City of Kenai lease and its lessee.

(F) set beach seine nets may be up to 100 fathoms in length, 215 mesh deep including border and chaffing strips, up to 10 lb lead lines and maximum 3 ½ inch mesh size.

**STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW.**

**for a fishery conservation purpose or reason:** The data from the successful testing of the set beach seine nets was not available during the 2024 Board of Fisheries meeting. The method has now been proven as a successful ethical harvest method of sockeye salmon while successfully releasing all king salmon in excellent condition during times of king salmon conservation.

**to correct an error in regulation:** N/A

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** When the board of fish enacted the Stock of Concern in Upper Cook Inlet at its 2024 UCI meeting,

dipnets were added as an alternative gear type in the new regulation. The board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** The harvestable surplus of sockeye in both the Kasilof and Kenai Rivers will continue to be unharvested and wasted and the Eastside Setnet beach fishermen will be left with the possibility of only dipnet opportunity, which resulted in a fraction of the harvest of their historical allocation of sockeye by the Eastside Setnet fishery in 2024.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** The Eastside Setnet fishery had an allocation in a fully allocated fishery before they were closed or severely restricted for King Conservation for the past several years. The selective harvest set beach seine nets will allow the capture of sockeye while allowing the release of every king salmon in excellent condition, thus enabling the Eastside Setnet fishermen to harvest sockeye at historically allocated levels.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** The new information is that set beach seine nets were tested by commissioners permit numbers UCI-2024-01 and UCI-2024-03 and successfully released all king salmon alive and in excellent condition, harvested enough sockeye to make it economically viable, the set beach seine net worked on many beaches and fishermen will be able to use their existing lead lines, cork lines, corks, and infrastructure to prosecute the fishery without substantial expense.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** Commercial setnet fishermen who tested the Set Beach Seine nets with Commissioners Permit Number UCI-2024-01-Experimental Use of Beach Seines in the Upper Subdistrict of Upper Cook Inlet.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** Set beach seine nets have never been considered as a gear type at a board of fisheries meeting.

**SUBMITTED BY:** Brian G. Gabriel Sr. and Lisa Gabriel

**CITY OF SEWARD**  
P.O. BOX 167  
SEWARD, ALASKA 99664-0167



- Main Office (907) 224-4050
- Police (907) 224-3338
- Harbor (907) 224-3138
- Fire (907) 224-3445
- City Clerk (907) 224-4046
- Community Development (907) 224-4049
- Utilities (907) 224-4050
- Fax (907) 224-4038

**PC18**

October 14, 2024

Alaska Department of Fish and Game  
Board of Fisheries  
PO Box 115526  
Juneau, AK  
99811-5526

Dear Board of Fisheries,

The Seward City Council sincerely invites the Board of Fisheries to hold their 2026 Lower Cook Inlet Finfish conference in Seward, Alaska. We hope you will select Seward and enjoy our wide variety of hotels, restaurants, and holiday cheer in December.

Thank you for your consideration,

A handwritten signature in black ink that reads "Sue McClure". The signature is written in a cursive style.

Sue McClure, Mayor

City of Seward

October 15, 2023

Alaska Board of Fisheries  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Re: CAMF Opposition to ACR #13

Dear Board of Fisheries members,

Concerned Area M Fishermen (CAMF) represents salmon permit holders who participate in the June South Unimak/Shumagin Island fishery, as well as in the post-June fishery in the South Unimak area. CAMF represents approximately 115 permit holders and their families. We have members residing in coastal Alaska from False Pass, King Cove, Sand Point, to the Kenai Peninsula, and also in the Anchorage Mat-Su bowl area.

CAMF opposes Agenda Change Request (ACR) #13. This is a request to the Board asking that the gear depth for purse seines be reduced for the June South Unimak and Shumagins Islands fishery. A similar ACR last year was rejected by the board. None of the three criteria listed under the Board's "Policy for Changing the Board of Fisheries Agenda" is met by this ACR. Proposals modifying purse seine depth have been previously considered by the Board, and the subject of this ACR is more properly considered during the next regular scheduled regulatory meeting for the Alaska Peninsula.

Respectfully,



Steve Brown, President  
Concerned Area M Fishermen  
[REDACTED]  
Homer, AK 99603

## **Background information for the South Unimak Shumagin Island June Fishery.**

Salmon have been harvested at South Unimak and in the Shumagin Islands during the month of June for over a century. There's a reason for this: the sockeye we catch are in prime condition and of the highest quality, bringing top dollar in the market. The June fishery may be the most scrutinized commercial fishery in the State and is very valuable to its participants, to the Alaska Peninsula economy, and to the State, and deserves to be managed in a manner that recognizes and enhances its economic and social importance. This is especially critical in this time of competition with farmed salmon and as Alaska seeks to generate greater revenues from its natural resources. Past Boards have understood the value of the June fishery and have been committed to assuring a viable sockeye harvest while protecting migrating salmon bound for other areas.

In 2004, the Board adopted significant changes to the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. These revisions simplified the management approach, ending a two-decade long experiment of imposing increasingly complex and untested regulations aimed at constraining our harvest of migrating salmon, especially chum salmon. That experiment culminated in 2001 with the adoption of a management plan that drastically cut our fishing time and severely impaired the area managers' ability to maintain a reasonable sockeye harvest. The Board in 2004 recognized multiple problems with the prior plans – not the least of which is that the various limits imposed on the June fishery over time had no effect on the fisheries intended to benefit from such limits – and opted instead for a straightforward management regime of scheduled openings that give us enough time on the water to sustain a reasonable harvest while providing a balance of closed periods. We encourage Board members to review the findings prepared by the Board in 2004 (2004-229-FB). In adopting these changes to the June fishery management plan, the key question the Board asked was whether the fishery would still perform within historical levels of harvest? The Department answered yes. Experience under the 2004 plan confirms that the Department was correct. The harvest of sockeye in the June fishery has ranged from roughly 3.9 million fish in 2022 to 660,000 in 2014, averaging 1,346,000 for the period 2012-2021.<sup>1</sup> During the same time, the harvest of chum ranged from approximately 179,000 chum salmon in 2015 to 1,168,600 in 2021 and has averaged around 502,000 fish for that period. The chum harvest in 2022 was 540,000. In 2023 844,300 sockeye and 199,372 chums were harvested in June. This past season the June harvest was 1,305,529 sockeye and 423,714 chum.

In 2023 the Board further restricted the June fishery. Fishing time for the seine fleet was reduced from 352 hours in June to 310 hours. The entire Sanak Island Section was closed to fishing in June. Harvest triggers and caps of chums were also adopted by

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<sup>1</sup> See South Alaska Peninsula Annual Management Report, 2022, Fisheries Management Report No.22-23 (December 2022), at 71, Appendix B5.

the Board. If the chum salmon harvest equals or exceeds 300,000 fish by June 18 the fishing time for the seine fleet is reduced by 44 hours during the remaining fishing periods in June. If the harvest cap of 450,000 chums is reached the fishery is closed for all gear types. In addition, the drift gillnet fleet and seine fleet agreed to “stand down” and not fish on the opening day of June 10<sup>th</sup> to pass chums through the fishery. The seine fleet also developed an application that provided “real time” harvest information to try to determine times to fish when sockeye harvest can be maximized, and chum harvest can be minimized. In 2024 the drift gillnet fleet participated in an application similar to the one developed for the seine fleet with the goal of maximizing sockeye to chum ratios.

Area M fishermen well understand the need to limit their harvest of chum salmon and have taken several steps toward this end. For instance, the commercial fleet (all gear types) participates in “chum harvest pools” where all chum we catch are pooled then divided equally among the fleet. This eliminates any incentive for an individual to target chum. In addition, the fleet has voluntarily stood down and not fished when there has been an abundance of chums present. In 2022, 2023, and 2024 the seine fleet adopted a voluntary “hot spot” stand down program whereby fishermen quit fishing in certain times and areas if local chum harvest was determined to be too high. This program had 100% participation by the seine fleet, and the harvest of chum in 2022 was cut in half relative to 2021. The 2023 and 2024 chum harvest was also lower than 2021. But it must also be recognized that occasionally there will be years when the presence of chum in Area M waters--particularly considering the dramatic increase in Asian chum hatchery production--that they will be hard to avoid. At some point, vessels will need to fish if they are to maintain a reasonable sockeye harvest. It is also important to dispel the notion advanced by some that the chum harvest in the June fishery should only be considered as “by-catch” to our harvest of sockeye. Chum salmon have been harvested in the June fishery as long as it has existed and constitute an important economic component of the fishery.

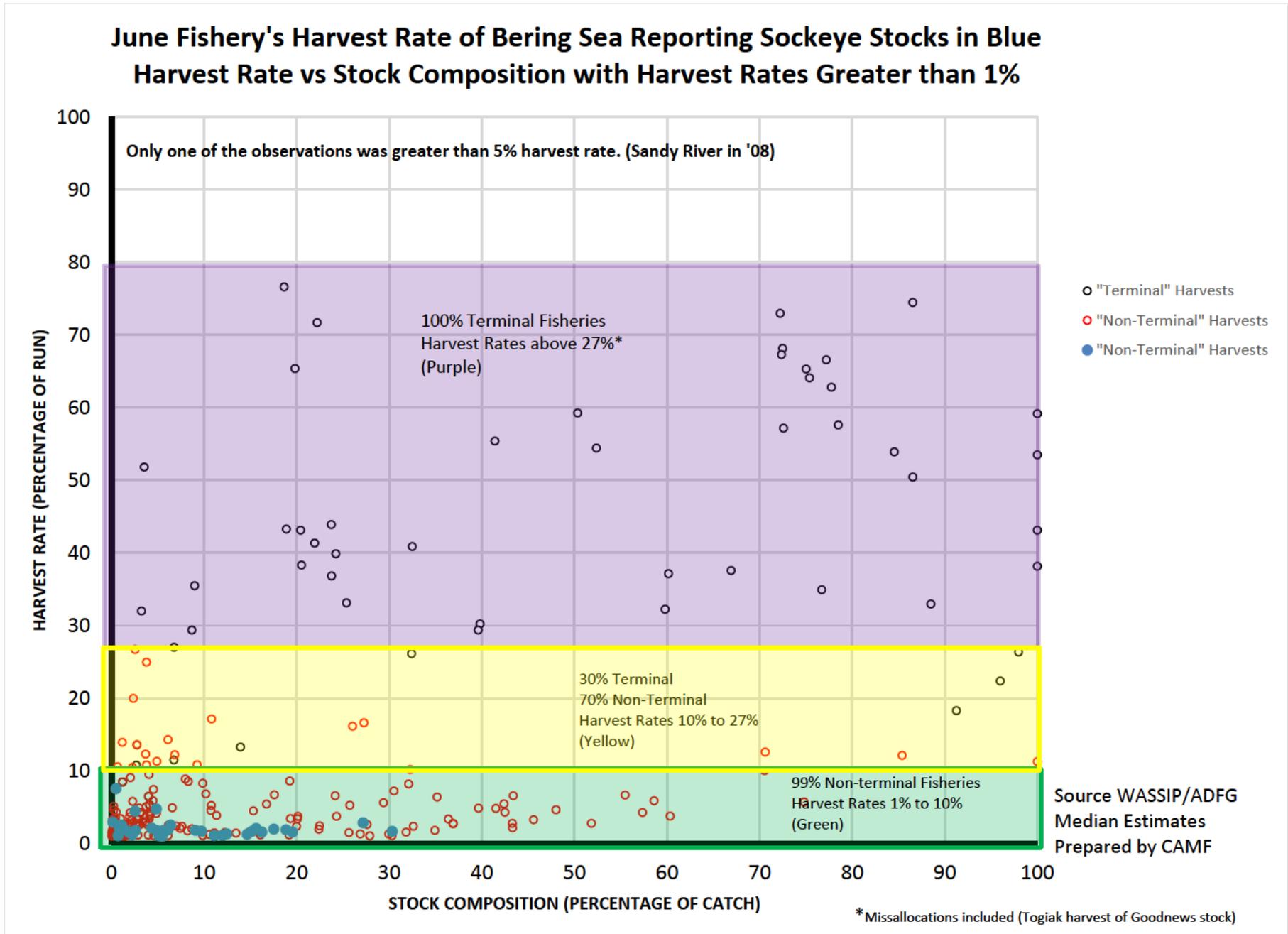
Detractors of the June fishery have long asserted that the mixed stock nature of the fishery risks adverse biological impacts. We disagree. Based on several studies of the June fishery – including tagging; genetic stock identification (GSI), including Western Alaska Salmon Stock Identification Program (WASSIP), the 2022 and 2023 GSI for chum in Area M; and mark-recapture data – certain conclusions have become clear:

1. Bristol Bay sockeye stocks in the fishery are highly mixed, and there is no risk that we will tap into a vein of fish from one river and have a disproportionate impact on a single stock. WASSIP data for sockeye clearly demonstrated the low harvest rates in the June fishery for stocks with origins in Bering Sea and Bristol Bay drainages. It is highly likely due to similar migration patterns that chums harvest rates in the June fishery are very similar to sockeye. (Figure 1)

2. The chum salmon harvested in our fishery originate from a wide geographic area – Japan, Russia, the AYK, Bristol Bay, the Alaska Peninsula, South-central Alaska, Canada, and the Pacific Northwest. (Figures 2,3 and 4)
3. Yukon fall chum, whose declines in the mid-1980s were cited as the basis for imposing the first chum cap, are present in very small numbers in the June fishery; and (Figure 5)
4. Only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing. (Figure 6)
5. The percentage of Asian chums in the June fishery has greatly increased since the WASSIP study was conducted. From 2007 to 2009 Asian chums ranged from 20% to 29% of the SUSI harvest. In 2022 and 2023 the median estimate for Asian chums was 58% and 40% respectively of the harvest. (Figure 7)

In summary, the June fishery has little biological impact on the salmon runs migrating through the South Peninsula area and there is no conservation risk from permitting a viable fishery to be prosecuted there. Proposals seeking to further restrict the Area M fisheries are based on the belief that there is, or should be, a priority allocation for stakeholders closer to the stream of origin of salmon stocks. This attitude is in direct conflict with the position of the State of Alaska as signatory of the Pacific Salmon Treaty, which recognizes the intrinsic equity claim for fisheries near waters where salmon grow to maturity. The State vigorously maintains that there is at least as much, if not more right to harvest based on the idea of contributions to growth in contrast to stream of origin. Within Alaska salmon are a common property resource that ‘belong’ to everyone, not just those nearest the stream of origin. The current June fishery management plan is working well, and data from WASSIP confirm the basis for prior Board actions and findings. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the nine-year study.

Figure 1.



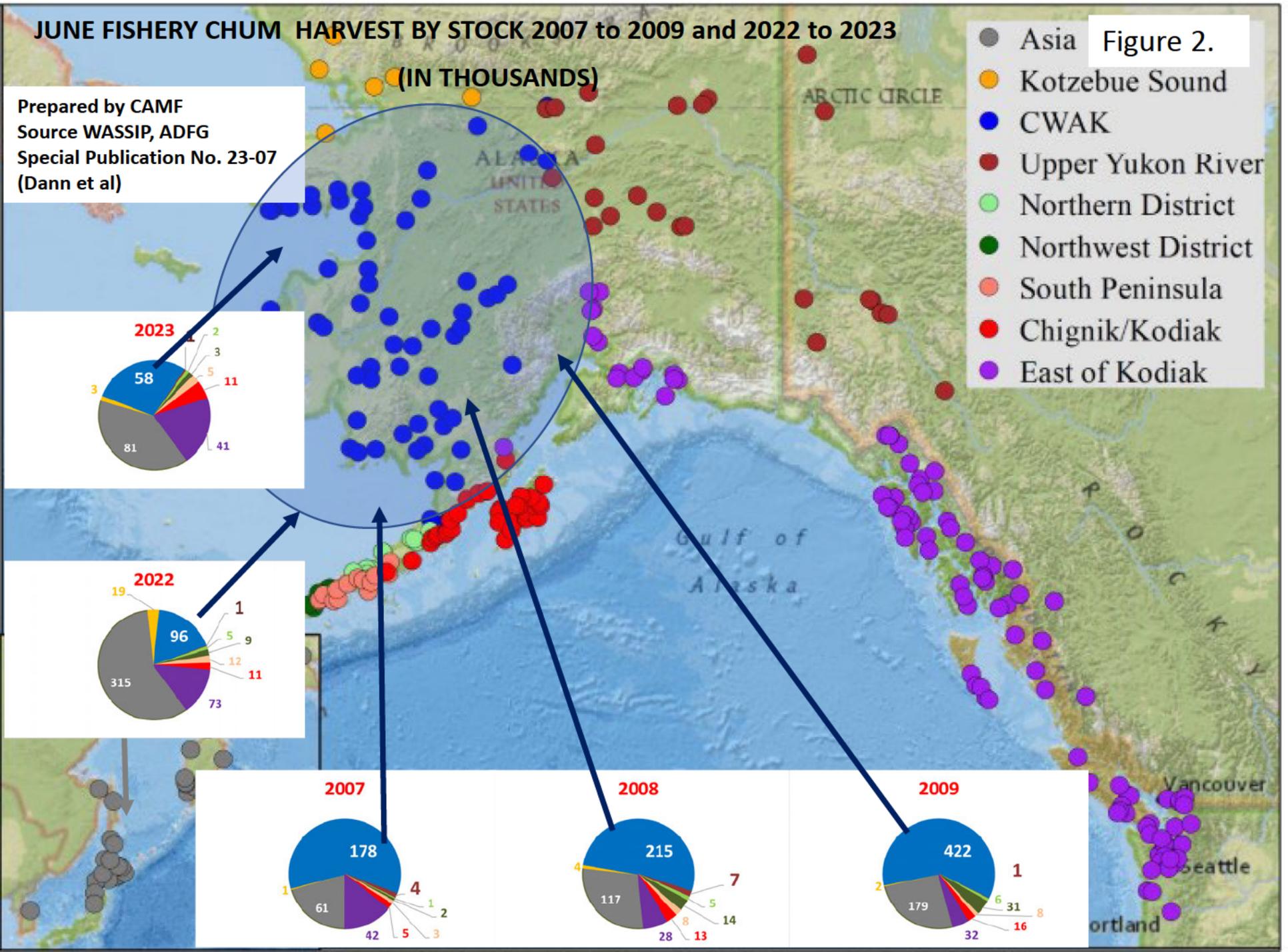
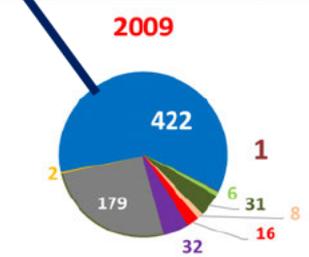
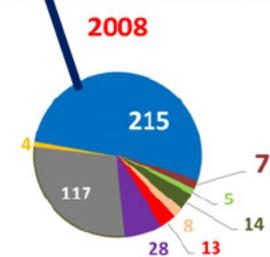
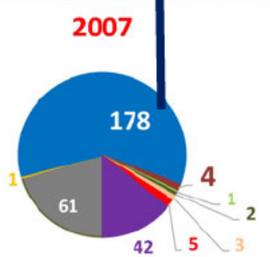
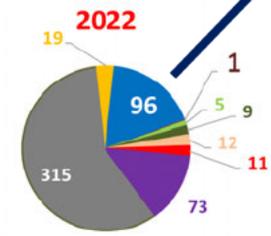
# JUNE FISHERY CHUM HARVEST BY STOCK 2007 to 2009 and 2022 to 2023

(IN THOUSANDS)

- Asia
- Kotzebue Sound
- CWAK
- Upper Yukon River
- Northern District
- Northwest District
- South Peninsula
- Chignik/Kodiak
- East of Kodiak

Figure 2.

Prepared by CAMF  
 Source WASSIP, ADFG  
 Special Publication No. 23-07  
 (Dann et al)

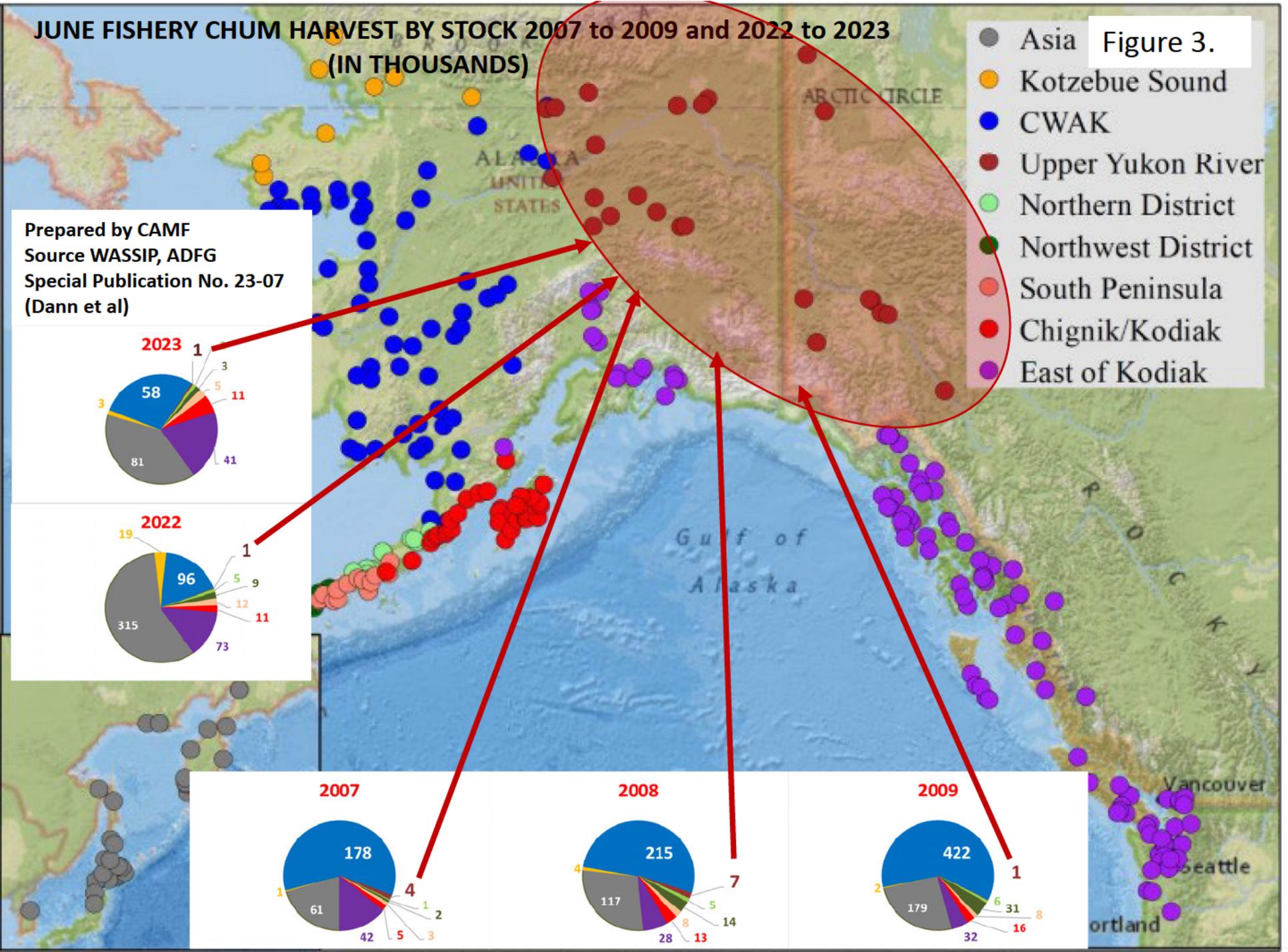
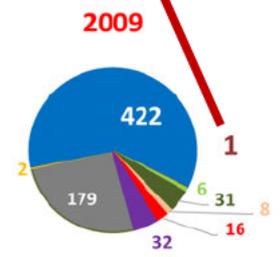
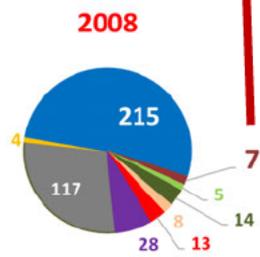
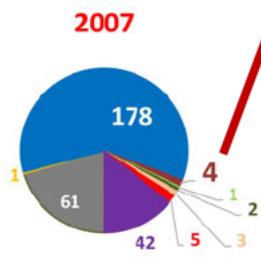
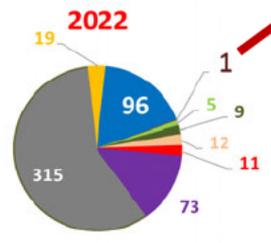
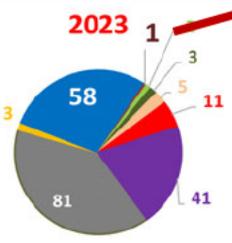


# JUNE FISHERY CHUM HARVEST BY STOCK 2007 to 2009 and 2022 to 2023 (IN THOUSANDS)

Figure 3.

- Asia
- Kotzebue Sound
- CWAK
- Upper Yukon River
- Northern District
- Northwest District
- South Peninsula
- Chignik/Kodiak
- East of Kodiak

Prepared by CAMF  
Source WASSIP, ADFG  
Special Publication No. 23-07  
(Dann et al)

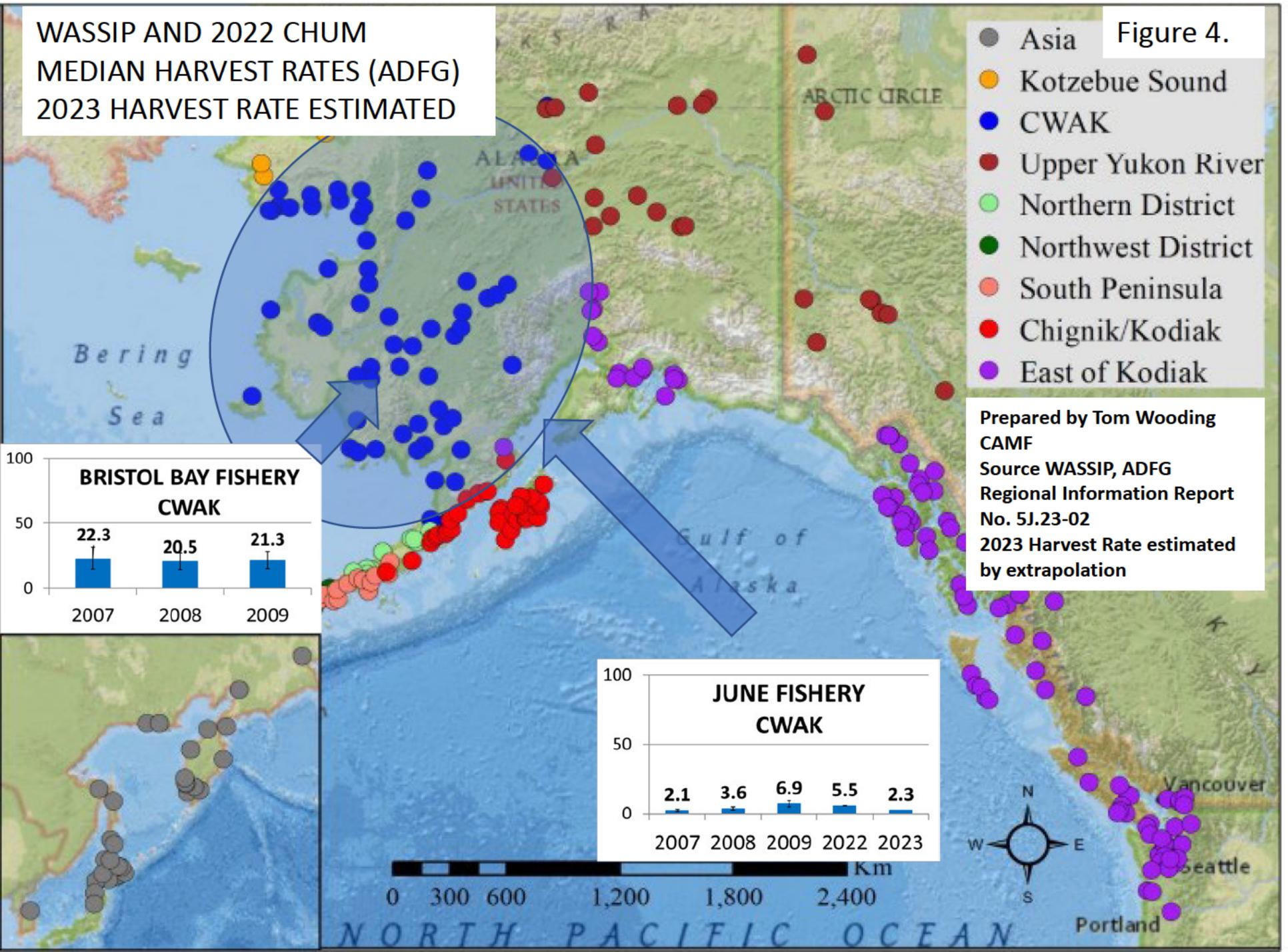


WASSIP AND 2022 CHUM  
 MEDIAN HARVEST RATES (ADFG)  
 2023 HARVEST RATE ESTIMATED

Figure 4.

