AGENDA CHANGE REQUEST FORM ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept these agenda change requests (ACRs) only:

- 1) for a fishery conservation purpose or reason; or
- 2) to correct an error in regulation; or
- 3) 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 compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

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: 21.358 Northern District Salmon Management Plan

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.

The current Northern District Salmon Management Plan provides little direction to the commercial manager, and during years of low or average abundance of sockeye and /or coho salmon too often results in shortages of one or both species as identified by the currently established Northern Cook Inlet escapement goals. Goal shortages cause difficult management decisions that too often severely impact specific users much more than other users. In addition, overly aggressive fishing early in the season can make it nearly impossible to attain goals later in the season.

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

I request that the Board conservatively and comprehensively amend the Northern District Salmon Management Plan to better accomplish the stated objectives listed in the preamble of the plan, and to better provide reasonable harvest opportunities for all Northern Cook Inlet user groups. Escapement goal trends, emergency restrictions or closures, new genetic harvest study information, and the economic information should all be incorporated in developing a plan that greater benefits more users than the current plan.

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:

Northern Cook Inlet sockeye salmon have a long history of failing to meet escapement goals or only meeting escapement goals after nonspecific emergency restrictions have been enacted. Likewise Little Susitna River and Jim Creek coho salmon shortages occur on such a frequent basis that a conservative adjustment of the management plan is necessary to prevent continuance of this problem. Recent genetic studies of commercially harvested fish can provide a better base for allowable commercial harvests.

b) to correct an error in regulation:

Unspecified emergency restrictions often more severely impact specific users and sometimes unnecessarily impact other users. In 2019 the Larson Creek sockeye salmon escapement shortage caused the entire closure of the sockeye salmon sport fishery at Larson Creek, yet the same shortage triggered no response in the Northern District commercial fishery. The plan states:

(b) the department shall manage the Northern District commercial salmon fisheries based on the abundance of sockeye salmon counted through the weirs on Larson Creek, Chelatna and Judd Lakes, or other salmon indices that the department deems appropriate.

Since it is appropriate to identify management restrictions in management plans based on salmon abundance for Central District salmon salmon fisheries (Kenai River salmon stocks) that same approach should also be used in the Northern District Salmon Management Plan. Some commercial response should occur when attaining a salmon escapement goal is in jeopardy.

In 2019 the Little Susitna River and Deshka River coho salmon sport fisheries were entirely closed to sport fishing starting August 21, and the set net fishery in the General Subdistrict of the Northern District was closed to commercial fishing starting August 21 — but genetic harvest study data likely shows Deshka River coho are more heavily harvested in additional commercial statistical area(s) that were not closed or even restricted. Commercial response to shortages of coho salmon escapements for the indicator stream for the entire Susitna River drainage (Deshka River) and commercial response for shortages of coho salmon in the most important coho salmon fishery in the Knik Arm Drainage (Little Susitna River) should be identified in management plan. Otherwise, Northern Cook Inlet management decisions have been, and will likely continue to be, unnecessarily unfair for many Alaskans.

Coho salmon are acknowledged by all user groups to be a very important Northern Cook Inlet salmon species. They should also be acknowledged as such in the plan, with consequences for all user groups in times of shortage.

Finally, in the past, the plan listed coho salmon as being managed **primarily** for sport and guide sport uses. I don't recall that language being removed from the plan and would ask was that word somehow left out possibly by mistake or error? Even if the change was adopted by the Board. I believe it should be re-examined, and that Northern sport and guided sport have that reasonable opportunity.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

"Minimize the incidental take of coho salmon" as defined in the current plan may actually maximize the Northern District commercial harvest of coho salmon more so than any other Northern District salmon species.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR

CYCLE. Opportunities for the average Alaskan to harvest salmon in Northern Cook Inlet drainages will likely continue to be closed by emergency order before the salmon reach Northern Cook Inlet waters. Some regularly scheduled Northern District and Central District commercial opportunities will likely continue to be closed by emergency order, when a conservative change could make the fisheries more stable and predictable for all users.