- Asia
- Kotzebue Sound
- CWAK
- Upper Yukon River
- Northern District
- Northwest District
- South Peninsula
- Chignik/Kodiak
- East of Kodiak

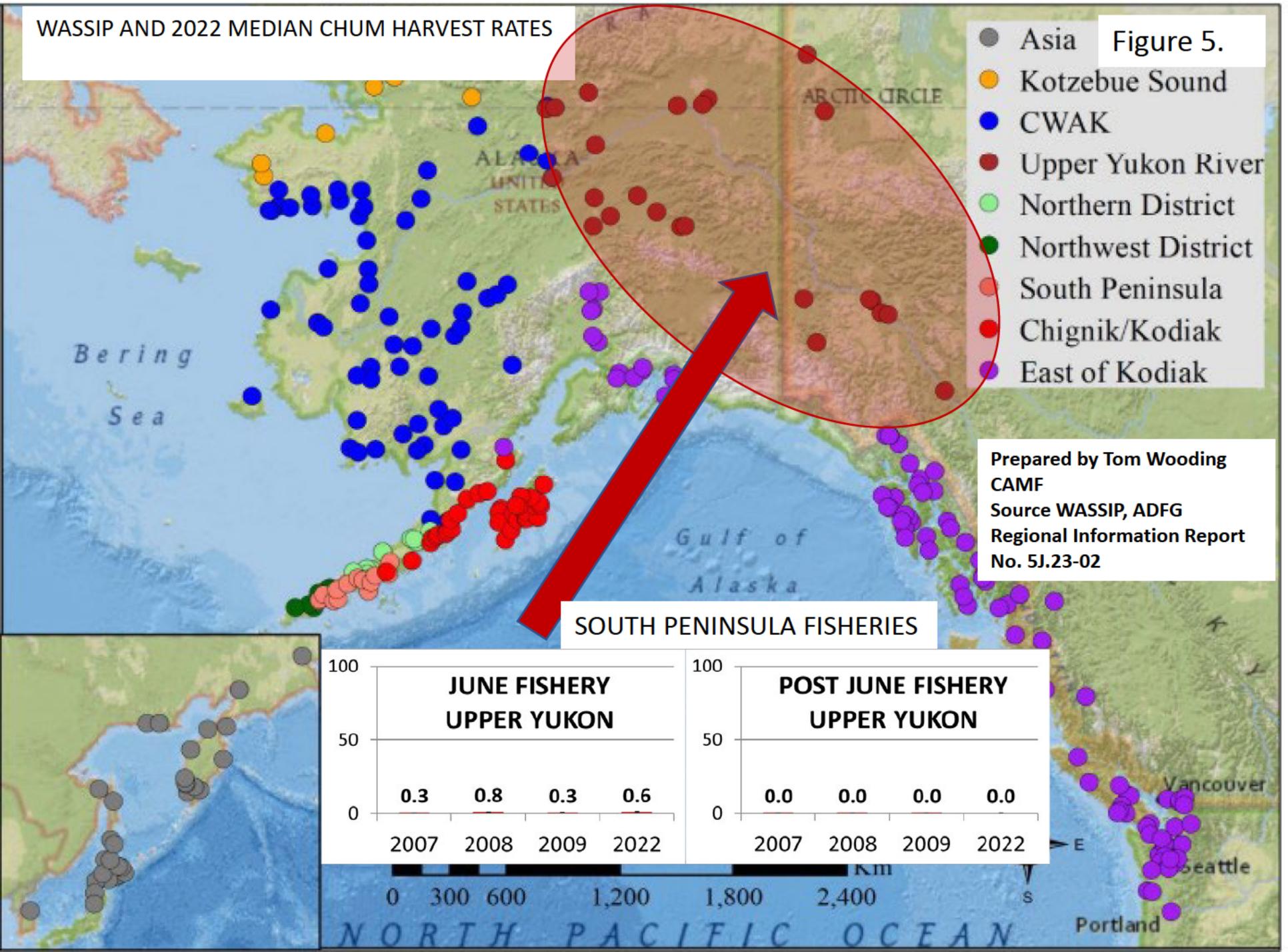
Prepared by Tom Wooding  
 CAMF  
 Source WASSIP, ADFG  
 Regional Information Report  
 No. 5J.23-02  
 2023 Harvest Rate estimated  
 by extrapolation



WASSIP AND 2022 MEDIAN CHUM HARVEST RATES

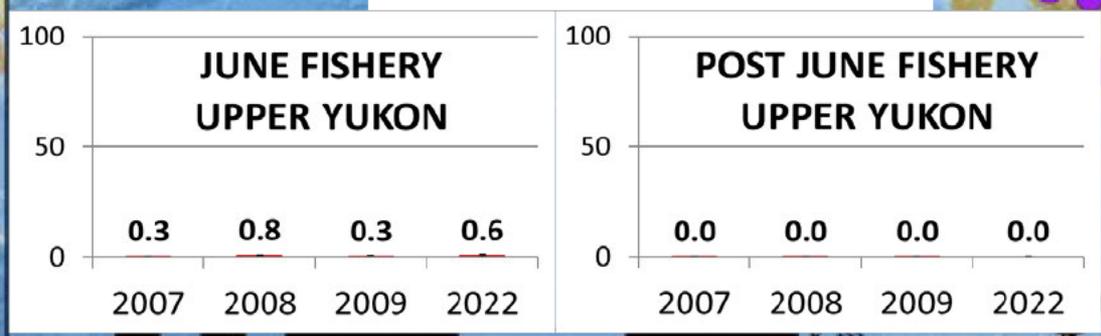
Figure 5.

- Asia
- Kotzebue Sound
- CWAK
- Upper Yukon River
- Northern District
- Northwest District
- South Peninsula
- Chignik/Kodiak
- East of Kodiak



SOUTH PENINSULA FISHERIES

Prepared by Tom Wooding  
 CAMF  
 Source WASSIP, ADFG  
 Regional Information Report  
 No. 5J.23-02



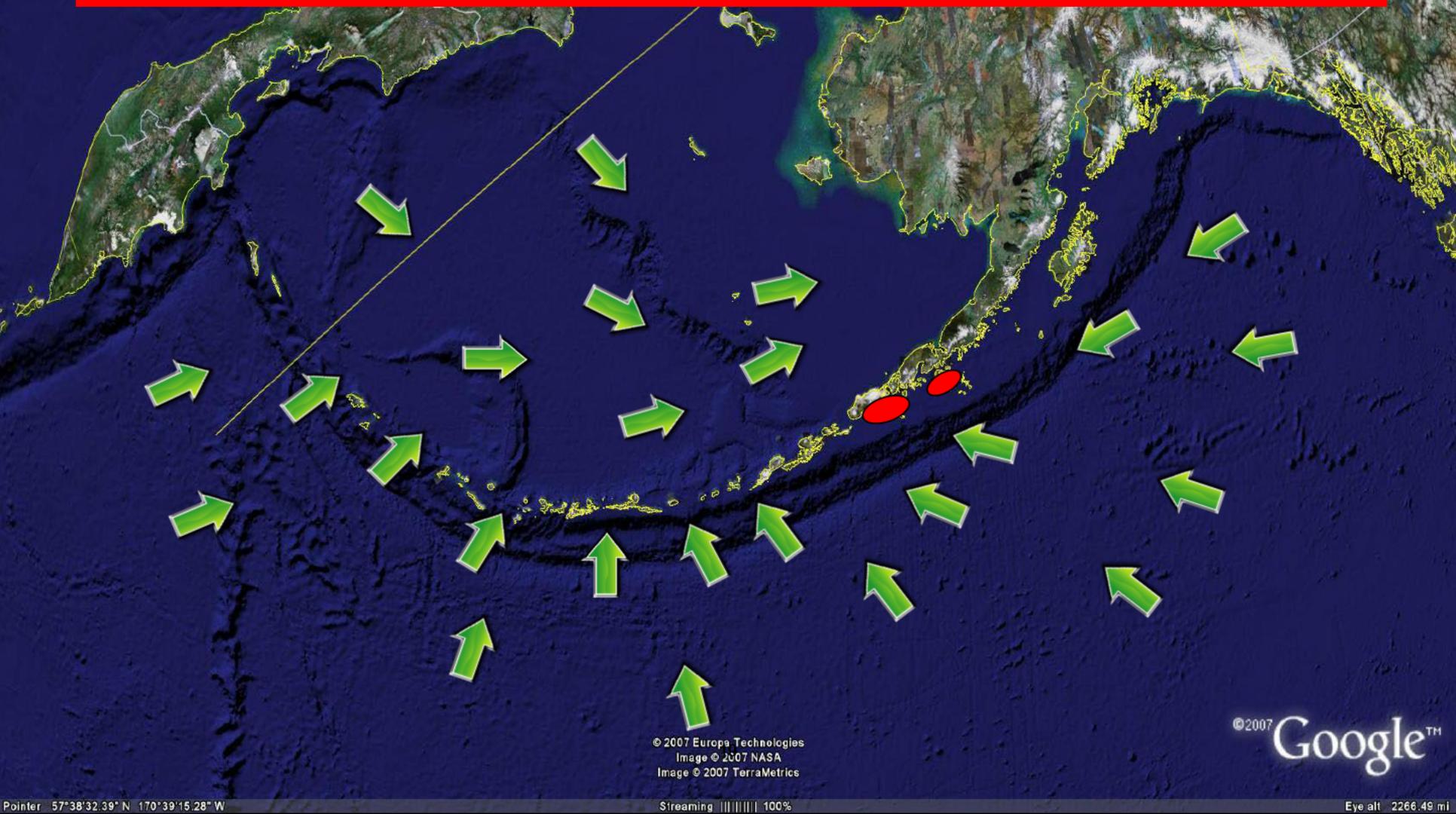
0 300 600 1,200 1,800 2,400 Km

NORTH PACIFIC OCEAN

Vancouver  
 Seattle  
 Portland

Figure 6. Due to the fact the migration occurs on a vast area of the ocean the SUSI June Fishery doesn't have the capability of achieving high harvest rates on a given stock.

**The SUSI June Fishery is very small in size compared to the North Pacific and Bering Sea**

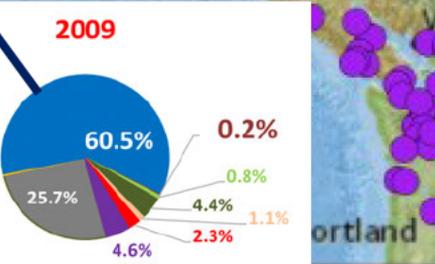
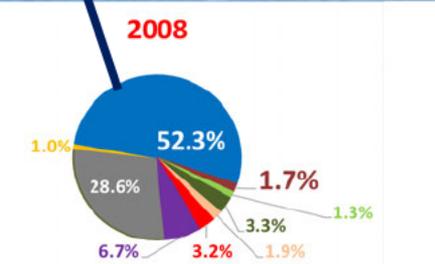
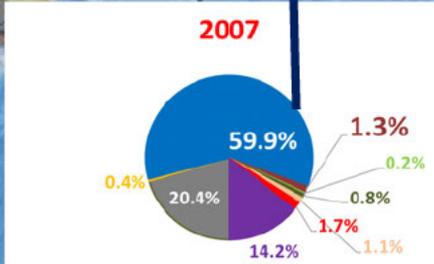
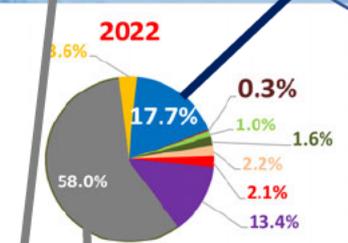
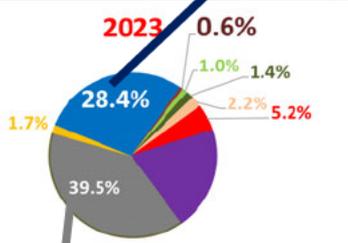
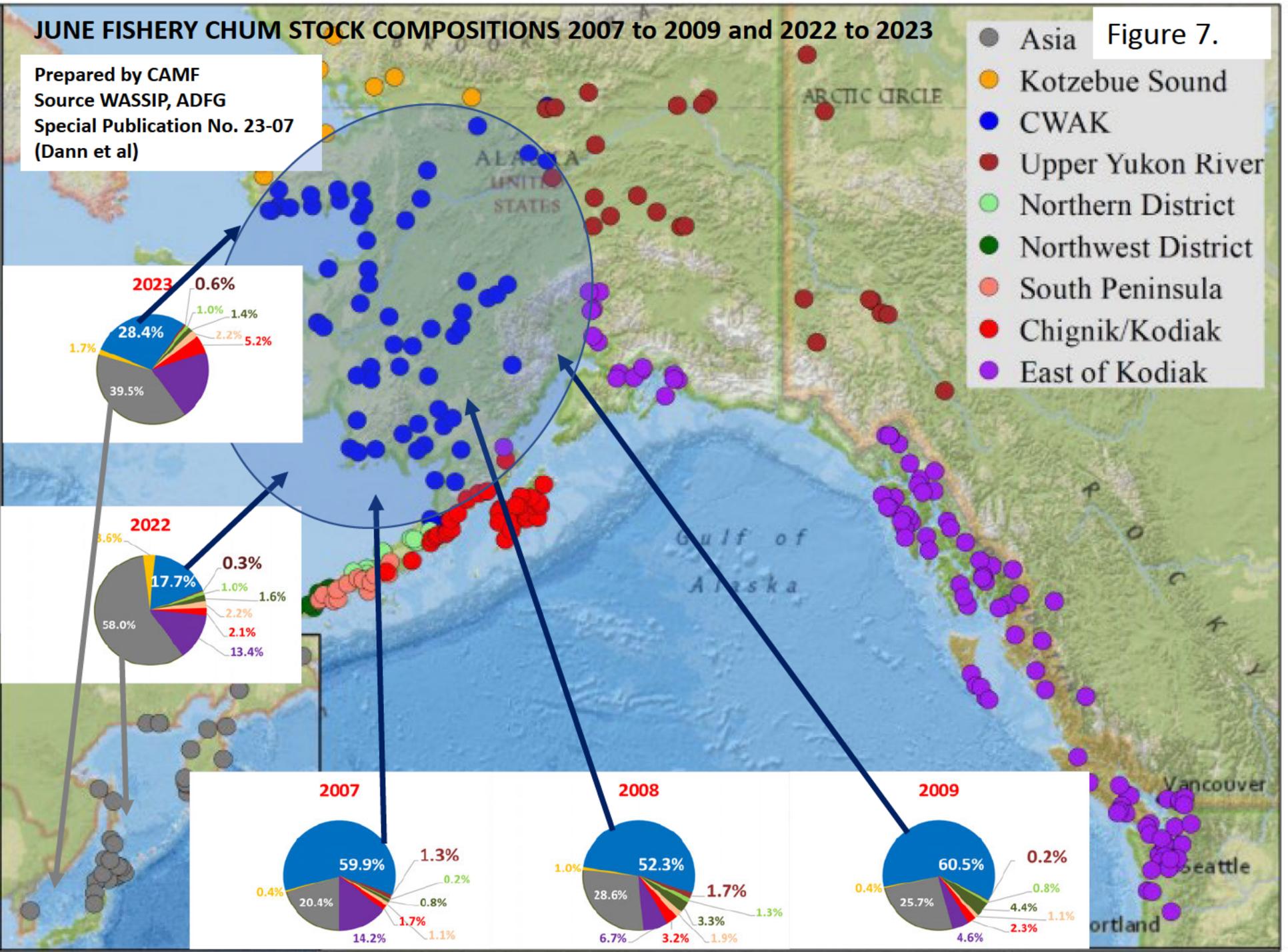


# JUNE FISHERY CHUM STOCK COMPOSITIONS 2007 to 2009 and 2022 to 2023

Figure 7.

Prepared by CAMF  
 Source WASSIP, ADFG  
 Special Publication No. 23-07  
 (Dann et al)

- Asia
- Kotzebue Sound
- CWAK
- Upper Yukon River
- Northern District
- Northwest District
- South Peninsula
- Chignik/Kodiak
- East of Kodiak



**Submitted By:** Paul Crookston

**Community of Residence:** Kenai

**Comment:**

I have participated in the ESSN fishery my entire life including every dip-net opening last season. I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** TED CROOKSTON

**Community of Residence:** KENAI

**Comment:**

ACR 8 Add set beach seine nets as legal gear

**SUPPORT**

I have been an UCI setnetter for 60 years. Our family now has 4 generations of commercial fishing legacy in our history. The serious heart breaking ramifications of the setnet restrictions and closures cannot be overstated and are negatively impacting the lives of many many people, especially a generation of youth who are suffering a great loss and well as the local communities.

We participated in the test fishery on our beach with the set beach seine nets along with some nearby neighbor fishermen and can attest to the effectiveness of this new fishing gear type for enabling 100% safe uninjured release of king salmon while also harvesting reasonable and economically viable amounts of sockeye salmon.

As confirmed by the Department of Fish and Game, ACR 8 meets criterion C to correct an effect on a fishery that was unforeseen when a regulation was adopted. The King Salmon Stock of Concern Plan that was adopted in 2024 will have a devastating effect on the UCI setnet sockeye fishery. The board added commercial dipnets as an alternative gear type in the new regulation but did not have the completed testing information on the set beach seine gear type which was being tested as authorized by two Commissioner's permits (UCI-2024-01 and UCI-2024-03). This new information on the set beach seine nets will have an essential life sustaining effect on the setnet fishery and I urge you to add ACR 8 to this year's meeting agenda for consideration for being added as an alternative gear type prior to the 2025 Eastside Setnet Fishery.

I further urge the board to add ACR 8 to as early an agenda as possible to enable fishermen like myself sufficient time to obtain necessary seine nets, to adapt our gear and to arrange crew commitments for the upcoming season.

ACR 8 is a win win solution that has been brought forward by the hard work, creativity and commitment to this fishery by experienced and capable fisherman working collaboratively together to solve the setnet crisis which has resulted from the decline in king salmon abundance. It enables the traditional setnet harvest of the abundant sockeye which have been grossly over escaping into the river systems and yet fully protects the king salmon by allowing their easy identification and release unharmed.

Thank you for your positive actions in this regard. The actions, by this Board of Fisheries will have dramatic and lasting positive effects on the lives of many many people both directly, in fishing families, and also indirectly, in the surrounding local communities and the local economies and culture.

**PC22**

**Submitted By:** Alan Crookston  
**Community of Residence:** Kenai

**Comment:**

ACR 8 Add set beach seine nets as legal gear

**SUPPORT**

I have been a Cook Inlet setnet fisherman with my family for my entire life. My sons make the fourth generation of this commercial fishing legacy.

I am urging the Board of Fish to support the adoption of ACR 8 and add it to an agenda at the earliest possible opportunity to enable in the coming year so as to make this alternative gear type available for use in the 2025 Eastside Setnet Fishery.

This ACR 8 has been vetted by the Department of Fish and Game to meet criterion C to correct an effect on a fishery that was unforeseen when a regulation was adopted. The King Salmon Stock of Concern Plan that was adopted in 2024 will have a devastating effect on the UCI setnet sockeye fishery. The testing of the set beach seine gear methodology was started several years ago and the most detailed and conclusive testing and scrutiny by the fish and game and the commissioner was completed this summer of 2024. The effectiveness and success of this gear type is new information that was not available to the board earlier in 2024 during the regulatory meetings and hence the board was not able to discuss it. While dipnets were added as an alternative gear type for the King Salmon Stock of Concern Plan the newly tested and proven set beach seine gear type needs to also be added as an alternative legal gear type in order for the setnet fishery to remain viable.

It is of paramount importance the set beach seine nets be approved for use well in advance of the 2025 season. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and proved fully effective for the successful release of all king salmon alive and in excellent condition, and also harvested enough sockeye salmon to make it economically viable. The gear worked on all tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

The positive and longterm effect of establishing the new set beach seine gear type for the setnet fishery is tremendous. Many families and individuals will be significantly benefitted. Thank you for your efforts to make this major sustaining change become a reality.

**Submitted By:** Sarah Crookston  
**Community of Residence:** Kenai

**Comment:**

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Wesley Crookston  
**Community of Residence:** Kenai

**Comment:**

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Luke Crookston  
**Community of Residence:** Kenai

**Comment:**

ACR 8

SUPPORT

I am asking the board to accept the ACR 8 otherwise I will not be able to work as a fisherman with my family like I have always done and want to continue to do.

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

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**PC26**

**Submitted By:** James Crookston  
**Community of Residence:** Kenai

**Comment:**

ACR 8  
SUPPORT

I am a teenager and a 4th generation member of our fishing family. My family can only continue to fish if there is way made possible to use the set beach seine net gear type.

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Nina Crookston  
**Community of Residence:** Kenai

**Comment:**

ACR 8

SUPPORT

I am a Cook Inlet setnet permit holder. I married into a fishing family and my husband has done this his whole life and now our 3 sons are struggling to know if they can continue to work with us because of the restrictions and in fact the full closure.

The set beach seine net gear type option is the very best thing, perhaps the only good thing, to happen to this fishing family in over 12 years.

I cannot possibly convey how much heart ache and anxiety our family has experienced because of the huge abundance of sockeye salmon that we can't fish for like we always have and they are literally being wasted and over escaping up the Kenai river. Now we have a way to harvest sockeye and make absolutely certain that we do not kill any king salmon in the process.

PLEASE PLEASE PLEASE help this setnet fishery. This is a sound valid solution and everyone wins and there is no down side.

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Kathryn Cvitanovich

**Organization:** Trap Point Fisheries

**Community of Residence:** Astoria

**Comment:**

I am a setnet permit holder in Alitak district and I support ACR 15. If you decide to incorporate this issue into your October work session, please accept my comments regarding this matter.

There seems to be a problem with a relatively new interpretation of how our set net fish should be delivered. This interpretation is being used by Alaska State Troopers to write tickets that are confusing and go against what has historically been the practice for many generations of set netters.

I would like to share a situation from this summer, and I do hope that our young neighbor permit holder will be able to submit his experience directly to you. He was issued a ticket that the judge had trouble understanding and the Trooper had trouble articulating. However, instead of throwing it out they decided it was somewhere between falsifying records and fishing without a permit. This young man was facing serious charges for doing what set net fishers have done since before statehood which is to deliver the fish that they have worked together within their family operation to catch. He opted to take a plea deal and the charges were brought down to a violation and pay a fine. However, this should never have happened. He was fishing at family cooperative site just as we do. With all permit holders on site at the fish camp or participating within the same bay.

We need intervention and we need it quickly.

This interpretation will cause much harm to all of our family fishing operations. It will cause further hardship for our fishery and discourage others from participating. There are solutions as noted in ACR 15 that are viable solutions to the challenge we now face. Please consider taking this issue up and helping us continue building a sustainable set net fishery.

**Submitted By:** Nicholas Dowie

**Community of Residence:** Ekuk, Alaska/Laramie, Wyoming

**Comment:**

Public Comment for ACR 15

Immediate families fishing set net operations cooperatively is the status quo. These families work together and very often salmon is co-mingled. This results in efficiency for reducing operating costs, preserving quality, increasing safety, and to not impose an unnecessary hardship on the preciousness of time across all participants in the operation. Many family operations even receive payment for one individual or entity for all landings from all collective permits from their processor, as well as pay their crew from the total catch.

Being a fourth generation Bristol Bay set net fisherman, I know this regulation (5 AAC 39.130) and the burden that it is capable of imposing. I have fished every year of my life and have held an S04T permit for the majority of my years fishing. During this time, I married, had children, and they have likewise become permit holders. Due to the nature of the fishery, we are permitted to be physically present in the vicinity of where the gear is fished and in support of the operation (5 AAC 39.107). This is a critical aspect of the set net fishery, as it sustains the family dynamic and enhances safety, efficiency, and accommodates younger and advance aged permit holders while allowing flexibility for all participants in terms of pregnancy/child-rearing, illnesses, ailments, etc. These specific regulations seem to be in conflict based on original intentions of the law for facilitating the set net fisheries under a cooperative family arrangement.

Specifically, 5 AAC 39.130, can change the logistics flow of salmon from the gear to the tender/processor. There are several work-arounds, such as an Alaska Fish Transporter Permit, but for some operations this can also prove to be difficult by prolonging the transportation and delivery process. In situations where increased weather conditions, proximity of a tender, and unforeseen circumstances, may make the safety of more vulnerable individuals a higher concern.

I support changes to 5 AAC 39.130 to help facilitate the sustainability of family operations.

**Eastern Interior Alaska Subsistence Regional Advisory Council**

**PC30**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
OSM.B24056

October 15 2024

Art Nelson, Executive Director  
Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on two Agenda Change Requests (ACRs) that will be considered during the October 29-30, 2024, Board of Fisheries Work Session.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Alaska Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 8-10, 2024, in Fairbanks. Among the items discussed were proposed Board of Fisheries ACRs. Please see Council comments below for ACRs 1 and 13.

**ACR 1 - Remove restrictions on gillnet mesh-size and length in the subsistence fishery for non-salmon fish in non-flowing waters of the Yukon Area (5 AAC 01.220)**

The Council **opposed ACR 1 on a unanimous vote and does not recommend that it be taken up out of cycle.** This ACR does not meet any of the criteria specified in 5 AAC 39.999. It actually goes against criteria (A) *fishery conservation purpose or reason* and would create further conservation concerns for Yukon Area fisheries. It does not address an immediate need

and therefore does not need to be taken up outside of the regular Arctic-Yukon-Kuskokwim meeting cycle.

**ACR 13 - Reduce maximum depth of hand and purse seines, maximum length of leads, eliminate minimum length of leads, and allow leads to be attached to either end of a seine in the Alaska Peninsula Area commercial salmon fishery (5 AAC 09.332)**

The Council **supported ACR 13 on a unanimous vote and recommends that it be taken up out of cycle.** This ACR meets the criteria outlined in 5 AAC 39.999. ACR 13 specifically meets criteria (A) *for a fishery conservation purpose or reason* and (C) *to correct an effect on a fishery that was unforeseen when a regulation was adopted.*

- For a fishery conservation purpose or reason – Returns of Chinook and fall Chum salmon to the Yukon River drainage have been at historical lows for the past several years. The U.S. has not been meeting escapement goals for Chinook or Fall Chum salmon as outlined in the Yukon River Salmon Agreement and Pacific Salmon Treaty. The cumulative passage of fall Chum Salmon at Eagle Sonar through October 18 is 16,275 fish. This estimate is the lowest on record (1980-2023) and well below the interim management escapement goal of 70,000-104,000 fall Chum Salmon. The Yukon River is experiencing an undeniable salmon crisis that has been acknowledged by all managing agencies and stakeholder groups, including by the Alaska Department of Fish and Game. There are no further conservation measures that can be taken within the Yukon River drainage for Chinook and fall chum salmon; subsistence, commercial, and sport fisheries have all been closed.

Therefore, additional conservation measures outside the drainage must be immediately put in place to help protect and rebuild these stocks. Arctic-Yukon-Kuskokwim (AYK) salmon stocks are intercepted in the Alaska Peninsula Area commercial salmon fishery. A reduction in AYK salmon interception during the South Unimak and Shumagin Islands June fishery can be achieved through the measures requested in ACR 13. Chinook and Chum salmon swim at lower depths than Sockeye and Pink salmon. A reduction in seine depth and length will allow more salmon to return to AYK drainages and contribute to rebuilding severely depleted stocks. Immediate action is required to protect AYK salmon and cannot wait until the next scheduled Alaska Peninsula/Bering Sea-Aleutian Island/Chignik Areas Finfish meeting.

- To correct an effect on a fishery that was unforeseen when a regulation was adopted – when seine net specifications and operations were adopted by the Board of Fish for the Alaska Peninsula Area (5 AAC 39.999) the effects to AYK salmon stocks were unforeseen. Genetic testing since that time has shown that AYK salmon are intercepted in Alaska Peninsula Area commercial salmon fisheries and cause a reduction in the number of AYK salmon that return to their natal streams to spawn. A change to gear

specifications and operations would help correct this effect by reducing interception of AYK salmon in Alaska Peninsula Area commercial salmon fisheries and help more salmon return to AYK drainages. These changes must be implemented as soon as possible to help rebuild depleted AYK salmon and cannot wait to the regularly scheduled Board of Fisheries meeting for the area.

The Council thanks you for the opportunity to comment on these ACRs. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or [brooke\\_mcdavid@ios.doi.gov](mailto:brooke_mcdavid@ios.doi.gov).

Sincerely,



Robert "Charlie" Wright, Sr.  
Chair

cc: Federal Subsistence Board  
Eastern Interior Alaska Subsistence Regional Advisory Council Members  
Chair, Western Interior Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record

**Submitted By:** Travis Every

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

Since 2012 the East Side Set Net Fishery has been the most restricted user group in UCI when it comes to king conservation. Both ADFG and the BOF has told ESSN for over a decade now to come up with a way to harvest sockeye, while conserving late run Kenai River Kings.

As the test study, and observers documentation shows, this alternative gear type does exactly that.

I feel that ACR 8 qualifies under criteria (c) to correct an effect on a fishery that was unforeseen when a regulation was adopted. When the board adopted dip nets as an alternative gear type at the 2024 they did not have the information regarding set beach seines that was produced through the commissioners permits this past summer.

Please support the progression of ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery.