6)STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

There are allocative implications, however, the primary objective of this proposal is to provide a more reasonable, stable, and predictable fishery for all user groups.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE

New economic and Alaska Department of Fish and Game (ADF&G) genetic study data has been gained and should be used in providing reasonable opportunities for all user groups.

8)STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

I am a sport fishing guide greatly affected by emergency restrictions and closures on Little Susitna River. I am also a sport fisher that is affected by low inriver coho salmon numbers throughout the Northern Cook Inlet.

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.

No. There have been proposals to change specific parts of the Northern District Salmon Management Plan in the past — but no request that I am aware of to take a comprehensive approach in adjusting the plan.

SIGNA	TURE: Andrew N. Couch	DATE: August 26, 2019	
	individual of Group		
	Individual or Group		
NAME	Andrew N. Couch		

Note: Addresses and telephone numbers will not be published.

Submitted by:

Mail, fax, or e-mail this completed form to:
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: <u>dfg.bof.comments@alaska.gov</u>

AGENDA CHANGE REQUEST FORM

ALASKA BOARD OF FISHERIES

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Please answer all questions to the best of your ability.

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: 21.366 Northern District Kin Salmon Management Plan

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.

With a longterm downturn in Upper Cook Inlet king salmon production since 2007, Northern Cook Inlet sport and guided sport anglers have lost most of their opportunity to fish for and harvest king salmon in the streams of Northern Cook Inlet. The plan states: the department shall manage the Northern District king salmon stocks primarily for sport and guide sport uses in order to harvest these salmon over the entire run as measured by the frequency of inriver restrictions. The plan also states: The department shall manage the Northern District for the commercial harvest of king salmon as follows: . . . The problem is that there is simply not enough king salmon for everyone to enjoy all the fishing and harvest opportunity that was previously available.

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

I request the Board comprehensively examine and adopt a more conservative Northern District King Salmon Management Plan based on providing reasonable opportunity to all Alaskans and what king salmon production has been within the past 5-10 years. The Board should also consider the Board of Fisheries Finding developed when the Northern District King Salmon Management Plan was first adopted.

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:

Northern Cook Inlet king salmon spawning escapement goals have been missed to the extent that 6 king salmon stocks have already been adopted as stocks of concern by the Board of Fisheries. In addition, all Unit 2, Unit 3, Unit 5, and Unit 6 Susitna River king salmon stocks have not provide any legal inriver sport fishery yield for 6 years. In 2019 there was no legal king salmon sport fishery on the entire Susitna River drainage (even intentional catch and release was illegal). Unit 2, 3, 5, and 6 Susitna River king salmon and all other Northern Cook Inlet king salmon stocks should be considered by the Board as meeting the classification as stock of yield concern based on the recent history of the sport fishery. Even though 2019 Northern Cook Inlet king salmon spawning escapements improved compared to 2018 escapements, spawning viability was like negatively affected by record-breaking temperatures and record-breaking summer drought in Northern Cook Inlet. Local news has reported that such heat and drought events could become a much more regular occurrence in the future.

b) to correct an error in regulation:

Point 2 of the plan is so outdated it is no longer relevant. Since permit registration became a requirement there have been no commercial king salmon harvests close to this level.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

In recent times the percentage of king salmon harvest by the Northern District commercial set netters has increased as the sport and guided harvest percentage has decreased. In 2019 all inriver Northern Cook Inlet king salmon fisheries focussing on wild stocks were closed by emergency order before the rivers even thawed out. A very late sport fishing opportunity was opened on Little Susitna River after the weir based escapement goal was attainged. In 2019 the entire timeframe of the plan was closed to all Northern District commercial salmon fishing.

5)WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Unrealistic regulations in relation to the number of king salmon available will create unrealistic expectations that will continue to be broken by emergency restrictions and closures to all users.