**Submitted By:** Duane Falls

**Organization:** Trap Point Fisheries

**Community of Residence:** Warrenton

**Comment:**

I am writing to support ACR 15. As a permit holder working within a family operation I find this new interpretation making us separate our fish and delivery separately under each permit to be ridiculous. I would not be able to fish as a single permit holder and make a living without a significant income from other sources. Being able to fish together is efficient, safe, and allows young people like me to enter the setnet fishing industry.

I hope that you take into consideration the suggested fixes that were written in ACR 15.

Alaska Board of Fisheries:

I support the Alaska Board of Fisheries working co-operatively with the Commissioner, the Dept. of Law, the Department of Public Safety and CFEC to resolve the issues raised in ACR 15. I'm asking that the Board table discussion of ACR 15 until your March meeting so that your discussion can be informed by ongoing discussions between stakeholders, the Commissioner's office, the Department of Law, the Department of Public Safety and CFEC.

The expectation that a set gillnet permit holders working co-operatively would keep fish caught with each permit separated and then have each permit holder deliver fish at the tender on each permit is a radical change from the status quo. Comingling set gillnet fish from multiple permit holders working co-operatively, mostly in family set gillnet operations, and delivering on a single permit per delivery is how the set gillnet fishery has operated since before statehood. As outlined in ACR 15 as well as amplified by comments from the Northwest Setnetters Association and letters from several stakeholders, there are significant concerns and negative consequences associated with changing Alaska's historical set gill-net fishing practices.

As mentioned in ACR 15, the recent interpretation/emphasis by AWT on separating fish and each permit holder stamping a ticket at each delivery creates significant hardship for those involved in the set gillnet fisheries across the State and threatens the family co-operative fishing way of life. Set gillnet fishing is one of the only land-based commercial fisheries in Alaska. As such, it has many unique characteristics that should be reflected in our understanding and/or refinement of fishing regulations. I believe we should clarify the regulatory structure, which may include some action by the Board, so that the historic set-gillnet fishery is maintained and set-gillnet fishermen fishing co-operatively are allowed to continue to co-mingle their fish and deliver on the permit card of one of the set-gillnet fishermen participating in the co-operative fishery. Why are we making it more difficult for Alaska's set-gillnet fishermen to operate when the Board has recognized that it is increasingly difficult for several of the set-gillnet fisheries to remain viable?

It's my understanding that the Board may be advised that changing the specific regulation identified in ACR 15 (**5AAC 39.130 (2) and (11)**) is within the Commissioner's administrative regulatory authority and outside of the Board's purview since these are "reporting requirements". Nevertheless, I think the Board would have an interest in maintaining Alaska's set-gillnet historical fishing practices and may want to consider regulatory language to supplement the Commissioner's clarification of the 5AAC39.130(2) and (11) reporting requirements. For example, as outlined in ACR 15 possible solution #4, the Board may want to expand your regulations regarding what "legal gear" is for co-operative set gillnet fisheries and, perhaps, adopt language that creates a registration requirement for set-gillnet fishermen fishing co-operatively. Consequently, this is why I'm requesting that the Board table consideration of ACR 15 until your March meeting so that your discussion can be informed by ongoing discussions

between stakeholders, the Commissioner's office, the Department of Law, the Department of Public Safety and CFEC.

If the Board has any additional questions regarding my request for you to table ACR 15, please do not hesitate to contact me. [REDACTED]

Very Truly Yours  
*Duncan Fields*

Duncan Fields

**Submitted By:** Kevin Fisher

**Organization:** Trap Point Fisheries

**Community of Residence:** Akhiok

**Comment:**

I support ACR 15 Set Gillnet Co-Operative Fishing Practices submitted by Northwest Setnetters Association.

I manage our family fishing business Trap Point Fisheries in Moser Bay, Kodiak Alaska.

We are a family owned and operated business. This new interpretation of the law to keep fish caught in each net separated and delivered individually would be a huge hardship for my family.

We need to modify the wording in statute, so that it specifically allows what we have been doing sense before statehood.

**Submitted By:** Judy Fisher

**Organization:** Trap Point Fisheries

**Community of Residence:** Astoria

**Comment:**

I support ACR 15 Set Gillnet Co-Operative Fishing Practices submitted by Northwest Setnetters Association.

I am in my mid 70's and continue to actively fish our family fishing business Trap Point Fisheries in Moser Bay, Kodiak Alaska. That means I am in the skiff along with my husband or crew picking fish together, setting the net, pulling the net, and maintaining the nets. However, I do not always deliver the fish that I hand picked as I have other duties to perform to sustain the operation of our business. It seems absurd that we would each line up and separate our fish to be delivered per permit holder all from within the same bay and within the same skiff and from the same fish camp.

We are a family owned and operated business. This new interpretation of the law to keep fish caught in each net separated and delivered individually would be a huge hardship to continuing our business for future generations.

We need to modify the wording in statute, so that it specifically allows what we have been doing for generations.

**Submitted By:** Edwin Fisher

**Organization:** Trap Point Fisheries

**Community of Residence:** Astoria

**Comment:**

I support ACR 15 Set Gillnet Co-Operative Fishing Practices submitted by Northwest Setnetters Association.

I am 80 years old and continue to actively fish our family fishing business Trap Point Fisheries in Moser Bay, Kodiak Alaska. I am in the skiff along with my wife or other members of our fish camp. However, to require me to get back into the skiff to line up behind my crew to deliver fish that I caught along side them makes zero sense. This will not only put myself and my wife in danger, but all of our family and crew. It will be completely inefficient in running our business. We will have additional fuel cost, safety issues and higher potential for injury, additional damage to our gear, and all around change to our operation for something that is certainly unnecessary. The suggestions in ACR 15 are good suggestions to solve this issue and should be considered quickly to avoid more confusion in the statute.

We are a family owned and operated business. This new interpretation of the law to keep fish caught in each net separated and delivered individually would be a huge hardship to continuing our business for future generations.

We need to modify the wording in statute, so that it specifically allows for the practices we have been doing since before statehood.

**Submitted By:** Sarah Frostad-Hudkins

**Community of Residence:** Kenai, Alaska

**Comment:**

I am writing to you today in SUPPORT of ACR 8 and feel that it meets the criteria to proceed in further discussions.

My name is Sarah Frostad-Hudkins. I am a third generation commercial fisherman and my family has had a presence on Salamatof Beach for over 100 years. This summer we also worked with Brian and Lisa Gabriel as they conducted the Set Beach Seine on our historical beach site.

Is there a fishery conservation purpose or reason?

Yes. The method of using a Set Beach Seine proved to be an effective way to harvest a surplus of Kenai River Sockeye Salmon while successfully releasing all King Salmon in times of King Salmon Conservation.

Does the agenda change request correct an error in regulation? No

Does the agenda change request address and effect of a regulation on a fishery that was unforeseen when that regulation was adopted?

Absolutely! At our 2024 Board of Fisheries Meeting the Board enacted a Stock of Concern Management plan, after closing our fishery until the King Salmon recovery goal was achieved. At this meeting our fleet was encouraged to explore other harvesting methods that would allow our fishery to harvest the surplus of sockeye salmon, while not hurting the SOC. Three Commissioners permits were granted, data was collected and on all sites fished, proved to be a 100% successful way to conduct a fishery. The method of conducting a Set Beach Seine operation was not heard at the 2024 Board of Fisheries Meeting, therefore, this information was not available and is new information.

ACR 8 and the information I shared above shows that this ACR does meet the Agenda Change Request Criteria because the outcome of this method (Set Beach Seine) was not known or discussed at the time of the 2024 Upper Cook Inlet Board of Fisheries meeting and provides the Board new information.

Thank you for your time,

Sarah Frostad-Hudkins

[REDACTED]

PC38

**Submitted By:** Brian and Lisa Gabriel

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

Brian and Lisa Gabriel

[REDACTED]

Kenai, Ak. 99611

Thank you for the opportunity to comment on ACR 8. We are the authors ACR 8 and one of two who were issued commissioner's permits to test Set Beach Seine nets in Upper Cook Inlet this past summer. Our Commissioners Permit Number was UCI-2024-01 and was issued in May of 2024.

The Upper Subdistrict Eastside set gillnet fishery (ESSN) has been closed to the harvest of sockeye salmon for two consecutive years for king salmon conservation. These closures have

resulted in the loss of historical harvest allocation of sockeye salmon to the setnet fishermen that have fished these sockeye salmon stocks for over 150 years and also resulted in a large surplus of sockeye salmon substantially above escapement goals outlined in the Kenai and Kasilof sockeye management plans.

The Board of Fish (BOF) added commercial dipnets for the ESSN as an alternative gear type in 2024 while in the Stock of Concern for King Salmon in Upper Cook Inlet. The purpose of this change was to allow harvest of sockeye salmon while reducing impacts to king salmon for the purpose of king salmon conservation.

At the same meeting, the Board and Department encouraged the public to explore other potential methods through a commissioner's permit. We reached out to Commissioner Vincent-Lange during the March UCI meeting and requested a permit to evaluate set beach seine nets during the 2024 season. The permit was issued in May of 2024 and allowed us to sell sockeye salmon during the season when commercial dipnets were open (3 days per week) to provide for cost recovery of the project.

Additionally, we were allowed to test the set beach seine net on non-commercial dipnet days with the provision that all fish would be released alive or processed and donated, at our expense, in the case of dead loss. We tested the set seine on 3 occasions on non-commercial dipnet days and experienced no dead loss. Our permit required an observer to collect data, paid for by us, to be present whenever the set beach seine net was deployed.

The main goal of the project was to prove that sockeye salmon could be harvested at economical levels while releasing all king salmon alive and viable back into the water. Our permit also allowed us to reach out to other fishermen and test the set beach seine at other beach locations. We tested at two locations on North K-Beach and one location on Salamatof Beach. We reached out to a fisherman on Ninilchik beach to test at their site but were unable to test due to scheduling conflicts.

Another goal was to determine the estimated capital costs to the individual fisherman to convert from a gillnet to a set beach seine net. We expect that seines nets will vary slightly from beach to beach because of water depth, currents, tidal fluctuations, tidal strengths, beach sand type, etc. These variations would revolve mostly around seine length, depth and leadline weight. Regardless of the variations, we feel that fishermen will have the basic components such as corks, corklines and leadlines on hand to convert from gillnets to seines. While most fisherman may not have seine material on hand to replace the gillnetting, our processor expressed interest in providing seine web to their fishermen if set beach seine nets become an alternative gear type while we are in the stock of management concern. The other factor that we determined is that fishermen can use the equipment they currently have to deploy, retrieve and manage the net.

The results of the set beach seine net testing were very encouraging and aligned with the goals outlined in the Commissioner's permit application. We were able to harvest approximately 86,000 pounds of sockeye salmon during 14 fishing openings. Additionally, we captured 13 king salmon with one being classified as a large king (approximately 36 inches). All king salmon were observed and released alive in excellent condition.

We feel that ACR 8 qualifies under criteria (a) for a fishery conservation purpose or reason because the data from the successful testing of the set beach seine nets from this summer do conserve king salmon while harvesting sockeye salmon, which aligns with the goal of the stock of management concern plan.

We also agree with the Department that ACR 8 qualifies under criteria (c) to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

We are asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

Thank you for your consideration.

**PC39**

**Submitted By:** Eric Graves

**Community of Residence:** Wenatchee Wa

**Comment:**

My name is Eric Graves. My son Brandon and I set net in Olga Bay on the south end of Kodiak. Brandon and I each have a permit and we fish four 75f nets.

We support ACR15. We usually work together and pick the four nets out of the same skiff. Our skiff isn't big enough to hold the totes we would need to separate his reds and pinks and my reds and pinks which are ultimately going on the same ledger.

We are also concerned about the extra tender time it would take. Last season we only had one tender and late night deliveries were common. If the tender had to write a ticket for each permit and raise several small bags of fish it would really add to the time it takes to deliver. We believe this would be a safety issue.

Thank you

Eric and Brandon Graves

PC40

**Submitted By:** Khai Harbut

**Community of Residence:** Dow Island, Kenai River, Sterling Alaska

**Comment:**

I am in favor of ACR #9 for the increase of Rainbow bag limits. The river is overrun with rainbow trout. I believe these high numbers of rainbow trout adversely affect the salmon runs of Kings and Silvers.

Thank you,

Khai Harbut

PC40

**Submitted By:** Khai Harbut

**Community of Residence:** Dow Island, Kenai River, Sterling Alaska

**Comment:**

I am in favor of ACR #10 to remove the prohibition of the use of bait on the Kenai River. I do not feel the restriction of bait will help with Silver and King Salmon populations.

Thank you,

Khai Harbut

PC41

**Submitted By:** Sam Haughey

**Community of Residence:** Uyak Bay

**Comment:**

Dear Board of Fish Members,

My name is Sam Haughey. My family has fished in Uyak Bay in the central section of the northwest Kodiak district since 1965. I have spent 59 of my 61 years at fish camp during the summers. We have always been and continue to be a family run operation. My father started the operation and now my wife, Becky and our four children, Abby, Claire, Lauren, and Samuel operate it.

I am writing in support of ACR #14 and ACR #15. Mainly we need the joint venture to optimize the use of our 4 permits. With the added fathoms (25) with the new regulations a joint venture would give our operation an extra 100 fathoms to try and increase our catch. With the slow years

and minimal percentage of the overall catch on Kodiak Island in the past 10 to 20 years we need every advantage possible to increase our catch.

ACR 15 is very critical to our operation due to the logistics of our fishing gear. We send different skiffs in different directions due to multiple factors, (fish, weather, etc.) We are not always able to send the permit holder to their nets every time we pick the nets, although they are present at the site.

I would humbly ask for your support in passing ACR #14 and #15.

Thank You, Sam Haughey

PC42

**Submitted By:** Nathan Hoff

**Community of Residence:** Anchorage

**Comment:**

ACR 4-8

In support of all the work done thus far to experiment with selective gear types in a mixed stock fishery.

Beach seining is reported to have already proven effective and economically viable, and so I look forward to hearing specifics about that fishery. I watched a neighbor fish for about an hour, and they were making reasonable and regular catches. I don't know how effective this form of fishing proved across the season at the various locations at which it was fished.

At the last BOF meeting, I had been discussing the concept of Reef Fishing with the late Paul Shadura. Shadura had suggested that up to perhaps 5 permit holders might utilize and fish the same Reef Seine Apparatus. A similar cooperative effort may end up making more sense economically for a beach seine operation, especially if those fishers are planning to revert back to set gillnets

I participated last season in the commercial dipnet fishery - I believe the author of these proposals has done a very good job of summarizing the dipnet experience and that his proposals taken all together represent a good blueprint by which this fishery could achieve economic viability.

It ought to be remembered that neither dipnets nor beach seines can provide a drop-in replacement for the set net industry. If a beach seine is implemented every 600 feet, that fishery may quickly struggle with viability. There are years or locations when fish do not amass in large numbers at the beach and fishermen such as myself who have not traditionally fished from a beach location.

A few general comments would be that there is already in regulation stipulated that no part of a gillnet is to be fished within 300 feet of an actively fished seine, which I believe quite adequately

directs fishermen on how to operate if both gear types are in the water at the same time. This would mean that a dip net fisherman would pull nets prior to 300 feet or any contact with running lines around an actively fished beach seine.

"Expanding" the fishery to August 15 seems like more of a bookkeeping correction. The inaugural season ended July 31. At the BOF meeting there was some discussion about coho salmon. We now have a season's worth of experience to inform this discussion a bit better. But yes, coho can be released, unharmed in nearly all instances. Our operation encountered 2 coho salmon. Both of these fish were small, less than 5 pounds and likely running with the large sockeye school we were targeting. I have heard some fishermen were fishing with a smaller mesh size and that might be something to pursue more of, especially as we fish into August that is, if nets are seen to do damage to fish that are intended to be released. I did not see any net damage to the small coho we released. I did harvest one coho and that is because I had "bonked" it before considering that it may have been a coho. I mention this as there are always ways to try to improve. In this particular instance, it was simply a failure to adequately consider coho during the peak of harvest and it was not a gear issue. While visiting the beach seine operation, I released a similarly sized coho from their net. This situation was very similar in that their attention was primarily on protecting chinook and the small coho was initially indistinguishable from the sockeye flopping on shore.

Regarding a seine lead. I proposed a lead at the last BOF meeting. Fish and Game staff comments suggest that this was already proposed and discussed. However, my proposal was actually to utilize a seine lead as potentially a blocking lead with gillnets fished on its backside. I transitioned that proposal into a proposal that would have allowed the lead to be fished by commercial dipnet gear once the BOF had voted to approve dip nets on the Inlet.

Whatever was discussed at the BOF meeting I cannot say as it happened late in the meeting; I was no longer present and never heard the discussion. But as the Author of these ACR correctly points out, unknown, unforeseen are going to be the status quo for a nascent fishery and this is the better time to address how this fishery will operate.

One important concept for the proposed lead is to have an open window to allow easy pass through of fish - I might like to suggest language that would allow the use of a lead UP TO A CERTAIN LENGTH after which point a window would be utilized. This shorter lead might be more easily handled and monitored especially by shore based fishermen who might be able to increase their efficiency with a very short lead 5-10 Fathoms (whatever the Board's discretion)

**Submitted By:** Gary Hollier

**Community of Residence:** Kenai

**Comment:**

10/10/2024

Dear Members of the Alaska Board of Fish,

I have been an active participant in the East Side Set Net (ESSN) fishery for 53 years.

I own and operate a large multi set net permit/family business on North Kalifonsky Beach (NKB), statistical area 244-32.

I am submitting this comment for SUPPORT o ACR 8. ACR 8 seeks to add set beach seine nets as legal gear under the Kenai River late-run king salmon stock of concern management plan ( 5AAC21.382).

At the Upper Cook Inlet meeting March 2024, when the late-run Kenai River king salmon was declared a Stock of Management concern, there was much discussion about methods to harvest sockeye in the East Side Set Net (ESSN) fishery, without impacting or harvesting King salmon. At that meeting, set beach seines were not discussed.

In the summer of 2024 there were two experimental beach seine permits, granted by the Commissioner, that actively fished set beach seines in the ESSN fishery.

I received Commissioners permit, UCI-2024-03.

I fished a traditional beach set location and associated blocks and running lines.

I replaced set net gear with 3 1/2in seine web.

As required by the experimental permit, I hired a ADF&G approved and qualified independent observer to monitor all aspects of the fishery.

Over the course of seven days of fishing, we harvested 5,228 sockeye, 205 pinks, 36 coho, and 3 king salmon. The three king salmon were all in the 16 inch size. All the coho and king salmon were released alive, and in great shape.

I believe, as does ADF&G in their Staff comments for ACR 8, that the information and data that was learned with this set beach seine gear operation definitely meets the criteria for an agenda change request. This data and information achieved, was not available and UNFORESEN, when the Board of Fish adopted the Stock of Management concern for late-run Kenai River king salmon, in March 2024.

I would like to thank Commissioner Vincent-Lang and ADFG staff for issuing these experimental set beach seine permits.

I also SUPPORT a version ACR's 4,5, and 6. Their requests for increased fishing times with dip nets in the ESSN fishery meets the criteria for (c) -- address an effect of a regulation on a fishery when the regulation was adopted.

ADF&G staff comments also agree that these ACR's meet the criteria.

Thank you,

Gary L Hollier

Kenai, AK

PC44

**Submitted By:** Jason Hudkins

**Community of Residence:** Kenai, Alaska

**Comment:**

I am writing in to SUPPORT ACR 8.

Last summer our family had the opportunity to participate in the testing of an experimental Set Beach Seine for multiple days on our Salamatof Beach site. What we discovered was a Set Beach Seine is an effective way to target sockeye salmon while having the benefit of live releasing ALL non targeted species in or at the water's edge. I personally participated in the live release of two Chinook salmon. It was a very rewarding feeling to harvest sockeye and have the ability to release healthy and viable king salmon and watch them continue their journey to the spawning grounds. As a fishery we have been asked to find alternatives to indiscriminate gillnets in times of Chinook conservation. A set beach seine alternative, in my opinion and based on data collected, 100% achieves this goal.

a) Is there a fishery conservation purpose or reason?

The main goal of a Set Beach Seine is twofold. First a Set Beach Seine allows the harvest of surplus sockeye salmon in a mixed stock fishery. Second it minimizes interaction with stock of concern Chinook salmon. It also allows for the conservation of all non targeted species. A Set Beach Seine has proven that all incidental catch can be live released in the water and unharmed. The data collected from this last summer will demonstrate this statement to be true.

b) Does the agenda change request correct an error in regulation? No

c) Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when the regulation was adopted?

At the time of the last Board of Fisheries meeting no Set Beach Seine data was available because the Set Beach Seine method had not been tested in the ESSN fishery. I would encourage the

Board Members to look at the data collected last summer, the numbers speak for themselves. The data from testing is new information.

In ending, I would hope that the Board will see that ACR 8 does meet the ACR Criteria and does warrant further discussion in a future meeting prior to the 2025 ESSN season opening.

Thank you for your time,

Jason Hudkins  


PC45

**Submitted By:** Gavin Hudkins

**Community of Residence:** Kenai, Alaska

**Comment:**

My name is Gavin Hudkins, I am a fourth generation fisherman and I am a SO4H permit holder in the Upper Subdistrict of the Central District. I am writing to you today to SUPPORT ACR 8 and believe that this method of using a Set Beach Seine was unforeseen at the 2024 Upper Cook Inlet Board of Fisheries Meeting. Therefore, it meets the ACR Criteria to have further discussions outside of our UCI Cycle.

I had the privilege to work with Brian and Lisa Gabriel as they conducted their Set Beach Seine with the Commissioners Permit. I participated on my family's historical beach site, Salamatof Beach, as well as on the Every's beach site on North K-Beach. Both locations proved to be a successful area to participate in this new fishery and provided harvest of sockeye salmon, while conserving all incidental catch.

I hope that the Board will see that ACR 8 provides new information that was not available at the 2024 Board of Fisheries Meeting and chooses to have further discussion in another meeting before the ESSN 2025 season opening.

Sincerely,

Gavin Hudkins  


**Submitted By:** Steve Irvine

**Community of Residence:** Sterling, AK

**Comment:**

ACR #10

I am in support. However the area of change should be from Moose River to Skilak Lake

Reasons:

The no bait to save the Kings was already tried in this area and a lot of the same reasons were used then. It obviously did not work as they continued to fish for them in the lower river. We now have no Kings. Tried and failed for Kings, will not save the Coho either.

The original proposal for this restriction stated that locals are in support 2 to 1. I am a local and was not aware of this proposal. My neighbors were not aware either and do not support it. I own Dots Keni River Fish Camp, located in the area of bait restrictions. I have hundreds, no, thousands of fishermen and women launching here every season. I have not heard one single person that supports no bait. One exception was a local guide, he reluctantly supported it, but prefers a lower bag limit to help when the fishery is slow.

This regulation also affects elderly, handicapped and young children who cannot stand and cast all day. Sitting and fishing with bait is their only real option for catching fish. This regulation takes away from these users the ability to fish. And gives the other user groups more opportunity.

Bait fishing is the traditional way of fishing on the Kenai river. Catch and release for Rainbows is a relatively new fishery here. Bait fishing goes back to the 1960s and beyond. My parents were here fishing back then and they used bait. My Mom can no longer fish due to the new no bait regulation. She falls into the elderly group that cannot stand and cast.

If we need to scale back, just lower the bag limits during these times. Restricting one type of fishing to give the resource to another is not the answer. It seems to be discriminatory. It does not matter how the fish was caught and killed. Bait, lure or fly, the fish did not spawn.

Just because a group prefers to catch the fish with bait does not make them a bad fisherman, it just means we have a different preference on how we fish. We still are for saving the resource. Just feel everyone should do their share.

There were comments made for proposal 167 at the time the regulations are too fractured. With that logic, I suppose we need the speed limits on our highways to be all the same. We can run 65 MPH from Soldotna to Anchorage. Or, they can just learn how to read the regs, I don't have a problem understanding them. I would prefer to see the same regulations from Skilak Lake to Cook Inlet though.

I saw in the original proposal for no bait they used a study on the Unalakleet river. I worked as a fishing guide from 1985 through 1994 on the Shaktoolik, Ungalik, Inglutalik and Unalakleet

rivers. These rivers are all close together and I can tell you from experinece that they are nothing like the Kenai. I would prefer to use studies from the Kenai river.

The Cooper Landing AC requested these no bait changes. This group is made up of almost all Cooper Landing trout fishing guides. One of them has 13 gudie boats wroking the river, and the rest have a lot of boats too. I have no doubt they are working towards whatever they can do to protect their financial interests and not the resource. The more locals they can get off the river and out of their way the better. Enough of this, the river is not for them alone!

Thank you for your time.

Steve Irvine

[REDACTED]

[REDACTED]

[REDACTED]

Sterling, AK 99672

PC47

**Submitted By:** Faith Ivy

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Tony Jackson

**Community of Residence:** Nikiski

**Comment:**

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Greg Johnson

**Community of Residence:** Vancouver Washington

**Comment:**

Board Members

We have operated a Setnet site on the middle of Kalifornsky Beach . We fish up to seven licenses or 21 nets. If ACR's 4 and 8 were to pass we would likely fish One Beach Seine and Four Dipnets.

We support ACR 8

We feel that ACR 8 will serve as a good platform for discussing and creating a Set Beach Seine Fishery to be utilized within the Stock of Management Concern framework. A few different alternative gears were discussed at the 2024 Upper Cook Inlet BOF , there was little information available about king salmon interaction and those gears. Thankfully, the Gabriels' initiated a testing effort that now brings needed data to the table. We believe there is merit in this ACR and moving it forward to the State Wide meeting is warranted. Our family's Setnet site is 4 miles south of the Proposers testing area on Kalifornsky Beach . Although the dynamics of our beach are slightly different we believe we can employ the Beach seine as tested. We were able to

observe both testers' operations on Kalifornsky Beach and believe we can operate a beach seine with our existing beach equipment

We support ACR 4,5,6

If only one of these ACRs is moved forward we would support ACR 4. We believe ACR 4 encompasses both 5 and 6 for the most part. We attempted the Dip Net Fishery in 2024 with limited success. We had limited success in that it is a low volume fishery and there just wasn't enough fishing time with the low catch rates. One of the reasons The Dip Net fishery was set at 3 days per week was to take a precautionary approach as it relates to King Salmon Handle. Last season we caught Nearly 900 Red salmon and didn't handle a single king salmon. Based on the new information from the 2024 Dip Net fishery we believe it is warranted to take a new look at days per week. As a stand alone fishery we likely wouldn't open up our fishing operation with a season consisting of 3 Dip Net days per week. If ACR 8 and something similar to ACR 4 are passed we intend to utilize both gear types in an attempt to operate a viable operation.

We Support ACR 7

The Department has determined that this ACR doesn't meet the criteria. One reason being the the BOF not supporting the use of Leads at the 2024 UCI BOF meeting. The department also denied a request for a Commissioners Permit for the 2024 season using this same strategy. Of the 21 setnet locations we would normally fish ,19 of them are out of the Beach area or Off Shore locations. Although the Beach area tends to have the highest catch per net the majority of sockeye are caught in this area off the beach in most areas along the beaches. It is critical that alternative gear be developed in the area offshore. The proposer suggest using sites previously utilized for setnets. I would hope the Board can at least revisit the use of leads within the 210 foot space occupied in traditional offshore setnet location. Without further discussion on this matter the department is not likely to provide a Commissioners Permit seeking to develop Alternative Gear utilizing a lead. As an example , if someone wanted to develop a modified Reef Net utilizing leads or Enhanced Dip Netting within the tradition offshore setnet site.

Thank You

Greg Johnson and Family

2024



# 2026-2027 Upper Cook Inlet Finfish Regulatory Meeting Location Proposal

Prepared for Art Nelson, Executive Director  
Alaska Board of Fisheries

PRESENTED BY:

Kenai Peninsula Economic Development District  
Kenai Peninsula Borough  
City of Kenai  
Kenai Chamber of Commerce  
City of Soldotna  
Soldotna Chamber of Commerce



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# 2026-2027 Upper Cook Inlet Finfish Meetings

The Kenai Peninsula Economic Development District supports and advocates for public engagement processes and opportunities for our stakeholders and communities. We formally and respectfully request the Alaska Fish and Game Board of Fish to hold the Upper Cook Inlet Finfish Regulatory meetings for 2026-2027 on the Kenai Peninsula, specifically in Soldotna. This proposal request will outline the history, accommodation, logistic resources, and outlay of permit holders and business operators, as well as resolutions from our municipalities and borough communicating the need for the meeting to be held in Soldotna.

As the Board of Fish makes decisions on fish allocation and management for the commercial and sportfishing industries in the region, it is vital to hold the meeting where the stakeholders, business owners, and waters are. For context, it has been over a decade since the Board of Fish has held any public meetings in this region; the last regular Upper Cook Inlet Finfish meeting was in 1999 with in-person BOF work sessions in 2016 and an Upper Cook Inlet Task Force meeting in 2013. KPEDD respectfully requests the Board of Fish to see this as an opportunity to re-engage and re-establish connections through this public process to proceed with its work to make sound judgments and well-informed decisions and develop comprehensive policy with viewpoints and local perspectives considered.



Director Cassidi Cameron  
Kenai Peninsula Economic  
Development District

## PROPOSAL SPONSORED BY



Mayor Peter Micciche  
Kenai Peninsula Borough



Mayor Brian Gabriel  
City of Kenai



Mayor Paul Whitney  
City of Soldotna



Director Samantha Springer  
Kenai Chamber of Commerce



Director Maddy Olsen  
Soldotna Chamber of  
Commerce

# Cook Inlet Stakeholders

## INDIVIDUALS AND ENTITIES AFFECTED BY MEETING DECISIONS

Permit/License Type Active in 2023	# Registered
Finfish Guides & Charters	197
Drift Gillnets	356
Set Gillnets	672
Purse Seine	68
<b>Total</b>	<b>1,293</b>

85% of active set net permits and 75% of active drift gillnet permits are owned by Alaska residents.

Regional stakeholders require reasonable access to the Upper Cook Inlet Finfish (UCI) Regulatory Meetings, as they are directly affected by decisions made by the Board of Fish. Holding the two-week Board of Fish UCI meetings solely in Anchorage leads to disproportionate representation of special-interest groups that have the resources to attend the meetings and underrepresentation of individual residents of the Kenai Peninsula. Government officials and representatives of these groups have the ability to travel to the Peninsula for meetings as their costs are borne by the organization rather than the individual. The fluidity of these meetings also makes it difficult for residents to make adequate travel accommodations to provide public testimony.

The Kenai Peninsula Economic Development District will act as a point of contact, in partnership with the Kenai Peninsula Borough and regional municipalities, to assist in identifying resources and cost savings for the State. KPEDD will strive to ensure that logistical considerations, adequate public facilities, transportation, lodging and experience are met with the upmost care.



# Upper Cook Inlet

## REGIONAL SIGNIFICANCE

- The Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers, and Fish Creek are the entry points to major sockeye salmon systems in Upper Cook Inlet

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- The Kenai River and its lakes are the primary sockeye salmon producing systems in the Cook Inlet

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- The Kasilof River and Tustumena Lake is the second-most (sometimes the third-most) productive sockeye salmon producing system in Cook Inlet

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- Commercial, sport, subsistence and personal use fisheries are essential to the Kenai Peninsula Economy

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- The value and economic impact goes far beyond the number of permit holders in the region

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**Commercial fisheries land a combined average of 31.3 million pounds of salmon annually, valued on average at 50.1 million USD annually**

The regulatory authority must work alongside industry to protect the Kenai Peninsula's natural resources, communicate on regulatory needs, and receive necessary stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system. Holding the 2026 and 2027 Upper Cook Inlet Finfish Regulatory Meetings in Soldotna would provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources.

# SOLDOTNA FIELD HOUSE



## SIZE

- NEWLY BUILT 40,500 SQ FT MULTI-PURPOSE FACILITY
- 215' X 115' MEETING AREA WITH REMOVABLE TURF SYSTEM
- DIVIDER CURTAINS ALLOWING FOR MULTIPLE MEETING SPACES

## ACCOMMODATIONS

- AUDIO AND VISUAL EQUIPMENT TO SUPPORT MEETINGS AND LARGE EVENTS
- COMMERCIAL KITCHEN ACCESS FOR FOOD SERVICE
- SMALL MULTI-PURPOSE ROOM PLUS ADDITIONAL CONFERENCE ROOMS AT THE SOLDOTNA REGIONAL SPORTS COMPLEX FOR BREAKOUT SESSIONS
- HIGH SPEED WIFI
- KPEDD WILL PROVIDE COFFEE ACCOMMODATIONS FOR THE BOARD & ATTENDEES

## LOCATION

- CENTRALLY LOCATED ON THE KENAI PENINSULA, EASILY ACCESSIBLE BY ROAD AND AIR, WITH MANY AMENITIES AND LODGING OPTIONS NEARBY



# Lodging

The newly remodeled Aspen Hotel is located in the heart of downtown Soldotna, less than five minutes from the Soldotna Field House. The Aspen also offers block rates for local event attendees. There are also 3 other lodging options in Soldotna and 6 in Kenai providing accommodations for out-of-town meeting attendees.

## ASPEN HOTEL - SOLDOTNA

<https://aspenhotelsak.com/soldotna/>

Phone: (907) 260-7736 Address: 326 Binkley Cir, Soldotna, AK 99669

## ALASKA ANGLERS INN - SOLDOTNA

<https://www.anglersinnalaska.com/>

Phone:(907) 420-0500 Address: 44715 Sterling Hwy, Soldotna, AK 99669

## SOLDOTNA INN - SOLDOTNA

<https://www.soldotnainn.com/>

Phone:(907) 262-9169 Address: 35041 Kenai Spur Hwy, Soldotna, AK 99669

## SOLDOTNA INN - SOLDOTNA

<https://www.soldotnainn.com/>

Phone:(907) 262-9169 Address: 35041 Kenai Spur Hwy, Soldotna, AK 99669



ASPEN  
SUITES  
HOTEL

# Lodging

Kenai also offers numerous lodging options, and is less than 15 minutes from the Soldotna event center. A few hotel options include:

## ASPEN HOTEL - KENAI

<https://aspenhotelsak.com/kenai/>

Phone: [\(907\) 283-2272](tel:(907)283-2272) Address: 10431 Kenai Spur Hwy, Kenai, AK 99611

## QUALITY INN - KENAI

<https://www.choicehotels.com/alaska/kenai/quality-inn>

Phone: (907) 283-6060 Address: 10352 Kenai Spur Highway, Kenai, AK, 99611

## KENAI AIRPORT HOTEL - KENAI

<https://www.kenaiairport-hotels.com/>

Phone: [\(907\) 283-1577](tel:(907)283-1577) Address: 230 N Willow St, Kenai, AK 99611

## UPTOWN MOTEL - KENAI

<http://www.uptownmotel.com/>

Phone: [\(907\) 283-3660](tel:(907)283-3660) Address: 47 Spur View Dr, Kenai, AK 99611



# Transportation

Flights operate daily between Anchorage and Kenai through Kenai Aviation and Grant Airlines. There are two car rental centers located in the Kenai Airport, Budget and Avis, for local travel to and from the event. Alaska Bus Company provides shuttle services to and from Anchorage, and Alaska Cab offers shuttle services between and around both Kenai and Soldotna. \* Ground transportation to and from the lodging and venue locations can be arranged if necessary. Details can be organized at a later date \*

## **KENAI AVIATION - 15 FLIGHTS FROM ANCHORAGE TO KENAI DAILY**

<https://www.kenaiaviation.com/> Phone: [\(888\) 505-3624](tel:8885053624)

## **GRANT AVIATION - 30 FLIGHTS FROM ANCHORAGE TO KENAI DAILY**

<https://www.flygrant.com/> Phone: 888-359-4726

## **BUDGET CAR RENTAL - KENAI**

<https://www.budget.com/en/locations/us/ak/kenai/ena>

Phone: (907) 283-4506 Address: 305 N Willow St Ste 116, Kenai, AK 99611

## **AVIS CAR RENTAL - KENAI**

<https://www.avis.com/en/locations/us/ak/kenai/ena>

Phone: [\(907\) 283-7900](tel:9072837900) Address: 305 N Willow St, Kenai, AK 99611

## **AK BUS COMPANY - DAILY SHUTTLE BETWEEN ANCHORAGE AND KENAI**

<https://www.alaskabuscompany.com/> Phone: (907) 299-6806



# Dining

There are more than twenty-five restaurants in and near Soldotna, offering a wide range of local favorites. Fine dining options include Addie Camp, the Flats, and Mykel's. Soldotna also offers casual dining and fast food options for attendees.

## ADDIE CAMP

<https://www.whistlehillsoldotna.com/> Phone: [\(907\) 262-2334](tel:(907)262-2334)  
43540 Whistle Hill Loop, Soldotna, AK 99669

## THE FLATS

<https://theflatsbistro.com/> Phone: [\(907\) 335-1010](tel:(907)335-1010)  
39847 Kalifornsky Beach Rd, Kenai, AK 99611

## MYKEL'S

<https://www.mykels.com/> Phone: [\(907\) 262-4305](tel:(907)262-4305)  
Address: 35041 Kenai Spur Hwy, Soldotna, AK 99669

## ST. ELIAS BREWING

<https://www.steliasbrewingco.com/> Phone: [\(907\) 260-7837](tel:(907)260-7837)  
Address: 434 Sharkathmi Ave, Soldotna, AK 99669

## ODIES

<https://odiesdeli.com/> Phone: [\(907\) 260-9000](tel:(907)260-9000)  
44315 Sterling Hwy, Soldotna, AK 99669

# KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT



PLEASE CONTACT US  
WITH ANY QUESTIONS

CASSIDI CAMERON  
EXECUTIVE DIRECTOR  
CASSIDI@KPEDD.ORG  
(907)519-8637



**Kenai Peninsula Economic Development District, Inc.  
Alaska Board of Fish Upper Cook Inlet Regulatory Meeting  
Venue Request Proposal  
Resolution 2025-01**

**Title:**

The Kenai Peninsula Economic Development District and its Board of Directors are respectfully requesting the 2026 and 2027 Cook Inlet Finfish Meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources and

**WHEREAS:**

The Kenai Peninsula Economic Development District (KPEDD) is a federally appointed Economic Development District and state-recognized Alaska Regional Development Organization tasked with enhancing the quality of life for Borough residents through responsible and sustainable regional economic development and

**WHEREAS:**

KPEDD works alongside municipalities, businesses, industry representatives, and stakeholders to pursue regionally identified goals and priorities and

**WHEREAS:**

The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state and

**WHEREAS:**

The legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources and

**WHEREAS:**

The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and

**WHEREAS:**

The Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet and

**WHEREAS:**

The Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet and

**WHEREAS:**

The Kasilof River and Tustumena Lake are the second-most (sometimes the third-most) productive sockeye salmon-producing system in Cook Inlet and

**WHEREAS:**

Personal use salmon fisheries are essential to the people of the Kenai Peninsula and

**WHEREAS:**

Salmon sport fisheries are essential to the Kenai Peninsula economy and

**WHEREAS:**

Subsistence salmon fisheries are essential for all Kenai Peninsula communities and

**WHEREAS:**

All users of salmon are dependent on an abundance of salmon, and

**WHEREAS:**

According to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited entry fishing permits have been for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide and

**WHEREAS:**

The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans; and

**Now, Therefore Be It Resolved:**

The Kenai Peninsula, Economic Development District formally requests that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system in their region.



Rusty Swan, President

Attested By:



Tim Redder, Secretary

Introduced by:	Mayor, Assembly
Date:	09/03/24
Action:	Adopted
Vote:	8 Yes, 0 No, 1 Absent

**KENAI PENINSULA BOROUGH  
RESOLUTION 2024-039**

**A RESOLUTION ADOPTING JOINT RESOLUTION NO. 2024-002 OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT’S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA, AND ROTATED THEREAFTER AMONG THE THREE PRIMARY AFFECTED BOROUGHES (ANCHORAGE, MAT-SU AND KENAI PENINSULA) TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES**

**WHEREAS**, Joint Resolution No. 2024-002 supports the efforts of the Kenai Economic Development District’s request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH:**

**SECTION 1.** That the Kenai Peninsula Borough Assembly approves and adopts Joint Resolution 2024-002.

**SECTION 2.** That Assembly President Brent Johnson and Mayor Micciche are authorized to jointly sign Joint Resolution 2024-002 on behalf of the Kenai Peninsula Borough. The Assembly hereby approves and incorporates by reference the document titled “2026-2027 Upper Cook Inlet Finfish Regulatory Meeting Location Proposal” accompanying this resolution.

**SECTION 3.** That this resolution takes effect immediately.

**ADOPTED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH THIS 3RD DAY OF SEPTEMBER, 2024.**

---

Brent Johnson, Assembly President

ATTEST:

---

Michele Turner, CMC, Borough Clerk

Yes: Cooper, Cox, Ecklund, Elam, Ribbens, Tunseth, Tupper, Johnson

No: None

Absent: Hibbert



Sponsored by: Administration

**CITY OF KENAI  
RESOLUTION NO. 2024-41**

A RESOLUTION ADOPTING JOINT RESOLUTION NO. 2024-002 OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITY OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES.

---

WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

WHEREAS, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, personal use salmon fisheries are essential to the people of the Kenai Peninsula; and,

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and,

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and,

WHEREAS, all users of salmon are dependent on an abundance of salmon; and,

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited entry fishing permits have been for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and,

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans; and,

WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at Public Discussions Affecting the management of their resources.

Resolution No. 2024-41  
Page 2 of 2

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA:

**Section 1.** That the Kenai City Council adopts and hereby authorizes the Mayor of the City of Kenai to sign Joint Resolution 2024-002.

**Section 2.** That this Resolution takes effect immediately upon passage.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS 4<sup>TH</sup> DAY OF SEPTEMBER, 2024.

  
\_\_\_\_\_  
Brian Gabriel Sr., Mayor

ATTEST:  
  
\_\_\_\_\_  
Michelle M. Saner, MMC, City Clerk



## MEMORANDUM

**TO:** Mayor Gabriel and Council Members

**FROM:** Terry Eubank, City Manager

**DATE:** August 27, 2024

**SUBJECT:** **Resolution 2024-41 - A Resolution Adopting Joint Resolution No. 2024-002 Of The Assembly Of The Kenai Peninsula Borough And The Councils Of The City Of Homer, Kachemak, Kenai, Seward, Seldovia, And Soldotna, Supporting The Kenai Peninsula Economic Development District's Request That The 2026 And 2027 Cook Inlet Finfish Meetings Be Held In Soldotna, Alaska To Provide Resource Stakeholders With The Opportunity To Be Present At Public Discussions Affecting The Management Of Their Resources**

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This memorandum supports the proposed resolution in support of a Joint Resolution, which advocates for holding the 2026 and 2027 Alaska Board of Fisheries Upper Cook Inlet Finfish Regulatory Meetings in Soldotna, Alaska. This initiative, with its potential to significantly impact Kenai residents and the greater community, ensures that local stakeholders have direct access to vital discussions and decisions affecting our salmon resources.

The Kenai and Kasilof rivers are key to the Upper Cook Inlet salmon system, supporting fisheries that are essential to Kenai's economy and community, including personal use, sport, subsistence, and commercial fisheries. Given the importance of these resources, it is concerning that the last meeting held on the Kenai Peninsula was in 1999, with meetings held in Anchorage instead. This location creates a significant burden for Kenai residents, hindering public participation due to the cost and effort required to attend multi-day meetings in Anchorage. It is crucial that our residents have reasonable access to public meetings on issues impacting their economy, livelihood, and lifestyle.

Holding these meetings on the Kenai Peninsula would allow the Alaska Board of Fisheries to engage directly with local stakeholders, including industry leaders, tribal organizations, and local representatives. This would ensure that resource management is informed, balanced, and reflective of diverse community needs.

Supporting this Joint Resolution proposed by the Kenai Economic Development District is a strategic step toward ensuring effective and sustainable management of the Kenai Peninsula's fishery resources. By bringing the meetings to Soldotna, the City will empower local stakeholders, enhance community involvement, and support the long-term health of our salmon fisheries.

This resolution takes a proactive approach to resource management that is in the best interests of the Kenai's economy, culture, and environment.

Your consideration is appreciated.



**KENAI PENINSULA BOROUGH  
CITY OF KACHEMAK  
CITY OF KENAI  
CITY OF HOMER  
CITY OF SELDOVIA  
CITY OF SEWARD  
CITY OF SOLDOTNA**

**JOINT RESOLUTION NO. 2024-002**

A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA, AND ROTATED THEREAFTER AMONG THE THREE PRIMARY AFFECTED BOROUGHES (ANCHORAGE, MATSU AND KENAI PENINSULA) TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES

---

WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

WHEREAS, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, personal-use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

WHEREAS, all users of salmon are dependent on an abundance of salmon; and

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited-entry fishing permits have been issued for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports; provide a platform for public testimony; create and/or update industry regulations; facilitate deliberations from committee members to ensure sustainable salmon returns; and outline management plans; and

WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Peninsula Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA:**

**Section 1.** That the Kenai Peninsula Borough and the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, respectively, formally request that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, and Rotated Thereafter Among the Three Primary Affected Boroughs (Anchorage, Mat-Su and Kenai Peninsula) to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system.

**Section 2.** That this resolution takes effect immediately upon adoption by the City Councils of the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, and the Kenai Peninsula Borough Assembly.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS 4<sup>TH</sup> DAY OF SEPTEMBER, 2024.

  
\_\_\_\_\_  
Brian Gabriel Sr., Mayor

ATTEST:

  
\_\_\_\_\_  
Michelle M. Saner, MMC, City Clerk



PASSED BY THE COUNCIL OF THE CITY OF SOLDOTNA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Paul J. Whitney, Mayor

ATTEST:

\_\_\_\_\_  
Johni Blankenship, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SEWARD, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Sue McClure, Mayor

ATTEST:

\_\_\_\_\_  
Kris Peck, City Clerk

Introduced By:

Mayor

Date:

August 28, 2024

Action:

Adopted as Amended

Vote:

6 Yes, 0 No

CITY OF SOLDOTNA  
RESOLUTION 2024-026

A RESOLUTION REQUESTING THE 2026 AND 2027 COOK INLET FINFISH REGULATORY MEETINGS BE HELD IN SOLDOTNA, ALASKA, TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES

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WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and

WHEREAS, the legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and

WHEREAS, the Kasilof River and Tustumena Lake are the second-most (sometimes the third-most) productive sockeye salmon-producing system in Cook Inlet; and

WHEREAS, personal use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

WHEREAS, all users of salmon are dependent on an abundance of salmon; and

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited entry fishing permits have been issued for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resources which include: a forum for research presentations and staff reports, a platform for public testimony, opportunities to create and/or update industry regulations, deliberations from committee members to increase rates of salmon returns and outline management plans; and

WHEREAS, Joint Resolution No. 2024-002, supports the efforts of the Kenai Peninsula Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SOLDOTNA, ALASKA:

Section 1. That the Soldotna City Council formally requests that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system:

Section 2. That the Soldotna City Council authorizes the Mayor of the City of Soldotna to sign Joint Resolution 2024-002 on behalf of the Soldotna City Council.

Section 3. This resolution shall become effective immediately upon its adoption.

ADOPTED BY THE CITY COUNCIL THIS 28TH DAY OF AUGUST, 2024.

ATTEST:

  
Johni Blankenship, MMC, City Clerk

  
Paul J. Whitley, Mayor

Yes: Carey, Chilson, Hutchings, Nelson, Parker, Wackler  
No: None

**KENAI PENINSULA BOROUGH  
CITY OF KACHEMAK  
CITY OF KENAI  
CITY OF HOMER  
CITY OF SELDOVIA  
CITY OF SEWARD  
CITY OF SOLDOTNA**

**JOINT RESOLUTION NO. 2024-002**

A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA, AND ROTATED THEREAFTER AMONG THE THREE PRIMARY AFFECTED BOROUGHES (ANCHORAGE, MATSU AND KENAI PENINSULA) TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES

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WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

WHEREAS, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, personal-use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

WHEREAS, all users of salmon are dependent on an abundance of salmon; and

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited-entry fishing permits have been issued for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports; provide a platform for public testimony; create and/or update industry regulations; facilitate deliberations from committee members to ensure sustainable salmon returns; and outline management plans; and

WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Peninsula Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA:**

**Section 1.** That the Kenai Peninsula Borough and the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, respectively, formally request that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, and Rotated Thereafter Among the Three Primary Affected Boroughs (Anchorage, Mat-Su and Kenai Peninsula) to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system.

**Section 2.** That this resolution takes effect immediately upon adoption by the City Councils of the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, and the Kenai Peninsula Borough Assembly.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Brian Gabriel Sr., Mayor

ATTEST:

\_\_\_\_\_  
Michelle M. Saner, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SOLDOTNA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Paul J. Whitney, Mayor

ATTEST:

\_\_\_\_\_  
Johni Blankenship, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SEWARD, ALASKA, THIS 9<sup>th</sup> DAY OF September, 2024.

\_\_\_\_\_  
Sue McClure, Mayor

ATTEST:



\_\_\_\_\_  
Kris Peck, City Clerk



Sponsored by: Sorensen

**CITY OF SEWARD, ALASKA  
RESOLUTION 2024-046**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SEWARD, ALASKA, ADOPTING JOINT RESOLUTION NO. 2024-002 OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA TO PROVIDE RESOURCE STAKEHOLDERS THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES**

**WHEREAS**, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and

**WHEREAS**, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and

**WHEREAS**, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and

**WHEREAS**, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and

**WHEREAS**, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and

**WHEREAS**, personal use salmon fisheries are essential to the people of the Kenai Peninsula; and

**WHEREAS**, salmon sport fisheries are essential to the Kenai Peninsula economy; and

**WHEREAS**, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

**WHEREAS**, all users of salmon are dependent on an abundance of salmon; and

**WHEREAS**, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited entry fishing permits have been for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

**CITY OF SEWARD, ALASKA  
RESOLUTION 2024-046**

Page 2 of 2

**WHEREAS**, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans; and

**WHEREAS**, Joint Resolution No. 2024-002 supports the efforts of the Kenai Economic Development District’s request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEWARD, ALASKA**, that:

**Section 1.** The City Council of the City of Seward, Alaska adopts and hereby authorizes the Mayor of the City of Seward to sign Joint Resolution 2024-002.

**Section 2.** That this Resolution takes effect immediately upon passage.

**PASSED AND APPROVED** by the City Council of the City of Seward, Alaska this 9<sup>th</sup> day of September 2024.

**THE CITY OF SEWARD, ALASKA**

Sue McClure  
**Sue McClure, Mayor**

AYES: Osenga, Calhoon, Barnwell, Crites, Finch, McClure  
NOES: None  
ABSENT: Wells  
ABSTAIN: None

**ATTEST:**



Kris Peck  
City Clerk

(City Seal)



**CITY OF HOMER  
HOMER, ALASKA**

City Manager

**RESOLUTION 24-098**

A RESOLUTION ADOPTING JOINT RESOLUTION NO. 2024-002 OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITY OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT’S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES.

WHEREAS, The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and

WHEREAS, The Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula’s natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and

WHEREAS, The Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, The Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, Personal use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, Salmon sport fisheries are essential to the Kenai Peninsula economy; and

42 WHEREAS, Subsistence salmon fisheries are essential for all Kenai Peninsula  
43 communities; and

44  
45 WHEREAS, All users of salmon are dependent on an abundance of salmon; and

46  
47 WHEREAS, According to the Alaska Department of Fish and Game, more than 1,300 drift  
48 and set gillnet limited entry fishing permits have been for the Upper Cook Inlet area,  
49 contributing about 10% of salmon permits issued statewide; and

50  
51 WHEREAS, The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings  
52 provide critical resource updates, including research presentations and staff reports, provide  
53 a platform for public testimony, create and or update industry regulations, deliberations from  
54 committee members to increase rates of salmon returns, and outline management plans; and

55  
56 WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Economic  
57 Development District’s request that the 2026 and 2027 Cook Inlet Finfish meetings be held in  
58 Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at  
59 Public Discussions Affecting the management of their resources.

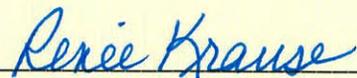
60  
61 NOW, THEREFORE, BE IT RESOLVED that the Homer City Council adopts and hereby  
62 authorizes the Mayor to sign Joint Resolution 2024-002.

63  
64 PASSED AND ADOPTED by the Homer City Council this 9<sup>th</sup> day of September, 2024.

65  
66 CITY OF HOMER

67   
68 \_\_\_\_\_  
69 KEN CASTNER, MAYOR

70  
71  
72 ATTEST:

73   
74 \_\_\_\_\_  
75 RENEE KRAUSE, MMC, CITY CLERK

76  
77 Fiscal Note: N/A



**KENAI PENINSULA BOROUGH  
CITY OF KACHEMAK  
CITY OF KENAI  
CITY OF HOMER  
CITY OF SELDOVIA  
CITY OF SEWARD  
CITY OF SOLDOTNA**

**JOINT RESOLUTION NO. 2024-002**

A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA, AND ROTATED THEREAFTER AMONG THE THREE PRIMARY AFFECTED BOROUGHES (ANCHORAGE, MATSU AND KENAI PENINSULA) TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES

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WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

WHEREAS, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, personal-use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

WHEREAS, all users of salmon are dependent on an abundance of salmon; and

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited-entry fishing permits have been issued for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports; provide a platform for public testimony; create and/or update industry regulations; facilitate deliberations from committee members to ensure sustainable salmon returns; and outline management plans; and

WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Peninsula Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA:**

**Section 1.** That the Kenai Peninsula Borough and the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, respectively, formally request that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, and Rotated Thereafter Among the Three Primary Affected Boroughs (Anchorage, Mat-Su and Kenai Peninsula) to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system.

**Section 2.** That this resolution takes effect immediately upon adoption by the City Councils of the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, and the Kenai Peninsula Borough Assembly.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Brian Gabriel Sr., Mayor

ATTEST:

\_\_\_\_\_  
Michelle M. Saner, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SOLDOTNA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Paul J. Whitney, Mayor

ATTEST:

\_\_\_\_\_  
Johni Blankenship, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SEWARD, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Sue McClure, Mayor

ATTEST:

\_\_\_\_\_  
Kris Peck, City Clerk

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PASSED BY THE COUNCIL OF THE CITY OF HOMER, ALASKA, THIS 9<sup>th</sup> DAY OF September, 2024.



Ken Castner, Mayor

ATTEST:





Renee Krause, MMC, City Clerk

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PASSED BY THE COUNCIL OF THE CITY OF SELDOVIA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Jeremiah Campbell, Mayor

ATTEST:

Liz Diament, City Clerk

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PASSED BY THE COUNCIL OF THE CITY OF KACHEMAK, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Bill Fry, Mayor

ATTEST:

Laurie Wallace, City Clerk

**KENAI PENINSULA BOROUGH  
CITY OF KACHEMAK  
CITY OF KENAI  
CITY OF HOMER  
CITY OF SELDOVIA  
CITY OF SEWARD  
CITY OF SOLDOTNA**

**JOINT RESOLUTION NO. 2024-002**

A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA, AND ROTATED THEREAFTER AMONG THE THREE PRIMARY AFFECTED BOROUGHES (ANCHORAGE, MATSU AND KENAI PENINSULA) TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES

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WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

WHEREAS, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, personal-use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

WHEREAS, all users of salmon are dependent on an abundance of salmon; and

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited-entry fishing permits have been issued for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports; provide a platform for public testimony; create and/or update industry regulations; facilitate deliberations from committee members to ensure sustainable salmon returns; and outline management plans; and

WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Peninsula Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA:**

**Section 1.** That the Kenai Peninsula Borough and the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, respectively, formally request that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, and Rotated Thereafter Among the Three Primary Affected Boroughs (Anchorage, Mat-Su and Kenai Peninsula) to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system.

**Section 2.** That this resolution takes effect immediately upon adoption by the City Councils of the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, and the Kenai Peninsula Borough Assembly.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Brian Gabriel Sr., Mayor

ATTEST:

Michelle M. Saner, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SOLDOTNA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Paul J. Whitney, Mayor

ATTEST:

Johni Blankenship, MMC, City Clerk

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PASSED BY THE COUNCIL OF THE CITY OF SEWARD, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Sue McClure, Mayor

ATTEST:

Joint Resolution No. 2024-XX

Page 3 of 4

Kris Peck, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF HOMER, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Ken Castner, Mayor

ATTEST:

Melissa Jacobsen, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SELDOVIA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

Jeremiah Campbell, Mayor

ATTEST:

Liz Diament, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF KACHEMAK, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

  
Bill Fry, Mayor

ATTEST:

  
Laurie Wallace, City Clerk

Introduced by: Mayor  
Date: 09/09/2024  
Action: Approved  
Vote: 5 Yes, 1 Absent

**CITY OF SELDOVIA  
RESOLUTION 25-11**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SELDOVIA, ALASKA ADOPTING JOINT RESOLUTION NO. 2024-002 OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITY OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT’S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES.**

**WHEREAS**, the functions of the Alaska Department of Fish and Game (ADF&G) Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

**WHEREAS**, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

**WHEREAS**, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula’s natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

**WHEREAS**, the City of Seldovia is located on the southern portion of the Kenai Peninsula and waters of Cook Inlet; and

**WHEREAS**, many local residents are impacted by Upper Cook Inlet Finfish fisheries either directly or indirectly; and

**WHEREAS**, holding the 2026 and 2027 Alaska Board of Fisheries Upper Cook Inlet Finfish meeting on the Kenai Peninsula would improve that access for locals; and

**WHEREAS**, personal use salmon fisheries are essential to the people of the Kenai Peninsula; and

**WHEREAS**, salmon sport fisheries are essential to the Kenai Peninsula economy; and

**WHEREAS**, subsistence salmon fisheries are essential for Kenai Peninsula communities; and

**WHEREAS**, commercial salmon fisheries are traditional and essential for the Kenai Peninsula economies; and

**WHEREAS**, all users of salmon are dependent on an abundance of salmon; and

**WHEREAS**, according to ADF&G, more than 1,300 drift and set gillnet limited entry fishing permits have been for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

**WHEREAS**, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans.

**WHEREAS**, Joint Resolution No. 2024-002 supports the efforts of the Kenai Economic Development District’s Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at Public Discussions Affecting the management of their resources.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SELDOVIA:**

**SECTION 1.** That the Seldovia City Council adopts Joint Resolution 2024-002.

**SECTION 2.** That this resolution takes effect immediately upon adoption.

**PASSED AND APPROVED** by a duly constituted quorum of the City Council of Seldovia, Alaska, on this 9th day of September, 2024.