6)STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

Changes in allocation could result from any change in the plan — however changes in allocation also result from different emergency orders issued on an annual basis. The big issue is there is simply not enough king salmon to provide the same level of fishery all Alaskans were provided in the period 12 - 30 years ago and regulations should be adjusted to recent return levels..

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE

A new Upper Cook Inlet economic sport fish study developed following ADF&G methodology is now available, along with new king salmon genie harvest data from the commercial fishery, and the recent history of emergency restrictions to the commercial, sport, and subsistence fisheries.

8)STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

I am a 35-year sport fishing guide who has guided for king salmon primarily on Little Susitna River, but also on Unit 1 and Unit 2 of the Susitna River drainage. I have also sport fished for Mat-Su Valley king salmon since the 1970's.

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.

No — although changes have been made to portions of the Northern District King Salmon Management Plan in the past.

Inc	dividual or Grou	ıp		
NAME	Andrew N.			

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

Submitted by:

AGENDA CHANGE REQUEST FORM

ALASKA BOARD OF FISHERIES

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Please answer all questions to the best of your ability.

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: NEW Little Susitna River Special Harvest Area

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.

Despite conservative sport fishery regulations that do not allow fishing with bait until August 6, set the sport coho salmon daily at 2 fish, require sport anglers to quit fishing for the remainder of the day after harvesting a daily bag limit of any salmon species, and an enlarged sanctuary area below the Alaska Department of Fish and Game's salmon counting weir, many years Little Susitna River coho salmon escapement numbers have been low enough to trigger emergency closure of the bait fishery, entire closure of the sport fishery, and in recent years restrictions on the Central District drift gill net fishery, and restrictions on the entire General Subdistrict of the Northern District commercial set net fishery east of the Susitna River.

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

Adopt a Little Susitna River Special Harvest Area consisting of all waters within one mile radius of the terminus of Little Susitna River with Knik Arm / Cook Inlet. Commercial harvest opportunities within this area should be limited in such a manner as to provide reasonable opportunity for commercial users fishing within the special harvest area, but not likely to negatively impact reasonable sport and guide sport opportunity on Little Susitna River, other General Subdistrict commercial set netters, or Central District drift gill netters.

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:

The Little Susitna River coho salmon escapement goal has not been attained several times, and on other occasions the goal has only been attained by restricting other users located far away from Little Susitna River and with a much lower harvest percentage of the Little Susitna River coho salmon.

b) to correct an error in regulation:

Not applicable

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

I believe future impacts of allowing commercial fishing within one-mile of the Little Susitna River stream mouth under standard regulations were not fully considered at the time. Upper Cook Inlet did not have any coho salmon escapement goals at the time, so how could the impacts of Little Susitna River coho salmon shortages to other users possibly be considered. Commercial fishing is limited or prohibited within one mile of nearly all Upper Cook Inlet streams with established salmon spawning escapement goals for good reason. That same rationale should be used in regulating harvest of Little Susitna River salmon stocks. Providing the greatest good for the greatest number of users should be considered and established in regulation. Regulation similar to the Kasilof River special harvest area could be implemented.

5)WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Unnecessarily large numbers of Upper Cook Inlet users will likely continue to be restricted in order to provide continued commercial harvest of salmon within one mile of the Little Susitna River.

More conservative commercial fishing within one-mile radius of the Little Susitna River terminus would change allocation, however, less emergency restrictions and closures for a much larger number of users would likely occur. Data from the Kasiloff River Special Harvest Area and fishing regulations should be considered for its relevance concerning percentage of Little Susitna River coho likely harvested in the proposed special harvest area.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

A new Upper Cook Inlet economic sport fish study developed following ADF&G methodology is now available and the impacts of recent Little Susitna River sport restrictions and closures should be considered through use of statewide harvest survey information and exit surveys from the Little Susitna River Public Use Facility.