ATTEST:

  
Liz Diament, City Clerk

APPROVED:

  
Jeremiah Campbell (Sep 10, 2024 15:53 AKDT)  
Jeremiah Campbell, Mayor



**KENAI PENINSULA BOROUGH  
 CITY OF KACHEMAK  
 CITY OF KENAI  
 CITY OF HOMER  
 CITY OF SELDOVIA  
 CITY OF SEWARD  
 CITY OF SOLDOTNA**

**JOINT RESOLUTION NO. 2024-002**

A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA, SUPPORTING THE KENAI PENINSULA ECONOMIC DEVELOPMENT DISTRICT'S REQUEST THAT THE 2026 AND 2027 COOK INLET FINFISH MEETINGS BE HELD IN SOLDOTNA, ALASKA, AND ROTATED THEREAFTER AMONG THE THREE PRIMARY AFFECTED BOROUGHES (ANCHORAGE, MATSU AND KENAI PENINSULA) TO PROVIDE RESOURCE STAKEHOLDERS WITH THE OPPORTUNITY TO BE PRESENT AT PUBLIC DISCUSSIONS AFFECTING THE MANAGEMENT OF THEIR RESOURCES

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WHEREAS, the functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state; and,

WHEREAS, the Alaska State Legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources; and,

WHEREAS, the regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and,

WHEREAS, the Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet; and,

WHEREAS, the Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet; and,

WHEREAS, personal-use salmon fisheries are essential to the people of the Kenai Peninsula; and

WHEREAS, salmon sport fisheries are essential to the Kenai Peninsula economy; and

WHEREAS, subsistence salmon fisheries are essential for all Kenai Peninsula communities; and

WHEREAS, all users of salmon are dependent on an abundance of salmon; and

WHEREAS, according to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited-entry fishing permits have been issued for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide; and

WHEREAS, the Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports; provide a platform for public testimony; create and/or update industry regulations; facilitate deliberations from committee members to ensure sustainable salmon returns; and outline management plans; and

WHEREAS, Joint Resolution No. 2024-002 supports the efforts of the Kenai Peninsula Economic Development District's Request that the 2026 and 2027 Cook Inlet Finfish meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH AND THE COUNCILS OF THE CITIES OF HOMER, KACHEMAK, KENAI, SEWARD, SELDOVIA, AND SOLDOTNA:**

**Section 1.** That the Kenai Peninsula Borough and the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, respectively, formally request that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, and Rotated Thereafter Among the Three Primary Affected Boroughs (Anchorage, Mat-Su and Kenai Peninsula) to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system.

**Section 2.** That this resolution takes effect immediately upon adoption by the City Councils of the Cities of Homer, Kachemak, Kenai, Seward, Seldovia, and Soldotna, and the Kenai Peninsula Borough Assembly.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Brian Gabriel Sr., Mayor

ATTEST:

\_\_\_\_\_  
Michelle M. Saner, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SOLDOTNA, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Paul J. Whitney, Mayor

ATTEST:

\_\_\_\_\_  
Johni Blankenship, MMC, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF SEWARD, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Sue McClure, Mayor

ATTEST:

\_\_\_\_\_  
Kris Peck, City Clerk

PASSED BY THE COUNCIL OF THE CITY OF HOMER, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Ken Castner, Mayor

ATTEST:

\_\_\_\_\_  
Melissa Jacobsen, MMC, City Clerk

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PASSED BY THE COUNCIL OF THE CITY OF SELDOVIA, ALASKA, THIS 9TH DAY OF  
SEPTEMBER, 2024.

  
\_\_\_\_\_  
Jeremiah Campbell (Sep 10, 2024 15:53 AKDT)  
Jeremiah Campbell, Mayor

ATTEST:

  
\_\_\_\_\_  
Liz Diament, City Clerk

---

PASSED BY THE COUNCIL OF THE CITY OF KACHEMAK, ALASKA, THIS XX<sup>ND</sup> DAY OF XXXX, 2024.

\_\_\_\_\_  
Bill Fry, Mayor

ATTEST:

\_\_\_\_\_  
Laurie Wallace, City Clerk



Salamatof Native Association, Inc  
230 Main Street Loop  
Kenai, AK 99611

August 27, 2024

Alaska Board of Fisheries  
1255 W. 8th Street  
Juneau, AK 99811-5526

RE: Upper Cook Inlet Finfish Regulatory Meeting Location 2026/2027

I am writing to support the Kenai Peninsula Economic Development District's submitted proposal to request the Upper Cook Inlet Finfish Regulatory Meetings be held (or circulated on a regular schedule) in the Kenai/Soldotna area. As the CEO/President of the Salamatof Native Association, Inc, I have a vested interest in providing opportunities for our voices to be heard when regulations surrounding natural resource management are discussed.

The resources of our lands are critical to all who call this region home, and it is vital that our stakeholders are represented. The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state. The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system. The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans.

It is for this reason that Salamatof Native Association, Inc is requesting your full consideration of the Kenai Peninsula Economic Development District's proposal to allow our communities to easily access these meetings and share our historical knowledge for stronger management decisions.

Thank you for your time and consideration.

Respectfully,

Christopher Monfor, CEO/President  
Salamatof Native Association, Inc



August 27, 2024

Alaska Board of Fisheries  
1255 W. 8th Street  
Juneau, AK 99811-5526

RE: Upper Cook Inlet Finfish Regulatory Meeting Location 2026/2027

I am writing to support the Kenai Peninsula Economic Development District's submitted proposal to request the Upper Cook Inlet Finfish Regulatory Meetings be held (or circulated on a regular schedule) in the Kenai/Soldotna area. As the Executive Director of the Salamatof Tribe, I have a vested interest in providing opportunities for our voices to be heard when regulations surrounding natural resource management are discussed.

The resources of our lands are critical to all who call this region home, and it is vital that our stakeholders are represented. The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state. The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system. The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans.

It is for this reason that the Salamatof Tribe is requesting your full consideration of the Kenai Peninsula Economic Development District's proposal to allow our communities to easily access these meetings and share our historical knowledge for stronger management decisions.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in dark ink, appearing to read "Eric Morrison". The signature is fluid and cursive, written over a light-colored background.

Eric Morrison  
Executive Director  
Salamatof Tribe





**KENAITZE**  
**INDIAN**  
**TRIBE**

August 28, 2024

Alaska Board of Fisheries  
1255 W. 8th Street  
Juneau, AK 99811-5526

RE: Upper Cook Inlet Finfish Regulatory Meeting Location 2026/2027

I am writing to support the Kenai Peninsula Economic Development District's submitted proposal to request the Upper Cook Inlet Finfish Regulatory Meetings be held (or circulated on a regular schedule) in the Kenai/Soldotna area. As the Council Chair of the Kenaitze Indian Tribe, I have a vested interest in providing opportunities for our voices to be heard when regulations surrounding natural resource management are discussed.

The resources of our lands are critical to all who call this region home, and it is vital that our stakeholders are represented. The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state. The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system. The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans.

It is for this reason that Kenaitze Indian Tribe is requesting your full consideration of the Kenai Peninsula Economic Development District's proposal to allow our communities to easily access these meetings and share our historical knowledge for stronger management decisions.

Thank you for your time and consideration.

Respectfully,

*Bernadine Atchison*  
Bernadine Atchison  
Council Chair

www.kenaitze.org

Phone: 907-335-7200 • FAX: 855-335-8865

P.O. Box 988 • Kenai, AK 99611



August 27, 2024

Samantha Allen  
Executive Director

Alaska Board of Fisheries  
[Redacted]  
Juneau, AK 99811-5526

Board of Directors

RE: Upper Cook Inlet Finfish Regulatory Meeting Location 2026/2027

Melissa Schutter

President

I am writing to support the Kenai Peninsula Economic Development District's submitted proposal to request the Upper Cook Inlet Finfish Regulatory Meetings be held (or circulated on a regular schedule) in the Kenai/Soldotna area. As the Executive Director of the Seward Chamber of Commerce, I have a vested interest in providing opportunities for our voices to be heard when regulations surrounding natural resource management are discussed.

Robbie Huett

Vice-President

Geri Nipp

Treasurer

The resources of our lands are critical to all who call this region home, and it is vital that our stakeholders are represented. The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state. The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system. The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans.

Jena Petersen

Secretary

Stephanie Millane

Hillary Bean

Greg Haas

Kirsten McNeil

Lyrissa Hammer

Matt Cope

It is for this reason that Seward Chamber of Commerce is requesting your full consideration of the Kenai Peninsula Economic Development District's proposal to allow our communities to easily access these meetings and share our historical knowledge for stronger management decisions.

Danny Seavey

Thank you for your time and consideration.

Respectfully,

*Samantha Allen*

Samantha Allen, Executive Director  
Seward Chamber of Commerce



**GREATER SOLDOTNA CHAMBER OF COMMERCE  
RESOLUTION 2024-02**

2026-2027 ALASKA BOARD OF FISHERIES  
REGULATORY MEETING

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**Title:**

Requesting the 2026 and 2027 Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, to provide resource stakeholders with the opportunity to be present at public discussions affecting the management of their resources and

**WHEREAS:**

The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state and

**WHEREAS:**

The legislature created the seven-member Fisheries Board in 1975 with the purpose of conservation and development of fisheries and wildlife resources and

**WHEREAS:**

The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system; and

**WHEREAS:**

The Kenai Peninsula waterways of the Kenai, Kasilof, and Susitna Rivers and Fish Creek are the entry points to significant sockeye salmon systems in Upper Cook Inlet and

**WHEREAS:**

The Kenai River and its lakes are the primary sockeye salmon-producing systems in the Cook Inlet and

**WHEREAS:**

The Kasilof River and Tustumena Lake are the second-most (sometimes the third-most) productive sockeye salmon-producing system in Cook Inlet and

**WHEREAS:**

Personal use salmon fisheries are essential to the people of the Kenai Peninsula and

**WHEREAS:**

Salmon sport fisheries are essential to the Kenai Peninsula economy and

**WHEREAS:**

Subsistence salmon fisheries are essential for all Kenai Peninsula communities and

**WHEREAS:**

All users of salmon are dependent on an abundance of salmon, and

**WHEREAS:**

According to the Alaska Department of Fish and Game, more than 1,300 drift and set gillnet limited entry fishing permits have been for the Upper Cook Inlet area, contributing about 10% of salmon permits issued statewide and

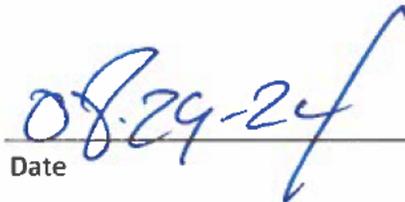
**WHEREAS:**

The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, provide a platform for public testimony, create and or update industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans; and

**Now, Therefore Be It Resolved:**

The Soldotna Chamber of Commerce formally requests that the 2026-2027 Upper Cook Inlet Finfish Regulatory Meetings be held in Soldotna, Alaska, to provide an opportunity for local stakeholders to attend and provide public testimony regarding the management of the salmon system.

  
\_\_\_\_\_  
Chuck Winters  
Board President

  
\_\_\_\_\_  
Date




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*Mission: To support our members through cooperative economic development and community service*

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September 17, 2024

Alaska Board of Fisheries  
1255 W. 8th Street  
Juneau, AK 99811-5526

RE: Upper Cook Inlet Finfish Regulatory Meeting Location 2026/2027

We are writing to support the Kenai Peninsula Economic Development District's submitted proposal to request that the Upper Cook Inlet Finfish Regulatory Meetings be held (or circulated regularly) in the Kenai/Soldotna area. The Homer Chamber of Commerce represents 480 Southern Kenai Peninsula Businesses, and we have a vested interest in providing opportunities for our member's voices to be heard when regulations surrounding natural resource management are discussed.

The resources of our lands are critical to all who call this region home, and it is vital that our stakeholders are represented. The functions of the Alaska Department of Fish and Game Commissioner are to manage, protect, maintain, improve, and extend the state's fish, game, and aquatic plant resources in the interest of the economy and the general well-being of the state. The regulatory authority must work alongside all stakeholders, including industry leaders and local, tribal, and borough organizations, to protect the Kenai Peninsula's natural resources, communicate regulatory needs, and receive critical stakeholder engagement to find best-suited options for the highest economic returns on investment revolving around the Upper Cook Inlet Salmon system. The Alaska Board of Fish Upper Cook Inlet Finfish Regulatory Meetings provide critical resource updates, including research presentations and staff reports, a platform for public testimony, creating and/or updating industry regulations, deliberations from committee members to increase rates of salmon returns, and outline management plans.

For this reason, the Homer Chamber of Commerce is requesting your full consideration of the Kenai Peninsula Economic Development District's proposal to allow our communities to easily access these meetings and share our historical knowledge to make stronger management decisions.

Thank you for your time and consideration.

Respectfully,

Joell Restad  
HCOC Board President

Brad Anderson  
Executive Director



*Connecting Businesses since 1954*

**Alaska Board of Fisheries**

1255 W. 8th Street  
Juneau, AK 99811-5526

**RE: Upper Cook Inlet Finfish Regulatory Meeting Location 2026/2027**

Dear Alaska Board of Fisheries,

I am writing to express my full support for the Kenai Peninsula Economic Development District's proposal to host the 2026 and 2027 Upper Cook Inlet Finfish Regulatory Meetings in the Kenai/Soldotna area. As the Executive Director of the Kenai Chamber of Commerce & Visitor Center, I am deeply invested in ensuring that our community has accessible opportunities to participate in discussions that impact the management of our region's natural resources.

The waterways of the Kenai Peninsula—including the Kenai, Kasilof, and Susitna Rivers, and Fish Creek—are entry points to some of the most vital sockeye salmon systems in Upper Cook Inlet. These systems are essential to the economic well-being of our region. Ensuring that stakeholders from our local, tribal, and borough communities are represented in discussions surrounding the management of these resources is crucial for the health of both our ecosystem and our economy.

The Alaska Department of Fish and Game Commissioner plays a key role in managing, protecting, and improving the state's fish, game, and aquatic resources in the best interest of all Alaskans. It is imperative that these regulatory processes involve close collaboration with industry leaders and local stakeholders to ensure that the Kenai Peninsula's natural resources are managed in a way that maximizes economic returns and promotes sustainability.

Hosting these meetings in Kenai/Soldotna would provide an invaluable platform for our community to contribute our historical knowledge and voice our concerns, allowing for stronger, more informed management decisions. It would also make it easier for local resource users, including those involved in commercial, sport, subsistence, and personal use fisheries, to engage with the regulatory process and ensure that their livelihoods are considered in management plans.

I respectfully request your full consideration of this proposal, as it would enhance accessibility to these critical regulatory meetings and promote greater stakeholder engagement.

Thank you for your time and thoughtful consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Samantha Springer".

**Samantha Springer**

Executive Director

Kenai Chamber of Commerce & Visitor Center

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**Kenai Chamber of Commerce & Visitor Center**

██████████ Kenai, AK 99611

██████████ | [www.kenaichamber.org](http://www.kenaichamber.org)

**Submitted By:** Lisa Gabriel

**Organization:** Kenai Peninsula Fishermen's Association

**Community of Residence:** Kenai

**Comment:**

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited entry permit holders. KPFA is a 501c(6) commercial fishing advocacy group. We also include other Cook Inlet gear types, crewmembers, fish processors, local businesses, and individuals with a general interest in our membership.

The geographical area of the ESSN fishery reaches from Ninilchik in the south to Boulder Point to the north, spanning more than 60 miles along Cook Inlet's Eastside. The salmon harvested by the fishery originate almost exclusively in the Kasilof and Kenai River systems. Some 440 limited entry permit holders, each a small businessperson, fish for salmon in this area and are primarily Alaska residents (86% Alaska, 80% Central Peninsula residents) The season typically lasts from late June until August 15, although that period has been drastically reduced and closed in recent years by regulation and in-season and pre-season management actions.

We are writing today to ask for support of the following ACR's presented to the Alaska Board of Fisheries for consideration at the work session scheduled for October 29-30, 2024 in Anchorage, AK.

ACR 4 – SUPPORT: Extend season dates and increase the number of weekly periods for Upper Subdistrict commercial dip net fishery (5 AAC 21.382)

This ACR seeks to extend the season dates of the commercial dip net fishery from July 31 to August 15 and establish daily periods to be Monday through Sunday from 7:00 AM until 7:00 PM in the Upper Subdistrict while Kenai River late-run king salmon are in stock of concern status.

We agree that the ACR meets criteria C based on the information that the effectiveness and commercial viability of dip net gear in the Upper Subdistrict was unknown at the 2024 Upper Cook Inlet board meeting when the SOC management plan for Kenai River late-run king salmon was adopted.

ACR 5 – SUPPORT: Extend season dates for Upper Subdistrict commercial dip net fishery (5 AAC 21.382)

This ACR seeks to extend the season dates of the commercial dip net fishery from July 31 to August 15 in the Upper Subdistrict while Kenai River late-run king salmon are in stock of concern status. Sockeye productivity does not stop at the end of July. Dipnets are a challenge and the setnetters that participate in the commercial dipnet fishery would like as much opportunity to increase harvest of their allocation of sockeye salmon.

We agree that the ACR meets criteria C based on the information that the effectiveness and commercial viability of dip net gear in the Upper Subdistrict was unknown at the 2024 Upper Cook Inlet board meeting when the SOC management plan for Kenai River late-run king salmon was adopted.

ACR 6 – SUPPORT: Increase the number of weekly periods for Upper Subdistrict commercial dip net fishery (5 AAC 21.382)

This ACR seeks to increase the weekly periods from three up to seven 12-hour periods per week in the Upper Subdistrict while Kenai River late-run king salmon are in stock of concern status.

ACR 6 addresses the need for an extension of days available to dipnet per week for ESSN fishermen. In 2024, weather was a factor on some days that dipnetting was open for ESSN fishermen and prevented an opening. The ACR is seeking the option to have up to 7 openers per week to maximize fishing opportunities to compensate for weather days and to be more productive as a fishery. The reduced efficiency of dipnets

compared to setnets warrants additional fishing opportunities for its participants and allows for more stability as a fishery for that gear type.

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ACR 8 – SUPPORT: Add set beach seines as legal gear under the Kenai River late-run king salmon stock of concern management plan (5 AAC 21.382)

This ACR seeks to add set beach seines as an alternative gear type to the Upper Subdistrict set gillnet fishery while Kenai River late-run king salmon are in stock of concern status (SOC).

The Board of Fish (BOF) added commercial dipnets for the ESSN as an alternative gear type in 2024 while in the Stock of Concern for King Salmon in Upper Cook Inlet. The purpose of this change was to allow harvest of sockeye salmon while reducing impacts to king salmon for the purpose of king salmon conservation.

At the same meeting, the Board and Department encouraged the public to explore other potential methods through a commissioner's permit. Stakeholders reached out to Commissioner Vincent-Lange during the March UCI meeting and requested a permit to evaluate set beach seine nets during the 2024 season.

The project proved that sockeye salmon could be harvested at economical levels while releasing all king salmon alive and viable back into the water. The permit allowed stakeholders to reach out to other fishermen and test the set beach seine at other beach locations. They tested at two locations on North K-Beach and one location on Salamatof Beach and reached out to a fisherman on Ninilchik beach to test at their site but were unable to test due to scheduling conflicts.

The results of the set beach seine net testing were very encouraging to our fishery and aligned with the goals outlined in the stakeholder's Commissioner's permit application. They were able to harvest approximately 86,000 pounds of sockeye salmon during 14 fishing openings. Additionally, they captured 13 king salmon with one being classified as a large king (approximately 36 inches). All king salmon were observed and released alive in excellent condition. It was also shown that fishermen could easily and affordably convert to set beach seines by using existing infrastructure, using existing gear to build a set beach seine and using existing equipment.

We agree with the Department that ACR 8 qualifies under criteria (c) to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

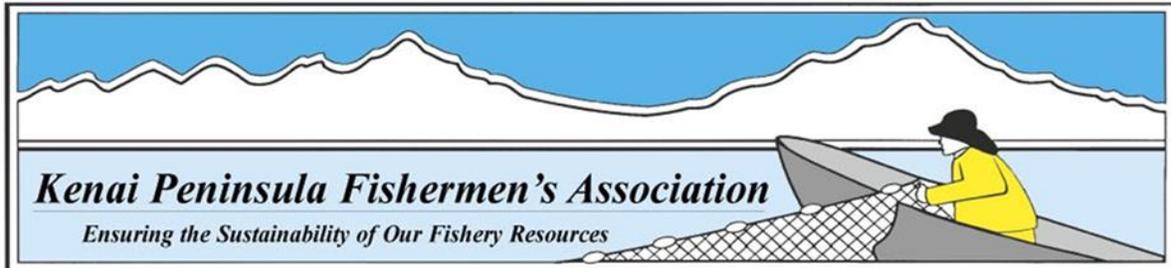
We acknowledge that neither dipnets or set beach seines provide opportunity to obtain the historical levels of allocation of sockeye salmon that the Eastside Setnets have harvested in the past but feel that while we are in the stock of concern, it allows at least some opportunity to our fishermen both on and off the beach locations.

We are asking the Board for due process by moving ACR 4, ACR 5, ACR 6 and ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season for consideration while in the Kenai River Late-Run King Salmon Stock of Concern Management Plan.

Sincerely,

Kenai Peninsula Fishermen's Association Board of Directors

See Attached.



43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276  
 (907) 262-2492 • Fax: (907) 262-2898 • E Mail: [kpfa@alaska.net](mailto:kpfa@alaska.net)

October 15, 2024

Alaska Board of Fisheries,

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Sincerely,

Kenai Peninsula Fishermen's Association Board of Directors

**Submitted By:** Brian Koski

**Community of Residence:** Kenai

**Comment:**

Brian Koski

Support of ACR's 4,5,6,7,8

ACR 4

I support adding additional time. Last year there were several openings when the weather was too bad to use a dip net. I would like to see the openings floating from time based on the tidal cycles. I only support commercial dip netting during Kenai River Chinook stock of concern.

ACR 5

I support adding a longer season. This would increase the harvest of sockeye going into the Kenai and Kasilof rivers. I only support commercial dip netting during Kenai River Chinook stock of concern.

ACR 6

I support adding 7 12hr openings with having the openings around the tidal cycles. This would help with fishing around the weather. I only support commercial dip netting during Kenai River Chinook stock of concern.

ACR 7

I support the idea of using a method like this. I think a deeper discussion would have to be made on the lengths and depths of gear. I only support commercial dip netting during Kenai River Chinook stock of concern.

ACR 8

I strongly support using beach seines. I have witnessed this method; this is a very clean method of harvesting surplus sockeye. I witnessed how you can sort the fish while still in the water. I could see how you can easily live release Chinook. I believe that every beach in the east side could have success in harvesting sockeye and releasing chinook. I only support during Kenai River Chinook stock of concern.

Brian Koski



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**Submitted By:** Gary Koski

**Community of Residence:** Kasilof

**Comment:**

Gary Koski

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Gary Koski



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**Submitted By:** Jens Laipenieks

**Community of Residence:** Anchorage

**Comment:**

These comments pertain to ACR 9 and 10.

Both of these change requests would be devastating to the trout and dolly populations in the Kenai. The trout fishery is a world class resource that is truly unique. Allowing increased take of larger rainbows, and increased mortality on all sized fish due to bait ingestion, would quickly put an end to the great economic and social benefits of the rainbow fishery.

If the objective is to increase silver salmon populations, I would recommend a close look at the increase in seal predation on both trout and salmon in the middle and lower Kenai. The seals push the silvers into the shallowest water, where they eventually spawn, and within a few weeks the water drops and their redds and eggs are dry and frozen.

To even consider ACR 9 and 10 would be a tragic mistake, and I implore you to reject them both.

Thank you for your consideration.

**Submitted By:** Kelly Lindow

**Community of Residence:** Soldotna

**Comment:**

I support ACR 9 and 10 ....been fishing the Kenai most all my life and I'm 65 years old !!

**Submitted By:** George Macey

**Organization:** Beaver Dam Fisheries

**Community of Residence:** Juneau

**Comment:**

We need definition clarification or modification of SAAC 39.130 (2) and (11) concerning "unit of gear" for set gillnet fishermen fishing. As it is, now newly interpreted by the assistant attorney general, we would all be criminals.

1)CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: **Definition clarification or modification of 5AAC 39.130 (2) and (11) concerning "unit of gear" for set gillnet fishermen fishing co-operatively.**

2)WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

**All of the fish caught by co-operative set gill-net fishing operations are accounted for and are reported to fisheries managers for management purposes.**

**Recently, an Assistant Attorney General issued a letter indicating that "it is not ok to have one permit holder collect all the fish from various permit holders and fishing sites and deliver on a single fish ticket with a single permit holder's name and CFEC number as if one person alone caught all the fish." "We expect that your clients too will comply with these statutes and regulations, and if they do not, they should expect to be charged."**

**This interpretation by the AAG illustrates an unfamiliarity with the logistics and equipment utilized while fishing gill-net. Set-Net Gillnetters have been compliant with fisheries policies for generations. Should the AAG's interpretation of "Unit of Gear" be implemented, this would create a hardship on families and business that have been operating in good faith with ADFG and Board of Fishing for generations, and would make their historical operating practices suddenly illegal.**

**"Unit of Gear" is not defined in regulation.**

3)WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

1. The most utilitarian solution would be to define "unit of gear" as follows: **"For set gill-net fishermen fishing multiple limited entry permits co-operatively, "unit of gear" is defined as all set gill-net gear being fished by those permit holders working co-operatively and commingling their catch."**

4)STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason: **There is not a conservation concern related to this request.**

b) to correct an error in regulation: **The lack of a clear definition of "unit of gear" has emphasized an apparent "error" in regulation.**

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted: **The change of the interoperation of "unit of gear" is an unforeseen issues that has come about with the absence of a clarifying language in the last board of fisheries cycle, regarding "Unit of Gear." It is important to make sure that changes to language is clarified as to not punish family businesses and set-net fisheries for operating as they have for many years.**

5)WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

**Should this new interpretation of Unit of Gear be implemented, Set-net fishermen and families will, in effect, be punished for operating cooperatively as they have for over 60 years. This will also change completely the actual ability to use the gear, specifically holding skiffs, for people that multiple permits in their operations. This will create unnecessary financial burdens on families that have been operating in good faith with state regulations for many decades.**

**This is an issue that shows a disconnect between law makers and the generational practices of set-net fishing practices. Putting this new interpretation of what "unit of Gear" is, would result in the citations of hundreds of people that are already struggling to contribute to an Alaskan industry that is already struggling to exist. Waiting until the next cycle to make this change would result in unnecessary hardships to families and business entities that aim to support an important part of the Alaska economy, in a manner and practice that they have carried out for many generations.**

6)STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. Another gear type does not benefit from regulatory clarification or definition of "unit of gear", consequently the ACR is not allocative.

7)IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

Not Allocative

8)STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

I have fished as a set netter since 1995. I recently purchased my own set net fishing operation in Deadman Bay on the South end of Kodiak Island. In my years of experience we have always operated for our safety first and within the scope of good practices set forth by the fisheries department when it comes to the long history of understanding that "Unit of Gear" means that the whole operation wether it be one permit or multiple permits owned by a legal business entity (or in many cases a family business), that all permits fished under that entity cooperatively, operate with the same units of gear. I am in the process of purchasing another permit, this change in the understanding of "unit of gear" would create a unnecessary hardship on a small fledgling business that is trying to grown. This is a case of, "if it is not broke, there is no need to fix it."

9)STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING. I do not know if the Fisheries Board has considered this issue previously.

Submitted by:

NAME George Macey Beaver Dam Fisheries LLC, Kodiak South End Setnetter

**Individual or Group**

[Redacted] Juneau, AK 99801

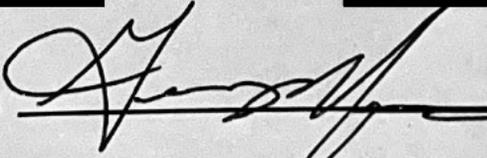
**Address**

**City, State**

**Zip**

[Redacted]

[Redacted]

SIGNATURE:  DATE: 10/15/24

Note: Addresses and telephone numbers will not be published.

Mail, fax, or upload this completed form to:  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**Submitted By:** Branda Madrid

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.



## 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)

To: Alaska Board of Fisheries

From: Matanuska-Susitna Borough Fish & Wildlife Commission

Date: September 26, 2024

Re: Support of Agenda Change Request #3

The Matanuska Susitna Borough Fish and Wildlife Commission (FWC) supports Agenda Change Request #3 (ACR 3) recommending the designation of Little Susitna River coho salmon as a Stock of Yield concern. In consideration of the regulatory Yield Concern definition in 5AAC 39.222 the Policy for Management of Sustainable Salmon Fisheries (SSFP), we believe this definition clearly fits the current run status of the Little Susitna River coho salmon. This is supported when reviewing historic sport coho salmon harvests from the river compared to recent harvest trends. We also agree with the proponents of ACR 3 that the current situation is an accelerating concern, and if it is not addressed immediately, could possibly lead to a Management Concern before the next Upper Cook Inlet Board of Fisheries meeting.

We believe it imperative the Board focus on the regulatory language in 5AAC 39.222 (42):  
*“‘yield concern’ means a concern arising from a chronic inability, despite the use of specific management measures, to maintain expected yields, or harvestable surpluses, above a stock’s escapement needs; a yield concern is less severe than a management concern, which is less severe than a conservation concern.”*

ACR 3 demonstrates the current level of lost yield compared to a 5-year period (2000-2004) with good public access through the Little Susitna River Public Use Facility and a two coho salmon daily sport bag limit. During this period, harvest estimates ranged from 13,672 to 20,357. In reviewing the attached historical harvest data from the Alaska Department of Fish and Game (ADF&G) you will note even higher coho harvests from 1991- 1996. For a 24-year period from 1988 - 2010 there were only 4 years with sport coho salmon harvests less than 10,000 fish, with the lowest harvest estimate of 7,497 occurring in 1990. This data clearly supports the Little Susitna River’s long history of strong coho salmon production and yield in the sport fishery. It is very concerning comparing historical data to the most recent 5-year period which estimates the Little Susitna River coho salmon harvests (2019 - 2023) averaging only 2,499 coho salmon per year.

We agree there is management uncertainty, with high water events partially compromising coho salmon weir counts from the Little Susitna River. Incomplete escapement counts may cause

*Providing Outstanding Borough Services to the Matanuska-Susitna Community.*

uncertainty in consideration for **Stock of Yield/Management Concern**. However, the low weir counts in 2022 - 2024 are supported by low, and continually declining yield as clearly indicated by the in-river sport fishery. The SSFP fully supports this as a yield concern and should be designated as such and an action plan developed, for what has historically been one of the most significant and productive coho salmon stocks in Upper Cook Inlet.

Therefore, the FWC unanimously supports ACR 3, and encourages the Board of Fisheries to give it full consideration (for conservation reasons) and schedule it to be heard during the 2024 / 2025 Board meeting cycle.

Sincerely,



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

Sponsored by: Assemblymember Gamble  
Adopted: 10/01/24

**MATANUSKA-SUSITNA BOROUGH  
RESOLUTION SERIAL NO. 24-107**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY URGING THE ALASKA BOARD OF FISHERIES TO APPROVE AGENDA CHANGE REQUESTS ACR 2 AND ACR 3 WHICH WERE PREVIOUSLY SUBMITTED AND DESIGNATE THE SUSITNA RIVER DRAINAGE CHINOOK SALMON AND THE LITTLE SUSITNA RIVER COHO SALMON BOTH AS A STOCK OF YIELD CONCERN AND ADOPT REGULATORY ACTION PLANS TO REBUILD THE YIELD FOR BOTH STOCKS.

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WHEREAS, on August 23, 2024, the Matanuska-Susitna Borough Fish and Wildlife Commission submitted an Agenda Change Request form to the Alaska Board of Fisheries (Attached to IM 24-188); and

WHEREAS, that request was to "Designate the Susitna River drainage Chinook Salmon as a Stock of Yield Concern and adopt a regulatory Action Plan to rebuild the yield from this salmon stock;" and

WHEREAS, the Request detailed the nature of the current problem with references to data and standards; and

WHEREAS, as pointed out in the Request form, "even with no sport harvest allowed in 2023 and 2024, not a single Chinook salmon spawning escapement goal was attained anywhere in the Susitna River drainage;" and

WHEREAS, it is clear there is a dire and urgent need for the State Board of Fisheries to address the issue; and

WHEREAS, the Agenda Change Request submitted by the Matanuska-Susitna Borough Fish and Wildlife Commission has been

designated ACR 2 for the upcoming meeting of the Alaska Board of Fisheries; and

WHEREAS, on August 29, 2024, the Matanuska-Susitna Borough Alaska Delegation, comprised of the House and Senate Members of the Alaska Legislature, submitted an Agenda Change Request form to the Alaska Board of Fisheries (Attached to IM No. 24-188); and

WHEREAS, that Request was to "Designate the Little Susitna River coho salmon - a Stock of Yield Concern and adopt a regulatory Action Plan to rebuild the yield from this important salmon stock, as measured by the sport coho salmon harvest within the Little Susitna River;" and

WHEREAS, the Request detailed the nature of the current problem with references to data and standards; and

WHEREAS, as pointed out in the Request form, "For the most recent 5-year period Little Susitna River sport coho salmon harvest has declined by over 85 percent compared to the 2000 - 2004" and "the preliminary harvest estimate of 1,095 coho salmon for 2023 was already the lowest sport Little Susitna River coho salmon harvest estimate on record since 1977!;" and

WHEREAS, it is clear there is a dire and urgent need for the Alaska Board of Fisheries to address the issue; and

WHEREAS, the Agenda Change Request submitted by the Matanuska-Susitna Borough Alaska Delegation has been designated ACR 3 for the upcoming meeting of the Alaska Board of Fisheries.

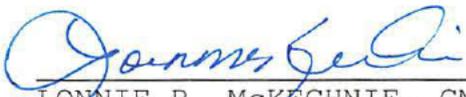
NOW, THEREFORE, BE IT RESOLVED, the Assembly supports Agenda Change Requests ACR 2 and ACR 3 submitted by the Matanuska-Susitna Borough Fish and Wildlife Commission and the Matanuska-Susitna Borough State Delegation and urges the Alaska State Board of Fisheries to grant both change requests.

BE IT FURTHER RESOLVED that the Assembly urges the Alaska Board of Fisheries to designate the Susitna River drainage Chinook Salmon and the Little Susitna River Coho Salmon both as a stock of yield concern and adopt regulatory action plans to rebuild the yield for both stocks.

ADOPTED by the Matanuska-Susitna Borough Assembly this 1 day of October, 2024.

  
EDNA DeVRIES, Borough Mayor

ATTEST:

  
LONNIE R. McKECHNIE, CMC, Borough Clerk

(SEAL)



PASSED UNANIMOUSLY: Hale, Nowers, McKee, Gamble, Fonov, and Bernier

**Submitted By:** Charles McCrone  
**Community of Residence:** Kasilof

**Comment:**

Dear Board of Fisheries Members,

This request is being written to appeal for an Agenda Change Request in order to review and rescind the Board's adoption of Proposal 167 during the last regulatory cycle. My request is based on the following criteria from the Board's email dated 08/26/2024.

"To correct an effect on a fishery that was unforeseen when a regulation was adopted.

In addition to the above criteria, the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information found by the board to be compelling."

The unforeseen effect that this regulation imposes is the consequences that it has on elderly and handicapped anglers who have lived and fished within the restricted area for their entire lifetimes, and who are unable to effectively transition to the restrictions imposed by Proposal 167. These people were blindsided by the regulation change and have formed Sterling Sportfishing Support in order to protest the actions taken to get the proposal approved. The proposal was written by a group of guides who were inconvenienced by the residents fishing with bait in the areas where they guide for profit.

The proposal was officially opposed by the Alaska Department of Fish and Game, who wrote in their comments to the board that it would "add further restrictions to methods and means without biological justification."

In addition, the Alaska State Constitution, Article 8 clearly states:

§ 3. Common Use

Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.

§ 4. Sustained Yield

Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

Proposal 167 transfers the priority of allocation from resident sport and subsistence fishermen to a self-serving group of guides who will benefit economically from the change. The proposal proponents offer no data that "high grading" exists, or that fishing with bait adversely affects the Kenai River King Salmon or Silver Salmon fishery. They have effectively stolen the rights of residents for their own selfish interests. This is what I hope will compel the Board to reconsider and reverse the injustice imposed by Proposal 167.

I am attaching a link to a newspaper article which articulates the negative impact this regulation has on the residents, while favoring many guides who are non-residents.

<https://www.homernews.com/news/sterling-fishers-seek-reversal-of-new-kenai-river-bait-restrictions/>

I would like to also note that Silver Salmon is available for sale at Freddie's for \$10.99/ pound, even though this is the first year in fifteen that I have not been able to catch a single one. It seems to me that the application of restrictions is imbalanced.

Thank you for your consideration of my concerns. I am thankful that we live in a society where we can protest when we see an injustice, and take steps to rectify it. Thank you for your time!

Respectfully,

Charles McCrone

**Submitted By:** Karen McGahan

**Community of Residence:** Nikiski

**Comment:**

Comments due tonight for ACR8 for set beach seines. Comment:

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Tollef Monson

**Community of Residence:** Kodiak

**Comment:**

I am writing in support of ACR # 14 and ACR # 15 in order to keep fishing families together. This is not a consolidation of gear or permits nor a barrier to entry for new participants. These allowed continued participation in a dieing fishery and I will not personally benefit from it either ACR.

Thank you

Dear Chair and Members of the Board of Fish:

I am writing in support of ACR # 14 and ACR # 15.

I have been setnetting in Kodiak since age three. My parents chose setnetting over the seining and halibut fishing my father had been doing previously so that he could be together with the family. Now in my 40's, I own and operate the site, and am teaching the 3<sup>rd</sup> generation – my three nieces – to fish. This family/intergenerational nature of setnetting is what makes it such a vibrant piece of the fabric of Kodiak. I am supporting both of these ACR's with this in mind, because they will both help to keep this kind of fishing possible.

Regarding # 14, when my father's health was starting to slip and I was too busy to take over the permit, he did a joint venture with our neighbors as a way to share responsibility for the gear while still remaining an active participant in the fishery. In this example, the joint venture was a wonderful tool for our family. However, he never would have considered doing a joint venture if it meant they would lose out on total length of gear allowed. I hope that it can continue to remain a tool for permit holders. I appreciate that this ACR doesn't add any gear to the water that isn't already allowed. It simply fixes the mismatch that currently exists between length of gear per permit holders fishing with and those fishing without a joint venture.

Although I am in the minority of setnetters in the Northwest Kodiak district in that my fish site only has one permit, I have benefitted from the ability to comingle fish from 2 permits and deliver on one permit as addressed in ACR # 15. As I was just beginning my journey as site owner, having taken over from my parents, I worked with my crew member to lease a 2<sup>nd</sup> permit for two seasons. She and I fished it together with my own permit. This additional permit and income was a large part of what made the transition to being a site owner possible for me financially. I would not have been able to do it, though, if I would have had to keep all the fish separate. Between three of us, there were not enough hands to run another skiff to hold the second permit's fish. In addition, I have a holding skiff which runs refrigerated sea water to chill the fish while I wait the sometimes 36 hours between tender pickups. This holding skiff is not designed with enough room to keep all the fish in separate bags. Finally, there were a few occasions where the other permit holder (who was slightly accident prone) was unable to get in the skiff due to injuries. She would be doing important work on shore, mending nets and cooking, but physically was not able to get her hands into gloves or her back to allow movement required for fishing. Troopers could easily have checked that she was on site, but she was not able to physically get to the tender to sign a fish ticket.

I support ACR # 15 because I hope that another new entrant into the fishery could have the same opportunity that I had to fish multiple permits and have a small financial boost that way. I hope that those operations that have had multiple permits for decades can continue to fish the way they always have. I am afraid that if our fishery becomes less and less productive because people can't share the burden as they have been doing, there will be

less incentive for processors to buy our fish, and suddenly the setnet fishery becomes obsolete.

I appreciate the board's consideration of our family-oriented fishery and these simple fixes. I believe protecting the smallest-scale harvesters is a worthy reason to support ACR # 14 and # 15. We are not asking for anything other than to maintain the way things have been for generations.

Thank you,

Adelia Myrick



To: The Chair and Members of the Board of Fish

From: Northwest Setnetters Association

Date: October 14, 2024

Re: SUPPORT for ACR # 14 and ACR # 15

The Northwest Setnetters Association appreciates the opportunity to provide comments in SUPPORT of ACR # 14 and ACR # 15. This memo provides background and rationale for each of these ACR's, beginning with ACR # 14 and concluding with ACR # 15.

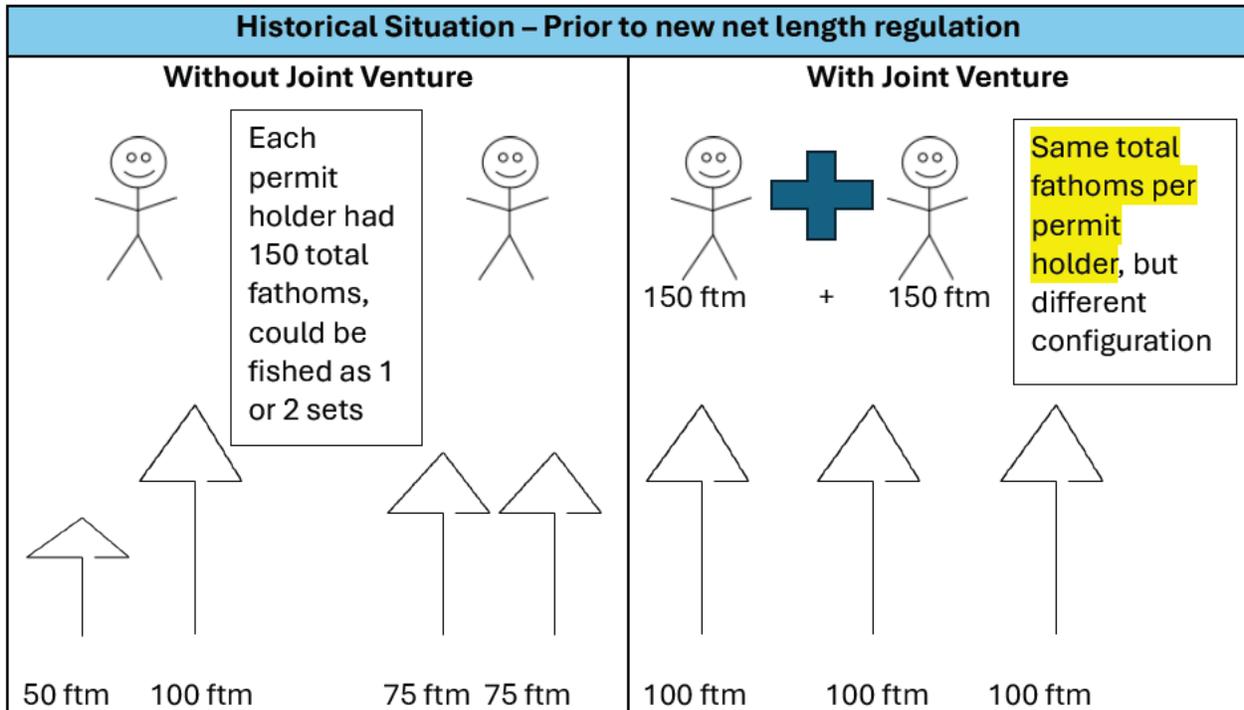
Both ACRs address issues important to the majority of setnet operations in the Central Section of the Kodiak District, more than 70% of which are multiple-permit, family-centered operations.

### **ACR # 14**

#### **Background on joint ventures in the Kodiak setnet fishery**

The joint venture regulations on the books (5 AAC 18.331 (e)) went into effect in 1985. The regulation allows two permit holders to combine their allotted fathoms of gear into three nets. Both permit holders are legally responsible for fishing all the gear. The length of web allowed an independent permit holder and a joint venture participant was exactly the same. A joint venture did not mean a loss of fathoms, it simply meant a different configuration of web. A permit holder could fish 150 fathoms independently (choosing 1 long net or 2 shorter ones), or team up with another permit holder to fish 300 fathoms split among three nets in a joint venture. The total amount of web for two permit holders, whether fishing on their own or in a joint venture, was 300 fathoms.

The graphic below illustrates the scenario that was in effect from 1985 through the 2023 season. Note that the total amount of fathoms is the same in both situations.



\*Not to scale

**The Problem**

The regulation on length of gear per permit holder in the Central Section of the Northwest Kodiak District was changed at the January 2024 Kodiak Board of Fish meeting to 175 fathoms (5 AAC 18.331 Gillnet specifications and operations, subsection a). However, the joint venture regulation was not updated to follow along. So now, a permit holder can fish 175 fathoms without a joint venture, but only 150 fathoms if joining with another permit holder for a joint venture. Until this is fixed, a joint venture is capped at 300 fathoms, thereby depriving those participants of the opportunity to fish 50 fathoms that is available to all other independent permit holders. Currently, the total amount of fathoms is less for people fishing with a joint venture than without.

This inconsistency came about because this RC was taken up at the very tail end of the January 2024 Kodiak BOF meetings, after the period for public input had ended. There were no questions to the Department of Fish and Game about how the regulation would affect joint ventures; the only questions were regarding conservation concerns, of which none were noted. Fishermen assumed that the joint venture regulations were tied to the length of gear per permit as they had always been and would change automatically.

## **Effect of problem on fishermen**

According to the Department of Fish and Game, in the setnet fishery in the Central Section of the Northwest Kodiak District, the 10-year average of joint ventures from 2013-2023 was 10. In 2024, that number dropped to three. Those who had historically participated in joint ventures but chose not to in 2024 cited the loss of opportunity relative to non-joint venture permit holders as the driver of their decision making. They have 50 fathoms LESS available to them than other fishermen.

Until the inconsistency between the length of fathoms of a single permit vs a joint venture is resolved, the joint venture will not be an effective tool for setnet fishermen in our area. It will become useless.

This is concerning because the setnet fishery is struggling to remain viable and cannot afford to lose any tools that may help its participants.

Indeed, the reason the BOF voted unanimously to increase the fathoms of gear allowed per permit holder was due to the board's recognition of our setnet fishery's loss of harvest percentage over the years and struggle to remain viable. It was a tool deemed appropriate to help our gear type while not impacting other gear types.

## **Solution proposed in ACR # 14**

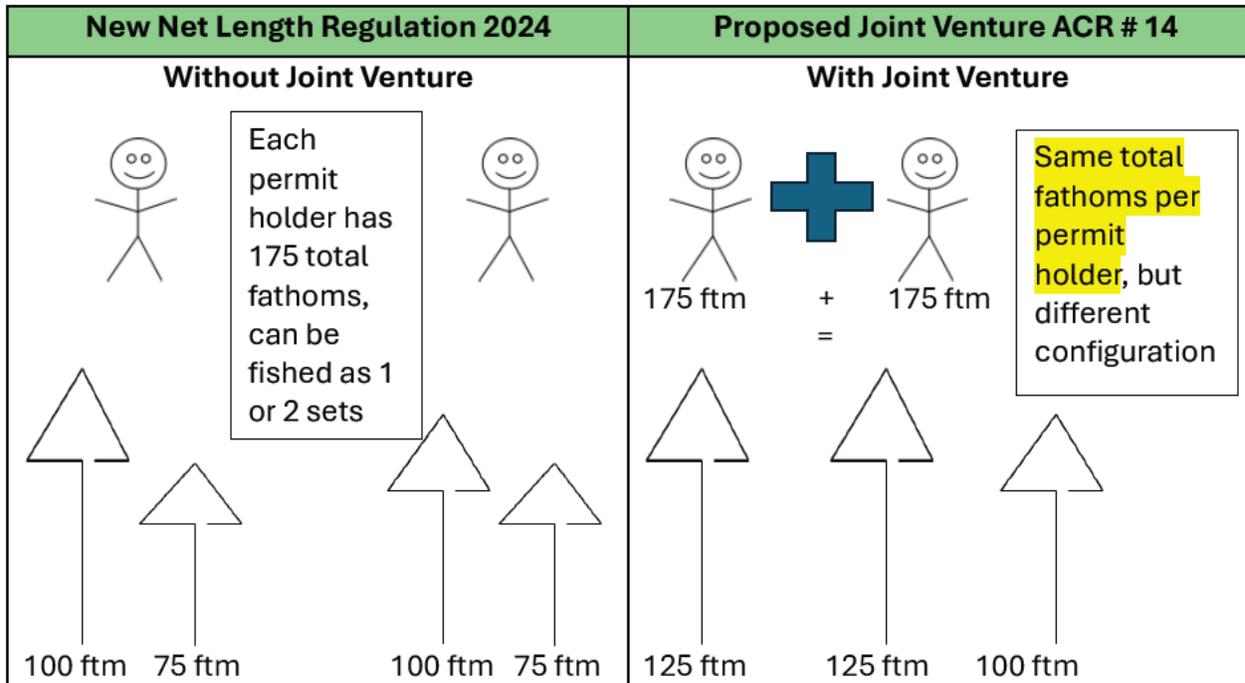
ACR # 14 seeks to update the joint venture regulations for the Central Section of the Northwest Kodiak District so that they match up with the new length of fathoms allowed per permit holder.

To be clear, ACR # 14 is not asking for additional web in the water. All permit holders are already allowed 175 fathoms. Whether they are fishing their permit independently or choose to joint venture for a 3-net configuration, they will have the same amount of fathoms: 175.

Currently, the number of joint ventures has dropped dramatically; instead, people are fishing their full 175 fathom allowance. This web is already in the water. Allowing joint ventures the same amount will not increase the length of what is already being fished.

There were no allocative or conservation concerns when the regulation for extra web was put into place. Updating the joint venture regulations will not change this because it is web that is already permitted to be fished.

The graphic below shows that, with the proposed update, we will be back to parity between joint ventures and non-joint ventures. As was the case from 1985-2023, the total amount of fathoms will be the same in both situations.



\*Not to scale

**Rationale: Why Now?**

This ACR is being submitted because, if we must wait until our next board cycle, fishermen will lose out on the ability to fish joint ventures without losing 50 fathoms of gear. The joint venture itself will become useless. An already struggling fishery will lose a tool.

According to AF&G staff comments in RC 2, it meets the criteria for an ACR because it was an overlooked, unforeseen consequence of the change in length of gear.

We respect the board’s time and understand that, if taken up, this will impact another region’s meeting time, but we believe that this can be addressed in a simple, straightforward manner that won’t require extensive, contentious comment or deliberation.

**ACR # 15**

**Background on set gillnet cooperative fishing practices**

Since before statehood, setnet sites have traditionally been made up of family units of multiple generations. Indeed, the allure of setnetting for many is that it is one of the few fisheries that a family with young children and elders can participate in.

70 % of setnet sites that fished in the Northwest Kodiak District in 2024 had two or more permits. Of those operations, 100% are family-based. Occasionally a crew member will hold a permit if one of the family members is unavailable for the season, but they are still considered part of the family operation.

Working together out of one or more skiffs, these fishermen work cooperatively to pick their nets. Normally they will use one skiff to pick fish from more than one permit's worth of gear, and to co-mingle those fish in the skiff, not keep each permit's fish separate from each other. These fish are then delivered to the tender on one permit. Comingling of fish is common practice, not just in Kodiak but in other areas of the state as well.

Because all the fish are accurately accounted for and reported in the correct stat area, this system has stood the test of time.

### **The Problem**

In 2024, we were alerted to a new interpretation of the law that makes this time-honored way of fishing impossible, threatening the ability of family fishing operations to survive. Now, each permit holder is required to keep his or her fish separate from all other fish and to deliver each fish on its own fish ticket, signed by each permit holder, at every delivery. This affects any operation with two or more permits, a situation that is, as a practical matter, impossible.

### **Effects on fishermen**

For many reasons, this requirement is not feasible in our generationally integrated, small skiff fishery.

Because this is a fixed-gear, shore-based fishery, our nets are separated by some distance (which can be many miles) from the tenders and holding skiffs. Logistically, this is a fishery unlike any other boat-based fishery, where it is physically possible to be in a different skiff or taking care of things on shore while a delivery is happening. It requires cooperation of all permit holders to get their harvest to the tender, and separating the fish out by permit is not practicable.

Also, some permit holders may be taking care of small children or they may be older. They are absolutely integral to the operation through their work cooking, cleaning, doing maintenance, gear repair, and attending to all the camp chores, yet requiring them to be in the skiff for every delivery, even when it is late at night or stormy, is impossible.

Critically, this does NOT mean that permit holders can be absent from the fishery. All permit holders are required to be either in the skiff or at the site when their gear is being fished, as delineated in 5 AAC 39.107. Operation of Gear, section d, which states that permit holders with stationary gear must be "physically present at a beach or riparian

fishing site during the operation of net gear or other stationary fishing gear at the site, except when the permit holder is at or traveling to or from the location of (1) a sale of fish caught in the gear; or (2) other stationary gear of the permit holder. “

Kodiak setnetters take this seriously and pull gear if someone has to leave the site for any reason. Enforcement officers can easily check whether all permit holders are present.

One of the problems with separating out all fish from each permit is that our skiffs are small – 18-24 feet typically – and we do not have the resources or crew numbers to dedicate only one skiff to a permit. Many two permit operations don’t even have more than one skiff available. Setnet sites utilize holding skiffs with ice or RSW as they wait up to 36 hours for a tender to come to them, and they do not have the holding capacity to separate out the fish from each permit.

We are also concerned about safety. Multiple-permit operations fishing in exposed waters often practice the buddy system, where two skiffs will work together on harvesting the fish from several nets. This means that if one skiff has a mechanical breakdown, becomes full of fish (or kelp or jellyfish), or encounters other issues, another vessel is right there to help. Requiring fish from each permit to be kept separate does not work with this style of fishing.

If this problem is not addressed, we do not know that setnetting families who have been fishing this way their whole lives, and for generations, will be able to adapt in a way that prevents them from being cited and fined and from going out of business. It makes us fear for a fishery that already struggles to survive.

### **Solution Proposed in ACR # 15**

ACR # 15 does not ask for anything out of the ordinary. Co-mingling of fish is part of how setnetters have always worked, and this ACR proposes to address any language regarding “Unit of Gear” or registration concerns for setnet fishermen fishing cooperatively so that they may continue to operate in the way they have for decades.

We support simple fixes that do not upend much of the setnet population around the state. Any of the four solutions proposed in ACR #15 address these points, and we are open to additional ideas as well. We are fully committed to working with agencies to develop regulations that work for everyone and that preserve a way of life that has been vital to the fabric of our communities since before statehood. To allow time and opportunity for these discussions to happen, we request that the Board move consideration of ACR # 15 to the March meeting.

Thank you for your consideration. For more information, please do not hesitate to contact Adelia Myrick, President of the Northwest Setnetters Association, at [REDACTED]

**Submitted By:** Janet Carroll  
**Organization:** OBI Seafoods  
**Community of Residence:** HOMER

**Comment:**

State of Alaska Board of Fisheries  
 C/O ADFG Board Support  
 P.O. Box 115526  
 Juneau, AK 99811

October 12,2024

To Alaska Board of Fish members:

The following comments address ACRs 5,6,7, and 8. As a major buyer of seafood resources in the Upper Cook Inlet area (and all of Alaska) for the past 50+ years. We at OBI Seafoods support the newly formed beach seine operations in Upper Cook Inlet and the use of leads in the dip net fishery as an alternative gear type when the set gillnet fishery is closed. The Upper Cook Inlet set gillnet fishery has been active since Statehood and has supported many families, businesses, and communities in South Central Alaska. With the set gillnet fishery closed under the late run King salmon management plan to facilitate escapement goal objectives, we feel that it is important to explore other reasonable gear options for these permit holders. Options that may allow commercial fishing for use as a management tool by ADFG to prevent over escapement in the Sockeye fisheries and to allow permit holders opportunity to prosecute an economically viable fishery.

In the recent past this fishery was a major source of product for our plant in Seward and an integral part of our marketing for both fresh and frozen sockeye. And in turn, our Seward plant is a major economic engine in Seward and the surrounding community. We employ several year-round people in Homer who are focused on Upper Cook Inlet fisheries and many more year-round people in Seward dedicated to producing Alaska Fisheries products. We fully support these ACR's as a workable option for this fishery, its people, and the markets it supports.

Thank you for the opportunity to comment.

Sincerely, Janet Carroll, OBI Seafoods, Upper Cook Inlet Fleet Manager

**Submitted By:** Erik OBrien  
**Community of Residence:** Larsen Bay

**Comment:**

ACR 15 (Set Gillnet Co-operative Fishing Practices)

I SUPPORT ACR 15 updating the definition of "Unit of Gear" to accurately reflect the realities of family fishing cooperatives with some people actively fishing, generally healthy middle-aged, and others supporting remote camps, often older, younger, or unhealthy.

My family has fished since 1977, balancing the realities of up-and-down seasons, with family members playing various roles throughout the years to keep our Kodiak salmon setnet family cooperative viable. Throughout all these years, the active participants have changed with the realities of life including, health, birth, death, obligations, uncertainty, and other aspects of life that would prohibit any single person from fishing for 50 years

- and yet our family has managed to fish nearly every opener throughout this period. Note that active fishing requires committing 100 days every year, with many 12+ hours per day spent on the water, physically working hard, only to return to manage a remote camp. No single person could commit to that reality; however, a family can adjust to fill gaps, flexing up for busy times, and pulling back when necessary.