8)STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

I am a 35-year sport fishing guide who has guided for salmon primarily on Little Susitna River.

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.

No — although a proposal requesting a one-mile commercial fishing sanctuary around the mouth of Little Susitna River was submitted by the Matanuska Valley Fish and Game Advisory Committee,

Duomin	ica by.			
NAME	Andrew N. Co	ouch		
	Individual or Group			
~~~~				
SIGNA	TURE: Andrew N. Co	ouch	_ DATE:	August 26, 2019

Note: Addresses and telephone numbers will not be published.

Submitted by:

# Tec'd 8/24

### AGENDA CHANGE REQUEST FORM ALASKA BOARD OF FISHERIES

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Please answer all questions to the best of your ability.

- 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: 5 AAG to 18 12316 b) The length of seine webbing used may be no more than 20 Fathoms per set.
- 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.

When the current 200 fathor regulation was instituted. Mr. Peterson was unavailable to state his case owing to his military service in vietnam. Prior to this time Mr. Peterson had been using a 25 fathorn lead at this site which is optimum for this location, we are seeking correction of this very long standing inequity so that transference of the site can move Forward (when ever the opportunity arises) with clarity.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say? To offer an exemption for two site or to recognize twis location (site) as being fermitted to use a 25 fatham lead.

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: $\mathcal{N}/\mathcal{A}$
10/4
b) to correct an error in regulation: $N/A$
N/A
,
c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
As Previously Stated two has been a long standing issue that is in need of correction.
is a seed of the seed of
is in near of convenien.
5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR
CYCLE? IF adopted or otherwise heard this issue could be scheduled
For the meeting in 2020 In Cyles

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.  Click here to enter text.  I do not believe 4mt This topic/issue is predoming allocative for it is dealing w/ one isolated set net site all iFit was decimed allocations of a fish to other permit holders w/ in the Alital district.
7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g. commercial fisherman, subsistence user, sport angler, etc.)  Hr. J.M. peterson is a commercial fraction with the Alvitak District.  I am peterson is a commercial fraction with the Alvitak District.  I am peterson is a commercial fraction with the Alvitak District.
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 believe the ossue was allressed once negroe in the entry 1990's.

Submitted by:

NAME Charles O. Swantow

Individual or Group

SIGNATURE: DATE: 8/86/19
Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

### ALASKA BOARD OF FISHERIES REGULATION PROPOSAL FORM 2015-2016 PO BOX 115526, JUNEAU, ALASKA 99811-5526

*Indicates a required field

BOARD OF FISHERIES REGULATIONS			
Subsistence Personal Use			
Sport X Commercial			
*Which meeting would you like to submit your proposal to?			
Alaska Peninsula/Aleutian Arctic-Yukon-Kuskokwim Areas Finfish Island/Chignik Finfish			
☐ Bristol Bay Area Finfish ☐ Statewide Provisions for Finfish			
Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.			
1. Alaska Administrative Code Number 5 AAC 5AAC 21.365			
*2. What is the issue you would like the board to address and why?  The Kasilof River sockeye salmon BEG goal has been exceeded 17 out of the last 20 years. The optimal escapement goal described within (c) (5) should be changed to the biological escapement goal (BEG) and the upper range described within this paragraph provision would be 320,000 fish.  Note: escapement above 340,000 can result in the loss of 300,000 sockeye salmon (lost production) as communicated by ADFG research staff.			
*3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)  (c) (5) after July 15, if the department determines that the Kenai River late-run sockeye salmon run strength is projected to be less than 2,300,000 fish and the 390,000 optimal escapement goal for the Kasilof River sockeye salmon may be exceeded, the commissioner may, by emergency order, open fishing for an additional 24 hours per week in the Kasilof Section within one-half mile of shore  Replace underline area with "the 320,000 biological goal"			
*Submitted By: Jeff Beaudoin Individual or Group			

*Address *City, State *ZIP Code