My parents who started fishing in 1977 are now in their mid-70s. They each continue to spend their summers at fish camp, maintaining facilities and equipment, watching younger kids, cooking, gear maintenance, administrative duties, logistics, and most importantly - supporting me, an active member of the fishery.

My daughter was one of the youngest people to ever hold a commercial fishing license at the age of 5, where she endured a public arbitration by a state lawyer who determined she was a direct participant in the fishery, particularly noting "she makes cookies with her grandma to ensure the crew stays fed", "helps the new crew learn their knots to tie the skiff" and "makes sure the crew stay safe, by remembering their float coats." The state lawyer chuckled and acknowledged that, "young lady, your fishery certainly needs you." While the State's Arbitrator knew the importance of my daughter's contribution to the fishery, it was never implied that she was on the 6:00 am, nor 11:00 pm picks, managing high-pressure washers, navigating the waves, lifting thousands of pounds of fish into the skiff - but without a doubt, she was a contributor to our fishery. Most importantly, if my family were not spending their summers at our remote fish camp with me, I would probably not be able to participate as an active member of the fishery.

My wife works in the school district, with summers off, a deliberate decision by our family to balance the realities of life and fishing. While we met in Larsen Bay, she was never a fisherman, but she loved the fishing lifestyle and committed to supporting her, now our, family by primarily maintaining the family and camp. I certainly wouldn't be able to actively participate in the fishery without her contributions.

This letter outlines several personal and real people, and their contributions to the fishery while acknowledging their support for my active participation in the fishery. There are also the financial considerations of multiple permit holders, that do not take a primary share of the cooperative's catch value, which can be allocated to the workers that are actively fishing. By reducing payments to my parents, wife, and children I'm able to allocate revenue to payment to crew, often young men from the village.

From an administrative perspective, family cooperatives probably improve the department accounting of total fishing effort, per permit by pooling resources to represent an actual representation of the full season over a longer period of time, which would likely not be the case from a single permit operation, that would miss many fishing days, regardless of their desire to fish all the days over long periods (50 years). If the state needs accurate information, I and many other family fishing cooperatives could work to develop requirements/rules to ensure accurate data, that do not require exiting the fishing due to unintended consequences from rigid, inflexible rules that hurt Alaskans.

Many reasonable people can read this account of my family's participation in the fishery and acknowledge that while it is difficult to impossible for all members of a cooperative fishing family to actively spend full days and seasons on the water hauling in fish, without them our fishing family would have long since exited the fishery, and with so many operations struggling to exist in today's difficult fishery, there is a high likely these fishing permits would remain un-utilized.

I hope you will consider the challenges and realities facing family fishing cooperatives, and not create another barrier forcing more exits, and stranded resources.

**Submitted By:** Erik OBrien

**Community of Residence:** Larsen Bay

**Comment:**

ACR # 14 – Joint Ventures

I SUPPORT ACR14, utilizing the full value of an SO4K permit (175fa) for Joint Ventures (350fa).

In the Kodiak 2023 January BOF Meeting, it was determined there were systematic and structural deficiencies with the Kodiak setnet fishery (SO4K) that risked the unintended exit of many participants due to the challenging economics for continued participation in the fishery. To address these challenges the BOF increased the "hook" size to 50fa and added 25 fa for a total length 175fa. Unfortunately, there was an administrative oversight that did not also allocate that revision to Joint Ventures, which allows fishing families to combine two permits and reallocate the combined gear. The Joint Venture is commonly used among SO4K fishermen for practical reasons, such as fixed gear sites that fish better than others and longer lines that better catch sockeye, allowing fishing cooperatives to put more gear on fewer sites while increasing the length of the line, allowing improved targeting of sockeye.

During the 2023 Kodiak BOF meeting, the change allowing 175 fa per permit, overlooked an administrative mistake that did not apply that change to a Joint Venture. I hope you will fix this oversight and allow Joint Venture operations to fish the full complement of fishing gear as intended.

**Submitted By:** Celestine Omlid

**Community of Residence:** Kodiak, Alaska

**Comment:**

I am in support of ACR 115. We are a family operated business and have been commercial set netters on Kodiak since 1964, holding multiple permits since the very beginning of limited entry. The interpretation of the unit of gear for set netters causes my family and business significant hardship as well as creates safety hazards on the water for myself and my crew.

**Submitted By:** Ryan Omlid

**Community of Residence:** Bend Oregon

**Comment:**

I am in support of ACR 115. My family has been set netting on kodiak for 60 years. This interpretation of the unit of gear for set netters causes significant hardship for our family business, as well as posing safety risks for permit holders and crew members.

**Submitted By:** Kris Omlid

**Community of Residence:** Bend, Oregon

**Comment:**

I am in support ACR 115.

**Submitted By:** Richard Person

**Community of Residence:** Chugiak alaska

**Comment:**

I support acrs 4-8 concerning alternative gear types for the Kenai River stock of concern management plan. I see no reason ACR7 should not be moved forward as it falls within the "new information" criteria as much as the other four. If the BOF is serious about making dip nets a possibly viable harvest gear type, the use of leads should be discussed in the board process.

**Submitted By:** Matthew Person

**Community of Residence:** Eagle River

**Comment:**

I support ACR 7 as a lifelong 3rd generation East Side Setnetter, if the Board is truly working to give the Setnetting industry relief in some fashion in this Commercial Dipnet fishery, this ACR needs to be considered as "new informatin" as its potential has never been implemented or assessed in this new fishery. If the other 4 ACR's (concerning the Kenai River Late-Run Chinook Stock of Concern Management Plan) are considered "new information" and usable by the Department of Fish and Game, ACR 7 in my opinion certainly does as well. Furthermore, at the VERY LEAST, it should be allowed to be tested, as these other gear types have been. If the board truly has this historical industry's best hopes and future in mind in these challenging times, in order to provide opportunity for the furtherance of this legacy and the passing on of its cherished traditions, this commercial dipnetting opportunity has to remain open to the input of the men and women actually putting gear in the water, and ready to pivot based on the activity and testing of the fishermen who's livelihood it governs. ACR 7 gives fisherman a chance at trying something that keeps incidental harvest of Chinook stock at zero, and has at least a chance of being fiscally usable by the fisherman of this industry. It is clearly written, and provides an excellent explanation of what this ACR hopes to achieve and the clear, and desperately needed, value it brings to a beleaguered fishery, saddled with far more conservational burden then its peers. Please carefully read it and I hope you see the value it has for our fishery. Thank you.

**Submitted By:** Joseph Person

**Community of Residence:** Anchor Point

**Comment:**

Members of the board,

My name is Joseph Person and I am a lifelong, third generation Upper Cook Inlet Setnetter. I submitted ACRs 4 and 7. ACRs 4,5,6,7,8 all involve new experimental gear types, dipnets and beach seines, that were tried during the 2024 salmon season on the traditional Eastside beaches in place of setnets. This was completely new and experimental for both gear types.

At this point in the ACR process, the only real question at hand is whether a request meets the requirements to be accepted out of cycle by the Board and assigned to a meeting where it can receive proper public comment and be reviewed on its merits as a proposal with input from the department, participants, community members, etc and the details of the proposals worked and fleshed out with proper due process. I was encouraged to see agreement from the department in their staff comments that ACRs 4,5, and 6 all having to do with the new dipnet fishery met the requirements to be considered out of cycle. To quote staff comments on all three of those acrs:

c) Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted? Yes, the effectiveness and commercial viability of dip net gear in the Upper Subdistrict was unknown at the 2024 Upper Cook Inlet board meeting when the SOC management plan for Kenai River late-run king salmon was adopted.

However I am utterly baffled that somehow ACR 7 has a different response from the department. It seems clear that the exact same

"Yes, the effectiveness and commercial viability of dip net gear in the Upper Subdistrict was unknown at the 2024 Upper Cook Inlet board meeting when the SOC management plan for Kenai River late-run king salmon was adopted."

should clearly apply. Furthermore the reasoning given in ACR 7 that

"No. The board discussed leads at their last meeting and determined that they did not want to allow leads in this fishery. There is no new information available to alter this discussion. "

is fairly nonsensical. Every bit of information gathered this summer dipnetting has the potential to alter the discussion of leads. This would also apply to ACR 8 as beach seines were discussed in much more significant fashion than leads at the last meeting and yet the department supports re-addressing them out of cycle. The only difference being that beach seines were fished under experimental commissioner's permits this season.

However, my family requested a commissioner's permit to try to use a lead for dipnets in June 2024 and the department declined to grant us one on the grounds that "regulations for dipnets had been put in place by the Board of Fish and consequently it was outside the grounds of a commissioner's permit to try them". As a result, I now have returned to the board of fish process to attempt to make the new dipnet fishery have a chance at viability.

In any case the fact that,

"the effectiveness and commercial viability of dip net gear in the Upper Subdistrict was unknown at the 2024 Upper Cook Inlet board meeting when the SOC management plan for Kenai River late-run king salmon was adopted."

is precisely why with the new information as to efficiency and effectiveness gathered this season, methods to potentially augment the fishery should be looked at. There is absolutely new and relevant information and if the department has concerns about the merits of such a proposal they will have ample opportunity to express them during the process at a proper meeting. I put this proposal in after much thought while fishing with dipnets myself this summer, and conversations with many other fisherman. It is a very rough framework and I would like to see ACR 7 moved on to a proper meeting where public input and process can attempt to determine if the idea has merit and what details need ironed out.

Again if ACR's 4,5,6,8 meet the requirements for being an ACR then clearly ACR 7 does also. The merits of it as a proposal are not currently the question, and that question deserves the opportunity to be addressed at a proper meeting.

Thank you,

Joseph Person

Petersburg Vessel Owner's Association

[REDACTED]

Petersburg, AK 99833

Southeast Alaska Fishermen's Alliance

[REDACTED]

Juneau, AK 99801

October 15, 2024

Alaska Board of Fisheries

Art Nelson, Executive Director

PO Box 115526

Juneau, AK 99811-5526

Dear Art Nelson and Board of Fish Members,

Our Associations are writing about arrangements for the 2025 January/February SE-Yakutat Board of Fish Cycle meeting as you decide how you want to split the meeting in sections for consideration. We understand that the shellfish and groundfish proposals are being considered for at the end of the meeting. Including shellfish in combination with groundfish at the end of the meeting has us very concerned that commercial crab/shellfish fishermen will be unable to participate in that portion of the meeting with the [REDACTED] Golden Brown King Crab fishery starting February 10<sup>th</sup> and the Board of Fish meeting scheduled to end on February 9<sup>th</sup>.

The SE crab & shellfish proposals were removed from the Statewide meeting cycle because of this very issue that the meetings were occurring during the season. At the time the change was made the SE cycle was held as two meetings, one in January where shellfish and sometimes herring/sometimes groundfish were considered and a second meeting held in February for finfish.

In addition, this meeting has complicated the issue for groundfish fishermen as the Board of Fish meeting is overlapping the International Pacific Halibut Commission Meeting at the beginning of the meeting.

We would like to recommend consideration that the crab/shellfish proposals be heard at the beginning of the meeting and groundfish be heard at the end of the meeting to reduce the conflicts for the affected fishermen.

Sincerely,



Nels Evens, Executive Director PVOA



Kathy Hansen, Executive Director SEFA

**Submitted By:** Jane Petrich

**Community of Residence:** Kodiak and Larsen Bay

**Comment:**

ACR 14

I support the intent ACR 14

ACR 14 SHOULD READ: Allow CFEC salmon set gillnet permit holders who form a joint venture in the Central Section of the Northwest Kodiak District to operate the same amount of set gillnet gear per permit as allowed in subsection (a) of 5AAC 18.331

ACR 14 does not request an increase in fathoms of gear only that the fathoms of gear fished in a joint venture be brought into parity with the allowable fathoms of gear in sub section (a) of 5AAC 18.331,

CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.

5 AAC 18.331 Gillnet specifications and operations, sub section (e).

ACR 14

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM During the January 2024 BOF meetings in Kodiak the set net fishermen demonstrated how their historic fishery was in trouble and proposed a number of changes to their Kodiak salmon fishery that would help them stay viable in the fishery going forward. Resistance from the other user group was formidable. The mantra from the seiners was leave our fishery alone, instead provide some new ideas to improve within your (the set net) fishery. Two new regulations came out of the meeting that set net fishermen could implement to improve their catch: 1st a bump in the number of fathoms a single permit could fish from 150 fathoms to 175 fathoms and 2nd a change in the number of fathoms within the 175 fa per permit could be used in the hook portion of a set net from 25 fa up to 50 fa.

BUT the regulation increasing the number of fathoms in a set gillnet from 150 fathoms to 175 was only applied to subsection (a) of Section 5 AAC 18.331 - Gillnet specifications and operations, and was not applied in Subsection (e) Joint Venture. Sub section (e) Speaks to the operation of the set net, not the specification of the gillnet. The current (historic) joint venture regulation states:5 AAC 18.331 (e) (6) no single set gillnet may be more than 150 fathoms in length; and (7) a joint venture may operate no more than three set gillnets, with no more than 300 fathoms of gillnet gear in the aggregate. The Joint Venture allows for 2 permits to form a joint venture for the operation of their gillnets. It is a tool that allows the permit holders to join allowable fathoms fished and to configure their nets into sets that best fit their sites. The JV would provide more options for increasing the hook size up to the new 50 fathom cap and yet get far enough off shore to where the fish are traveling. But instead as written permit holders who

used a joint venture would lose 50 fa of net and any advantage a joint venture might offer. The Joint venture, adopted in 1985 is now a useless tool to me and my operation.

#### WHAT SOLUTION DO YOU PREFER?

To update the regulation. The language in 5 AAC 18.331, section e, # 6 and # 7 would be changed to reflect the new allowed amount of gear for setnetters in the Central Section of the Northwest Kodiak District. This would read:

(6) no single set gillnet may be more than 150 fathoms in length; except that in the Central Section of the Northwest Kodiak District, no single set gillnet may be more than 175 fathoms in length;

(7) a joint venture may operate no more than three set gillnets, with no more than 300 fathoms of gillnet gear in the aggregate; except that in the Central Section of the Northwest Kodiak District, the aggregate length may be no more than 350 fathoms.

**PC73**

**Submitted By:** Jane Petrich

**Community of Residence:** Kodiak Island, Larsen Bay and Kodiak

#### **Comment:**

ACR 15 Define 'unit of gear'

I support allowing Kodiak set net fishing operations fishing multiple permits to continue fishing as they have since limited entry was enacted including comingling fish and requiring the permit holder to be present at the site always but not required to be at the tender at the time of a delivery on his/her permit.

The recent interpretation regarding comingling fish and each permit holder stamping a ticket at each delivery creates significant hardship for my family and further threatens my family's cooperative fishing way of life. Set gillnet fishing has many unique characteristics that should be reflected in your understanding and refinement of fishing regulations.

I have held a permit and participated in the Kodiak Island set net fishery for 46 years. I am now 75 years old and fish 4 permits cooperatively with my son and his family. We fish 6 nets out of 2 skiffs. We have comingled our fish since we started fishing multiple permits and forming Joint Ventures in the early 1990's. The logistics and cost involved in separating our fish by a specific site/net matched to a specific permit would put us out of business in 2 years max. There are so many different ways separating our fish would be unsafe, inefficient, time consuming and expensive it is hard to know where to begin to try to explain. Expensive is pretty clear cut because it would require us to run back and forth to the nets, the ice supply and the tender triple what we do currently. Each skiff would have to carry a minimum of 4 small totes (2 permits/2

totes each for different species) instead of the 2 large totes we currently carry which would cut down on the working area in the skiff, add weight and cause safety concerns. Inefficient because we couldn't just pick until we were full and deliver but would have to stop once the 2 totes for 1 permit were full, travel to the tender, deliver, get more ice and then come back to the nets. The reasons go on and on – no two days on the water are ever the same!

My family relies on my work at the site, my permit, my investment in the fishery, and my knowledge of the fishery gained over 45 years of commercial set net fishing.

Expecting me to be present every time a tender delivery is made will create great hardship on me and my family– especially in adverse weather or late at night. I fully participate in our co-operative fishery by being the main net mender, cooking for crew and family, maintaining machinery, paperwork, training crew and generally keeping the wheels on the bus. I have much more important roles than merely signing a fish ticket.

This is an issue that illustrates unfamiliarity with standard set gillnet fishing practices and necessitates the Board's attention so as not to put me and hundreds of set gillnet permit holders at risk of going out of business or being cited for doing what they have done for generations.

## SOLUTION

The simplest solution would be to define “unit of gear” as follows: “For set gillnet fishermen fishing multiple limited entry permits co-operatively, “unit of gear” is defined as all set gillnet gear being fished by those permit holders working co-operatively and comingling their catch.”

**Submitted By:** Michael Purcell

**Community of Residence:** Anchorage

**Comment:**

I support ACR 9 and 10. My family have owned property on Dow island for 40+ years. It would be a shame for our children to not be able to fish from shore with bait like our family has done for decades.

**Submitted By:** Mathew Riendeau

**Community of Residence:** Chicago, Illinois

**Comment:**

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Spiridon Bay since since 2021.

I am writing in support of ACR # 14.

While I have never fished a joint venture, I know that many in our setnet community do and I would hope to someday as well. The recent changes to gill net length (Section 5 AAC 18.331 Gillnet Specifications and Operations, Subsection A) did not apply to joint ventures. As it currently stands, it does not make sense for me to expand our current setnet operations in a joint venture, as we would not be able to take advantage of the recent changes to the regulations. In light of the recent hardships faced by setnetters, joint ventures are a valuable option for many of our family run operations. Historically the joint ventures have matched the total length of gear allowed per permit and I would hope to see this oversight corrected so that joint ventures remain a viable tool for setnetters.

I see this issue as an easy fix. This is not adding more web to the water because all permit holders are already allowed the full 175 fathoms.

Thank you for your consideration.

Sincerely,

Mat Riendeau

**Submitted By:** Jackson Rivera  
**Community of Residence:** Pocatello

**Comment:**

ACR 8

SUPPORT

I have been a crew member of my extended family's setnet fishing operation for several years. The closures have been a huge hardship and unless there is a new regulation to make it so the set beach seine nets can fish I will never be able to come and work as a crew member again in my life time.

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**Submitted By:** Lila Rivera  
**Community of Residence:** Pocatello

**Comment:**

ACR 8

SUPPORT

My grandpa and my uncle have always fished in Alaska at Kenai and I am finally old enough to go work with them like I have always wanted to do, like my cousins and brother.

Please make set beach seine nets legal so I can be on a fishing crew. If not I will not ever be able to go and do that work. It is very important to me and my family.

I am asking for the Board's support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I agree with the department that ACR 8 meets Criteria C to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

**PC78**

**Submitted By:** Brian Scow

**Organization:** scowfishing LLC

**Community of Residence:** Kenai Alaska

**Comment:**

I support including City of Kenai beach leases in commercial Dip Netting

Also I support all ACRs to make commercial dipnetting permeant with more time than 36 hrs because due to weather conditions we can not dip net every day I did very well made 42,000 dollars with only 8 dip nets 2 permits also the board of fisheries needs to allow the use of at least 1 stack permit in dip netting my site only has 3 permits 2 in my name and I was could have done a lot better with one extra permit allowing 4 more dip nets I employed 8 high school kids for the season they were happy to have a summer part time job 2 permits in one name is not a lot to ask if I would have to change it to someone I trust and with the limited amount of fishing that would be difficult to get someone here for the short season also I support seine net on the beach thank you for your time [REDACTED] East side city of Kenai Setnetter

**PC79**

**Submitted By:** Nancy Scow

**Community of Residence:** Kenai Alaska

**Comment:**

Please consider Acr 8 for the use of Seine nets as a way to lower over escapement of 2.4 million sockeye Salmon into the Kenai River with 0 kings killed in a drone net test fishery last July 2024 also please fix the current commercial dip net fishery we need more time per week and

more days into August due to weather conditions that make it very difficult and Dangerous or even impossible to dip net on windy days! We also need the board of fisheries to allow two permits per name to be used it would add 4 more crew members to participate in commercial fisheries all are kids out of school for the summer it is the perfect part time jobs and supports the local community we did very well last summer on the eastside commercial dip netting fishery last summer in 2024 we released all but one silver salmon like regulations required if the coho salmon are in trouble then it all the more important to reduce the sockeye over escapement of the last 3 years past data shows what happens to the population of the other 3 Salmon species when you over escape sockeye salmon stop over escapement's before the river is Destroyed and then Nobody will be fishing for a long time Thank you [REDACTED]



October 15, 2024

Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811  
Submitted via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Comments on ACR 13

Dear Alaska Board of Fisheries Members:

Thank you for the opportunity to comment on the agenda change requests (ACR) under your consideration at the upcoming Alaska Board of Fisheries (BOF) Work Session October 29-30, 2024. **Silver Bay Seafoods opposes ACR 13.**

Silver Bay Seafoods is a fisherman-owned, Alaska seafood processing company. Our False Pass facility supports purse seine, drift gillnet and setnet fishermen who participate in the Alaska Peninsula fisheries. We are fully integrated in the region and are present in multiple AK Peninsula communities. In addition to the facility and fishermen services in False Pass, Silver Bay operates a public commercial fishing supply store in King Cove, we employ full-time support staff in Cold Bay for critical logistics, and we have additional fishermen services in Sand Point.

We recognize and share concern about the poor salmon returns seriously impacting subsistence users along the Yukon River. This is an important issue and we, like many Alaskans, have sought answers to the cause and explored possible remedies. State and federal researchers have described the situation as complex and primarily related to issues with near-shore marine survival, citing warming waters, food availability, increased marine mammal predation, and other factors. Research has not pointed to harvest in other fisheries as the “smoking gun” cause or even the remedy to addressing these poor salmon returns.

The fishing industry has welcomed additional examination of these fisheries. In fact, we had ADF&G biologists in our facilities the last two seasons and provided them with full access to collect genetic samples of the daily salmon harvest. We look forward to learning more from this research project in the coming years, but we think the preliminary information provides important insight.

In addition to supporting additional research, we took action to show our fellow Alaskans we are committed to real solutions even if we are not the cause of this problem. Silver Bay Seafoods worked closely with our fishing partners to support a fleet-wide voluntary chum avoidance program in the June South Peninsula fishery in 2022-2024. This cooperative effort was unprecedented and extremely effective; chum harvest results from the 2022-2024 South Peninsula June fisheries show clear evidence that these chum avoidance measures are working.

We agree with the assessment published by the Alaska Department of Fish and Game confirming through staff comments that ACR 13 does not meet the criteria as outlined in the policy for changing a board agenda defined in 5 AAC 39.999(a)(1).

Thank you for the opportunity to comment.

Respectfully,



Abby Fredrick  
Director of Communications & Investor Relations

**Submitted By:** Terri Springer

**Community of Residence:** Kodiak

**Comment:**

My husband and I are longtime (1970's) Kodiak SetNet permit holders.

We are writing in support of ACR #14 and ACR#15.

We have fished a joint venture for many years with utilizing this ability to have 3 nets in the water rather than 2. With the current addition of 50 fathoms we were forced back to only 2 nets to be able to take advantage of the extra 50 fathoms, thereby losing the advantage of that third set of gear.

It is important to fix this now through an ACR rather than wait until the next board cycle because until then anyone wanting to fish a joint venture in the central section of the NW Kodiak district will lose the opportunity to fish 50 fathoms that everyone else has.

This is not adding more web to the water because all permit holders are already allowed the full 175 fathoms.

For ACR#15..we have very strong feelings on this one! We fish a family operation. It is absolutely ridiculous and impossible to keep all fish per permit separate and to have both my husband and I go out to every delivery just to sign separate fish tickets.

1. There's not enough room in our holding skiff to have separate totes for all the species...that would double the required space needed.
2. It would be impossible to pick each net separately and take back to the holding skiff before going on to the next set. We travel over 6 miles one way to one set of gear. Overall it's a 12 mile loop to run our gear.

Not passing ACR#15 will create a huge hardship in time and a huge increase in expense! We go through approximately 15 barrels of gas a season...this expense would literally double if we had to separate our gear by permit holder.

We are not asking for anything special. We are just trying to maintain our way of life.

Thank you for your consideration.

Sincerely,

Tom Springer

Terri Springer

Briana Springer

**Submitted By:** Betty Stephenson  
**Community of Residence:** Kenai

**Comment:**

I am writing in regards to ACR #10. My name is Betty Stephenson. I moved to Alaska in 1951. On Sunday, I will be 96 years old. I have fished the targeted area of the Kenai River since the 1960's. The bait restriction has affected my mental well-being, which is protected by the Fish and Game Constitution. "To protect the well-being of the people of the State of Alaska." I personally feel that with these bait restrictions, I will not be able to fish for the rest of my life. It takes three people to load and unload me in the boat. I cannot stand in a boat. I cannot catch a fish that gets into the main stream of the river, which is highly likely fishing with a lure. Traditionally, I have fished with bait in an anchored boat, close to the bank, dropping my line right at the end of the boat. This year is the first year since I began fishing the river in the 60's that I have been unable to fish. This is a direct consequence of the bait restriction. Restricting bait is discriminatory toward me, and many other elders and disabled. In order for me to fish next fall for silvers, please pass ACR 10 and a proposal in March to lift bait restrictions.  
Sincerely, Betty Stephenson

**Submitted By:** Donna Anderson  
**Organization:** Sterling Sportfishing Support  
**Community of Residence:** Kenai, AK

**Comment:**

Board of Fisheries,

This letter is in support of ACR 9 and 10.

ACR 9 addresses the issue of a predator, rainbow trout, decimating the salmon species in the Kenai River. Rainbow trout feed year-round on salmon fry. At some point, a conversation about the impact rainbow trout have on the decline of all salmon species needs to be addressed. Now is the time. Harvesting rainbow trout will have the largest and fastest impact on the conservation of all salmon species in the Kenai River.

ACR 10 addresses the discriminatory effects of eliminating bait fishing. Bait fishermen, typically the elderly, disabled, disabled veterans, and children, are not decimating the salmon species. (SEE ACR 9!) In March, the BOF was presented with false claims of “traditional fishing.” The lack of public knowledge about Proposal 167, before it became regulation, is also concerning.

Thank you for your time and efforts in correcting this discriminatory regulation.

Sincerely,

Sue Stephenson

Donna M. Anderson

Sterling Sportfishing Support

**Submitted By:** Susan Stephenson  
**Organization:** Sterling Sportfishing Support  
**Community of Residence:** Kenai

**Comment:**

Dear Board of Fisheries members,

Regarding ACR 9 ! I wrote a comment to ACR 10 that aligns with ACR 9 as well. ACR 9 protects all salmon species. Rainbow trout is a known predator fish. Rainbows have become the dominant fish in the Kenai river. This issue needs to be addressed.

Thank you,

Susan Stephenson

Dear Board of Fisheries Members,

This letter is in regards to ACR #10. My name is Susan Stephenson with Triple "S," Sterling Sportfishing Support. I have fished the Kenai for the last 43 years. I presently reside in Kenai. I have previously resided in Sterling. Our parents have fished in this area since the 1960's. We currently have eyes on the Kenai River year round.

I personally have read hours of research and three studies all provided by Fish and Game. I have watched youtube videos, read magazines, newspaper articles and listened to and read personal testimonies. Regarding the Kenai fishery, I have not found any proof or information that bait restrictions are working. Bait restrictions on any species has no warrant or proof it works to protect the Kenai River salmon species.

The Unalakleet River study that was submitted in support of Proposal 167 cannot be easily graphed to the Kenai River. The two rivers vary on many facets. Currents and depths of these rivers are different. The Unalakleet River is a much smaller river. Average temperatures of these rivers vary. The Unalakleet's average temperature is 45 degrees to 60 degrees. The Kenai River averages a temperature of 38 degrees to 45 degrees. However the Unalakleet can run much colder than the Kenai River in the winter time.

We have had three major wildfires on the Kenai Peninsula in the past eight years. Funny River fire, Card Road fire and the Swan Lake fire. The bulk of the debris, ash and the burned trees flowed into the Kenai River, which gives the Kenai a separate ecosystem than the Unalakleet. The Kenai River has since moved over about 25 to 30 feet, changing the course of the river in the targeted area.

The Kenai River is overrun by Rainbow trout, a predator species. Rainbows survive during winter months on salmon fry. Salmon fry can remain on the Kenai River for up to three years. Hiding along banks and tributaries; however, Rainbow hunt for food year round. When rainbows find a good area, they stay in that area until food is scarce and then move to a new feeding ground.

Fishing with bait is not an aggressive way to fish; however, fishing with a striker, bobber and bait combination could be considered aggressive. We ask for the BOF to consider a tackle restriction. Eliminate the striker and bobber combination. This combination makes the angler not to actually feel the fish biting; therefore, the salmon have time to swallow the hook. It's a skill that is lost with the striker bobber combination.

Traditionally, the way to fish on the Kenai River is from an anchored boat with a weight on a slider, a leader in about 18" length, with cured salmon roe, right behind the boat. This gives the fish the advantage, not the angler. Some anglers fish with Qwikfish or Maglip with sardines or herring tied on. It is very rare for a fish to be able to swallow these lures, once again giving the advantage to the fish not the angler.

I have a lot more information in my head, so much! I will be attending the work secession at the end of October. I am looking forward to meeting each and every one of you.

Thank you,

Susan Stephenson

Alaska Board of Fisheries  
October 15, 2024  
Re: ACR 2 and ACR 3

To members of the Alaska Board of Fisheries

I write on behalf of the Susitna River Coalition, a watershed organization based in the Susitna Valley. The Susitna River Coalition (SRC) comments on behalf of our more than 14,000 individuals, groups, and businesses who support our work. We support the communities and ecosystems that are sustained by the resources of the Susitna River Watershed from the headwaters to the mouth. Salmon are keystone species within the Susitna Watershed. Not only do they impact the success and sustainability of other species in the region, they connect people to the land and region in which we live.

The Susitna River Coalition supports two agenda changes proposed for the Board of Fisheries Work Session on October 29-30th. We are in support of ACR 2, a proposal to designate Susitna River Chinook Salmon as a Stock of Yield Concern and to adopt a regulatory action plan (5 AAC 61.XXX). The Susitna River Coalition is also in Support of ACR 3, which seeks to designate the Little Susitna River coho salmon as a Stock of Yield Concern and implement a regulatory action plan under 5 AAC 61.XXX.

**In regards to ACR 2:**

The proposal to designate Susitna River Chinook Salmon as a Stock of Yield Concern and to adopt a regulatory action plan (5 AAC 61.XXX) is a critical next step for management. The yield of Chinook salmon from the Susitna River drainage has experienced a dramatic decline of over 99% in the past two decades. Many children and teenagers in our community have never caught or seen a King salmon. This opportunity to fight and see a magnificent king salmon is an experience that connects our youth and our stakeholders to the importance of all salmon in our watershed. We believe early action in the Susitna Watershed is necessary so the Susitna Kings do not follow a similar trajectory of the Kenai Kings.

Once one of the most robust Chinook salmon runs in the state, averaging 25,448 fish harvested annually between 2000 and 2004, the Susitna River now supports a mere 171 fish harvested annually from 2018 to 2023. This steep drop is not only alarming but clearly fits the criteria of a Stock of Yield Concern under the 5 AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries (SSFP). The Susitna River Coalition believes that immediate action is needed to ensure the sustainability of this vital fishery resource.

By designating Susitna River Chinook salmon as a Stock of Yield Concern, the Board will enable the development of a much-needed action plan to rebuild the stock's yield. Developed through a public process, this plan can address not only the ongoing sustainability issues but also critical factors such as declining age, size, and fecundity in the spawning population. Without this designation and a regulatory action plan, the Susitna River Chinook salmon stock risks further depletion, possibly triggering federal oversight under the Endangered Species Act.

The Susitna River Coalition urges the Board to prioritize this issue to avoid more severe future restrictions and to safeguard the state's management authority over the Susitna's salmon resources.

**In regards to ACR 3:**

The designation of the Little Susitna River coho salmon as a Stock of Yield Concern and implement a regulatory action plan under 5 AAC 61.XXX, is a crucial step to address the significant decline in coho salmon yields within the river.

This past season was a wake up call for those of us in the Susitna Drainage when sportfishing was closed for Coho. Anecdotally, individuals in drainage often rely on silver salmon in the drainage for their freezer every year. We have also heard from our commercial fisherman in our community that their typically successful Coho harvests were nonexistent.

Over the past two decades, the sport harvest of coho salmon has dropped by more than 85%, as evidenced by the alarming decline in harvest estimates from an annual average of 17,137 coho salmon during the 2000-2004 period to just 2,499 in recent years. This steep decline, coupled with frequent in-season emergency fishing closures, highlights the urgent need for regulatory intervention to rebuild the stock. By designating the Little Susitna River coho salmon as a Stock of Yield Concern, the Board of Fisheries will be following the guidelines of the Sustainable Salmon Fisheries Policy (SSFP), which calls for action when stocks show unsustainable patterns. The proposed regulatory action plan will help safeguard the sustainability of this vital fishery, ensuring that future generations can continue to benefit from its economic, social, and recreational value. Immediate action is necessary to prevent the coho stock from further decline.

Salmon fisheries in the Susitna Drainage face a growing number of pressures. The reduction in Chinook numbers is the quintessential indicator for struggling salmon stocks, with Coho the next to follow. In the Mat-Su Borough It is a crucial first step for salmon stock rehabilitation to acknowledge and reduce, quantify, and reduce the threats posed to these critical populations in a timely manner and necessary to consider these designations outside of the normal time allocated for the Susitna Basin.

Thank you for your consideration and for your hard work safeguarding fisheries in the state for future generations.

Margaret Stern *Margaret Stern*

Program and Communications Director

Susitna River Coalition

**Submitted By:** Sandra Swank

**Community of Residence:** Sterling

**Comment:**

Support of Agenda Change request regarding 5 AAC.57.121

I have been in Alaska since 1968 and my family owned a lot at the Kenai Keyes. We went fishing pretty much every weekend during the spring, summer and fall fishing seasons. When we caught female salmon, we kept the eggs to cure and use for bait when fishing for rainbow trout and silver salmon. This has been a traditional way to fish in the Kenai River outside the Kenai Keyes for all my years growing up and as an adult fishing in the Kenai River outside the Kenai Keyes. We used a single hook lure and cured salmon eggs for bait. Catching silver salmon has always been a joy for me as they are fighters and are the best salmon for eating (in my opinion). Catch and release is facilitated by using the single hook method. Going to a method of fishing that does not allow bait fishing hinders the personal/non-commercial fishing experience and this regulation should be changed back to the traditional way of fishing.

I am in support of the agenda change request and changing AAC 57.121 back to the original/traditional way of fishing for silver salmon.

**Submitted By:** Eddie Thomas

**Community of Residence:** Eagle River

**Comment:**

ACR 10 SUPPORT

Greetings Board Members, I thank you and commend you for your services in your overwhelming tasks.

I support ACR 10 to amend AAC 57.121 as well as ACR 9. My support is a result of the public disapproval of Proposal 167 approved earlier this year. Many locals from the Kenai Keys, Dot's Fish Camp (which many consider the hub of the Middle Kenai River with it's boat launch), Soldotna, Sterling, Kenai and the Peninsula and beyond have expressed disapproval as they were unaware of any opportunity for public comment. I just happened to see a random Facebook post which alerted to 167.

I am a 64-year-old disabled veteran from Eagle River and have a cabin at Dot's. I have fished the Middle Kenai for 25 years and many friends affected have resided and fished there even longer - some since the 1960s. We know the river extremely well and have seen the changes in what is basically our front yard. Many of us are elderly, handicapped or disabled and now must anchor to fish. I cannot fish Reds or Silvers nor help to net fish due to slippery rocks uneven terrain because of spinal issues. During discussions to vote on 167, one member of the Board said that we should find new ways to fish rather than our traditional method of curing eggs from Sockeyes for bait. This tradition has been passed on for a couple of generations. Believe us when we say we know of other methods to catch fish.

The crafters of 167 (Cooper Landing AC) proclaimed without supporting data or evidence that there has been an "exponential" increase in the number of bait fishers. Cooper Landing AC is comprised by a majority of guides. We observe the numbers of boats while watching Hole 3 out in front of Dot's Fish Camp boat launch (Hole 3) for hours upon hours every day and throughout the entire season. We are aware of what people are using (bait, jigs, Kwikfish, Vibrax, etc.) and how good or bad the fishing is and know when the Salmon have become blushed. We can easily observe how many boats are anchored in the middle river during Coho season. My personal experiences and observations tell me it has declined in recent years. Opening bait fishing between August 15 and October 31 will not have a significant impact whatsoever as most boats are pulled from the river around Labor Day weekend. Rain and colder temperatures, low water levels, glacier dam release floods, Covid restrictions, forest fires, economic hardships, and the massive run of Pinks in even-numbered years keep and have kept people off the water. The Pinks can be so thick it makes me feel I can walk over them at times, and it makes bait fishing for Coho basically impossible at times until they move upriver. I've read that the estimates for Pink run can be from 1-2 million. The Board suggested moving downriver to fish 100 yards below Bing's Landing. The Naptowne Rapids are down there and the bank is not very accommodating for the handicapped. Also, I have heard the parking area at Bing's is not safe to leave vehicles unattended. We have communicated with Kenai Fish and Game biologists and tried to confirm/corroborate the studies used (which we not cited in 167) and for any biological data that substantiates the the statements in 167. We cannot find justification to restrict the use of bait whatsoever. In fact, we were told that they were in year 2 of a 3-year study on Coho on the Kenai. Prop. 167 itself states in its final sentences that it is "not viable" as it excludes certain user groups such as the elderly and disabled. We question whether that exclusion violates the intent of the Americans with Disabilities Act (ADA). Perhaps that question should be asked to the AK Dept. of Fish Game ADA Office, AK Disability Law Center, or AK American Civil Liberties Union for clarification. Also there is no evidence nor data presented that Coho are being high graded or sifted through. One Board member mentioned he had concerns about the lack of biological data during the discussions on 167. ADFG wrote in their comments to the

Board that 167 would "add further restrictions to methods and means without biological justification." 167 seriously needs to be re-addressed and to overturn it seems as if the process cannot be done quickly and would take years to correct. I hope that the BOF would consider that when Proposals are submitted any and all pertinent data and studies used be cited/referenced and be submitted along with them. That information should be readily available if questions arise.

The below article appeared in the Peninsula Clarion newspaper and was also used in the Homer News. It helps explain the perspective of just a handful of the long-time local residents.

<https://www.peninsulaclarion.com/news/sterling-fishers-seek-reversal-of-new-kenai-river-bait-restrictions/>

It appears to me and many others, the Middle Kenai is being set up, or has been set up, as a "trophy fishery" for Rainbow trout. One can't keep one over 16 inches for subsistence... much less for a decent dinner for that matter. They have become the dominant predator given their size and bag limit protections. Perhaps that is why attempts have been made to keep anchored boats "moving on" as was requested in Prop. 171 of this year which failed a vote. Keep "moving on" from whom? Is it a way to get anchored boats out of the way of guides and drift boats? Is that why they wanted to make it a "fly-fishing only" fishery only as suggested in 167? If 167 was more readily available to the public for comment, I know it would have caused an uproar if "fly fishing only" was a new requirement. How many more "inexperienced" fishers would have to learn a new way to catch fish? It appears to me that Rainbows are being "sifted" through more than Coho are in search of trophy photos and certificates for size awards. If there was a way to limit the amount of Trout a fisher could catch and release per day that would that would be beneficial to the Trout to reduce their mortality and hook injury rates.

I saw no mortality rates cited for Coho in 167. The following article from John Schandelmeier in the Anchorage Daily News dated May 24, 2016 says that Rainbow catch and release results in a 5% mortality rate.

<https://www.adn.adventure/2016/05/24catch-and-release-fishing-cruel-and-unusual-punishment/>

A 2009 Stock Assessment of Rainbow Trout in the Upper Kenai, AK. states under "Hooking Injuries", "In 2009, a total of 1,475 trout at least 20mm FL were examined for previous hooking injuries. Hooking injury was detected in 1,014 fish. (74%, Table 12). The proportion rate of Rainbow Trout observed with a hook injury increased with fish size."

██████████ says in the following ad that some clients can catch up to 200 fish per day if the conditions all line up favorably. If someone catches 200 fish a day, 10 could die? 148 would have some type of hook injury? It does not seem to me to be very sportsmanlike if one believes those studies, and almost borders on wanton waste depending on who's definition you use. Ironically, Prop. 167 addresses "angling pressure". Is this not extreme angling pressure? [www.alaskatroutguides.com](http://www.alaskatroutguides.com)

The protection of this trout fishery may have caused an unforeseen problem when regulations for size and bag limits were written. I suggest a study or working group be formed on Rainbows and allow for some harvesting for subsistence as proposed in ACR 9. ADFG could use data to calculate the numbers that could be conservatively harvested and determine a time period that would be best. This could spur some economic activity on the Kenai for guides and businesses. Wouldn't it be nice for a tourist, client, or even an Alaskan resident to be allowed to bring home at least one nice Rainbow for dinner?

The following article, "Why are Kenai River So Big", by Jeremy Anderson brought the awareness of the Rainbow problem to light for me and its effect on Coho and King Salmon.

<http://www.fishalaskamagazine.com/kenai-river-rainbow-trout>

Everyone wants to point at trawlers, bait fishers, and pinnipeds (seals) as the culprits for the decline of Coho and Kings, but no one wants to look at catch-and-release of unabated monster-sized Rainbows as a root cause of the decline in numbers. The Reds

and Pinks escapement numbers to be fine, but Kings and Coho are not. Could it have something to do with where they are spawning? I know, and have read, Kings around the the Killey River and nearby tributaries below Skilak Lake. Prop. 167 suggests, "A significant component of the Coho staging in this area are in the later stages of the life cycles and have begun to deteriorate in food quality, thus requiring the discerning angler to high-grade, or sift through caught fish in order to harvest edible Coho Salmon. The resulting mortality rate on bait caught and released Coho Salmon needs to be addressed." This statement essentially admits the mortality rate is unknown. It also implies Coho are/have spawned. And is feeding on those fresh spawned eggs primarily? Trout. I'd rather see a fish hit cured eggs than take fresh spawned eggs from Kings or Coho. That is my hypothesis anyway.

Just another thought along the lines of hook and injury and mortality rates... Why aren't foul-hooked Sockeyes allowed to be kept? How many die or are hook injured? Anyone care about the mortality rate? But, it's okay to snag them from the ocean? Okay... it may sound more sportsmanlike to have to put the hook inside its mouth. Allowing people to take these foul-hooked reds would ease "angling pressure", reduce hook injured fish and mortality rates, and relieve river and parking lot congestion by getting people off the river quicker. I believe it would also ease tensions amongst fishers when "combat fishing" especially at the Russian River.

Again, in our opinion, after very extensive and exhausting months of research and communications with biologists and other ADFG officials, we have found no justification to restrict bait for Coho and there is not any verifiable "exponential" increase in the numbers of bait fishers. Approving ACRs 9 and 10 will allow the harvesting of some Rainbows for subsistence and could help protect other Salmon species. Opening the Middle River for bait from August 15 - 31 October will again let disabled and elderly people fish while maintaining a sustainable yield. If it were open only to elderly/disabled persons that could be verified by ADFG wardens by producing the appropriate fishing license. It could also boost the economy on the Peninsula.

I am not a biologist nor a lawyer, but the Alaska State Constitution, Article 8 reads:

3. Common Use: Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.
4. Sustained Yield: Fish, forests, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial users.

Agenda Change Request 9

I absolutely support Sterling Sportfishers Support’s request to increase the bag, possession, and size limits from rainbow trout in the Kenai River. Perhaps Fish and Game officials and /or biologists could recommend a reasonable annual limit, as a conservative measure, by use of harvest cards or permits such as are used for dipnetting. I suggest this proposal be considered as the Kenai River late-run King Salmon were designated a Stock of Concern and a Stock of Concern Management Plan was created to help the stock recover as rainbow trout have become the dominant predators of the Kenai River.

5 AAC 57.120 limits rainbow/steelhead in flowing waters of the Kenai drainage to 1 per day, 1 in possession, and must be less than 16 inches long. I do not know of anyone who wants to have one 16-inch trout for dinner and would not waste the time or effort to clean it. It seems that trout are the “stock of concern” here. My question is: Why are the rainbows so well protected and for whom? The guide service industry is our only plausible answer.

The following link below is to an article written in 2019 by Jeremy Anderson of Fish Alaska Magazine brings this realization to light for me that rainbows are the significant threat to salmon, especially the kings and coho. The photo of the person with a handful of king eggs made me see exactly how huge the problem with these predators is. The problem has become obvious and undeniable to me and many, many others who have fished the Middle Kenai for many decades. I recently read an article that said a trawler had a king salmon bycatch of 2,000 kings. A school of trout could wipe out that many eggs in nothing flat. Same goes for salmon fry and smolts. Over the past 5 years, this problem has accelerated.

<https://www.fishalaskamagazine.com/kenai-river-rainbowtrout>

The following link below	From	Subject	Received	Size
	USAA	Eddie, the 5 benefits of an income annuity you need to know now.	12:26 PM	74 KB

is and ad for Alaska Trout Guides (owned and operated by Josh Hayes) out of Cooper Landing. It states the “waters of the Kenai produce more fly caught Rainbow **Trout over 30 inches** than ANY other river in the world.” It also says, “Many of the larger Kenai River Rainbows crush the scales at *over twenty pounds*”. The article also proclaims, “In addition to the truly legendary Rainbow Trout the Kenai River host four of five Pacific Salmon species as well as an overwhelming healthy population of Dolly Varden – which at the right time of year can produce **daily fish numbers of up to 200 fish per person.**” Finally, the ad states, “If you are searching for a river with the largest Rainbow Trout as well as unfathomable numbers of feeding fish, the Kenai River is your fly fishing Mecca.” A simple search on the internet will show a tremendous amount of photos with guides and clients holding up their “trophies” out of the water for photo opportunities. And... what are these unfathomable numbers of feeding fish feeding on?

<https://alaskatroutguides.com>

If studies on the Kenai River do show the large rainbows have become the predators and eliminate all species of salmon eggs and fry, I agree this is the solution. This proposal would also benefit the guide services and local economies. Those of us who fish for subsistence would benefit as well.

**Submitted By:** Daniel Wichers

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

My name is Daniel Wichers I am an ESSN fisherman and permit holder and I am asking for your support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan.

I have fished with my family on our beach sites since 1986 missing only 6 years when I was in the military. Fishing is not just a job, it is a way of life. Last summer we had the opportunity to participate in the beach seine fishery and I feel strongly that we can fish a beach seine on our site at a reasonable expense by using much of our existing equipment. I feel like the beach seine is the best hope for the ESSN fishery, which has been around for over 150 years, during these low king salmon years.

I agree with the Department that ACR 8 qualifies under criteria (c) to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, harvested enough sockeye salmon to make it economically viable, worked on tested beaches and fishermen will be able to use their existing infrastructure to prosecute the fishery without substantial expense.

Thank you for your consideration of moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season.

**Submitted By:** JoAnn and David Wichers

**Community of Residence:** Kenai

**Comment:**

Support for ACR 8

From: Dave & JoAnn Wichers

We are writing to you to ask for your support to provide due process by moving ACR 8 to a future meeting agenda, prior to the 2025 UCI Eastside Setnet fishery season, to consider adding set beach seine nets as an alternative gear type in the ESSN fishery while in the Kenai River Late-run King Salmon Stock of Concern Management Plan. We also agree with the Department that ACR 8 qualifies under criteria (c) to correct an effect on a fishery that was unforeseen when a regulation was adopted because when the Board of Fisheries enacted the Stock of Concern management plan for king salmon in Upper Cook Inlet at its 2024 UCI meeting, commercial dipnets were added as an alternative gear type in the new regulation, but the board did not have the set beach seine net testing data at the 2024 meeting and therefore did not discuss it. The new information is that the set beach seine nets were tested by Commissioner's permit numbers UCI-2024-01 and UCI-2024-03 and allowed for the successful release of all king salmon alive and in excellent condition, and harvested enough sockeye salmon to make it economically viable.

Last summer we had the opportunity to participate a few periods in the beach seine fishery and feel confident that we could adapt our beach site for this fishery: by utilizing much of our current equipment and adjusting a beach seine to fit our location and crew size. After seeing the beach seine, we felt excited and hopeful about the possibility of fishing on our beach site again. It felt like the renewed dream of a fishery we have been losing for over these many years, as the king salmon have been coming back in low numbers. Harvesting only sockeye salmon and releasing all king salmon caught alive. We never observed any king salmon caught during the periods we were there.

We have been ESSN's and permit holders for over 40 years and have seen our fishery change so much over that time. But the last two years have been devastating with zero setnet openings and the future does not look good. Our children grew up on our beach sites and now we have grandchildren that we would love to see have the opportunity of commercial salmon fishing with their family on the beach.

Thank you for your time and your consideration.

**Submitted By:** Anitra Winkler

**Community of Residence:** Kodiak

**Comment:**

Board of fish members,

I am a lifelong Alaskan and Kodiak setnet permit holder. I have been set netting in Uganik since 2010 and a site owner since 2017. I am writing to voice my support for ACR 14 and 15.

First of all ACR 14 is pretty simple housekeeping to clean up something that was overlooked at the Kodiak meeting this past January. At that January meeting it was decided that setnetters would get an extra 25 fathoms of gillnet per permit. It is important to note that in Kodiak a permit can be fished as 1 or 2 sets but the aggregate can't exceed 175f. Joint ventures have been allowed for quite some time and the way that they work is that two permit holders can essentially pool their gear and fish together. The advantage of this is net length configurations that wouldn't be possible otherwise can be done, the easiest example being that a joint venture could fish 3 equal length nets. The issue here is that as the joint venture is a different line in the regulations when the extra 25 fathoms were added to a permit they did not get added to a joint venture so a joint venture now is still 300f instead of the 350f that it should be with the January decision to add 25f per permit. To make it extremely clear – If party A has a permit and party B has a permit they each are allowed 175f of gillnet. However, if they decide to joint venture they are only allowed 150f of net per permit because no one thought of this problem at the Jan meeting. I don't personally joint venture, but typically joint ventures are done by families with 2 or more permits and this a hindrance for them that I think no one intended.

ACR 15 is a little stranger because it is a new interpretation of the rules by law enforcement not a change from a BoF decision. I don't have a second permit, but I crewed for 6 years with 2 permits and one season of operating with a crewmember with a second permit. In both situations fish were pooled together. It would be extremely difficult as well as hazardous to keep fish caught on different permits separate for delivery. Our skiffs are not that big often 2 skiffs might pick nets together, generally starting at the furthest nets and working closer to the holding skiff. This is good for safety as well as efficiency as one skiff might be running the lead while another is doing only hooks. Furthermore, holding skiff space and ice are often issues having to separate the fish out would take up more space as well as ice to chill fish. I think it would be almost impossible to keep fish separate, but if not impossible a huge hindrance.

I hope that you will support ACR 14 and 15. ACR 14 is just clean up from the January meeting and 15 is to try to maintain our status quo.

Thank you for your consideration,

Anitra Winkler

**Submitted By:** Thomas Wischer  
**Community of Residence:** Kodiak

**Comment:**

ACR #14 and ACR #15

I support both of these ACR's. ACR #14 was just an oversight at the last BOF Kodiak meeting. It needs to be addressed due to the 25 additional fathoms allotted to set netters at the Kodiak meeting, otherwise those permit holders wanting to do a joint venture and fish three nets would sacrifice 50 fathoms of gear to participate.

ACR # 15 seeks to preserve and clarify what fishing families with multiple permits have always done, which is fish cooperatively, co-mingle the harvest and deliver under one of the family members permits. Having to separate each family members catch, hold and deliver separately, with each permit holder having to sign a fish ticket would be an insurmountable burden which cannot be sustained by fishing families. It would require additional and separate holding capacity dedicated to a single family member and that permit holder would have to physically deliver each day. This would be a financial hardship and a safety concern for the family fishing operation. It is totally unnecessary because the revenue generated from the entire cooperative fishery is distributed by agreement of the participating family members. If there is any need to identify an individual permit harvest, it would be a simple matter to just take the entire harvest by the cooperative fishing operation and divide by the number of participating permit holders in the family.

# Yukon River Drainage



## Fisheries Association

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Alaska Board of Fisheries  
2024/2025 Agenda Change Requests  
October 29-30, 2024

### **Yukon River Drainage Fisheries Association (YR DFA) Comments**

The Yukon River Drainage Fisheries Association (YR DFA) works for the people and fish of the Yukon River, which is home to more than 50 sovereign Tribal Nations spanning nine distinct Native cultures. These Nations and cultures have a relationship to salmon that spans centuries, not just generations. For over 10,000 years, Alaska Native people have relied on salmon for nourishment, food security, transportation reliability via healthy sled dogs, education, and cultural ceremonies. Salmon are not simply a resource—they are foundational to the existence and identity of our communities.

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**ACR 1:** Remove restrictions on gillnet mesh-size and length in the subsistence fishery for non-salmon fish in non-flowing water of the Yukon Area (5 AAC 01.220)

Suggestion: TNA

Analysis

1. **Is there a fishery conservation purpose or reason?** N/A
2. **Does the agenda change request correct an error in regulation?** N/A
3. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 2:** Designate Susitna River king salmon a Stock of Yield Concern and adopt a regulatory action plan (5 AAC 61.XXX)

Suggestion: **Accept**, meets criteria

Analysis

4. **Is there a fishery conservation purpose or reason?** Yes
5. **Does the agenda change request correct an error in regulation?** No
6. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No

Additional Comments

This is a critical conservation issue. Chinook salmon are struggling statewide, and we must implement effective management strategies to ensure their return to spawning grounds. While state staff did not bring this forward as a proposal, the Board of Fisheries should adopt it now. As noted, there is no drainage-wide escapement goal for Chinook in the Susitna River, which is a serious management gap. Amending this ACR to establish such a goal would further strengthen it and support a more comprehensive management plan.

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**ACR 3:** Designate Little Susitna River coho salmon a Stock of Yield Concern and adopt a regulatory action plan (5 AAC 61.XXX)

Suggestion: TNA

Analysis

7. **Is there a fishery conservation purpose or reason?** N/A
8. **Does the agenda change request correct an error in regulation?** N/A
9. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 4:** Increase the season dates and weekly fishing periods for dip net gear under the *Kenai River late-run salmon stock of concern management plan* (5 AAC 21.382)

Suggestion: TNA

Analysis

10. **Is there a fishery conservation purpose or reason?** N/A
11. **Does the agenda change request correct an error in regulation?** N/A
12. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 5:** Increase the season dates in which dip nets may be used under the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382)

Suggestion: TNA

Analysis

13. **Is there a fishery conservation purpose or reason?** N/A
14. **Does the agenda change request correct an error in regulation?** N/A
15. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 6:** Increase the number of days per week that dip nets could be utilized under the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382)

Suggestion: TNA

Analysis

16. **Is there a fishery conservation purpose or reason?** N/A
17. **Does the agenda change request correct an error in regulation?** N/A
18. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 7:** Allow the use of leads during dip net fishing periods described in the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382)

Suggestion: TNA

Analysis

- 19. **Is there a fishery conservation purpose or reason?** N/A
- 20. **Does the agenda change request correct an error in regulation?** N/A
- 21. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 8:** Add set beach seine nets as legal gear under the Kenai River late-run king salmon stock of concern management plan (5 AAC 21.382)

Suggestion: TNA

Analysis

- 22. **Is there a fishery conservation purpose or reason?** N/A
- 23. **Does the agenda change request correct an error in regulation?** N/A
- 24. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 9:** Increase the bag, possession, and size limits for rainbow trout in the Kenai River (5 AAC 57.120)

Suggestion: TNA

Analysis

- 25. **Is there a fishery conservation purpose or reason?** N/A
- 26. **Does the agenda change request correct an error in regulation?** N/A
- 27. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

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**ACR 10:** Expand time and area of the lower section of the Kenai River that bait is allowed (5 AAC 57.121)

**Suggestion:** TNA

**Analysis**

- 28. **Is there a fishery conservation purpose or reason?** N/A
- 29. **Does the agenda change request correct an error in regulation?** N/A
- 30. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

**Additional Comments**

N/A

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**ACR 11:** Create a Kvichak River Special Harvest Area to allow harvest of Kvichak River sockeye salmon while conserving Naknek River sockeye salmon (5 AAC 06.XXX)

**Suggestion:** TNA

**Analysis**

- 31. **Is there a fishery conservation purpose or reason?** N/A
- 32. **Does the agenda change request correct an error in regulation?** N/A
- 33. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

**Additional Comments**

N/A

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**ACR 12:** Create a new herring food and bait fishery in the Alaska Peninsula-Aleutian Islands Area (5 AAC 27.610)

**Suggestion:** TNA

**Analysis**

- 34. **Is there a fishery conservation purpose or reason?** N/A
- 35. **Does the agenda change request correct an error in regulation?** N/A
- 36. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

**ACR 13:** Reduce maximum depth of hand and purse seines, maximum length of leads, eliminate minimum length of leads, and allow leads to be attached to either end of a seine in the Alaska Peninsula Area commercial salmon fishery (5 AAC 09.332)

Suggestion: **Accept**, meets criteria

Analysis

- 37. **Is there a fishery conservation purpose or reason?** Yes
- 38. **Does the agenda change request correct an error in regulation?** No
- 39. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** Yes

Additional Comments

With multiple salmon species passing through the Alaska Peninsula and data showing large-scale bycatch for years, it's clear that this species of concern needs management action to ensure sustainability. This proposal addresses a significant conservation issue and should be accepted for review in the upcoming cycle.

**ACR 14:** Allow CFEC salmon set gilet permit holders who form a joint venture in the Central Section of the Northwest Kodiak District to operate 25 fathoms additional set gillnet gear (5 AAC 18.331)

Suggestion: **TNA**

Analysis

- 40. **Is there a fishery conservation purpose or reason?** N/A
- 41. **Does the agenda change request correct an error in regulation?** N/A
- 42. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A

**ACR 15:** Define the term 'unit of gear' (5 AAC 39.130)

Suggestion: **TNA**

Analysis

- 43. **Is there a fishery conservation purpose or reason?** N/A
- 44. **Does the agenda change request correct an error in regulation?** N/A
- 45. **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** N/A

Additional Comments

N/A