



MATANUSKA-SUSITNA BOROUGH

Planning and Land Use Department

Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

www.matsugov.us

To: Alaska Board of Fisheries

From: Matanuska-Susitna Borough Fish and Wildlife Commission

Date: February 7, 2024

Re: Comments on 2024 Upper Cook Inlet Finfish Proposals

I. Preamble

The following comments are submitted on behalf of the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC). The MSB FWC represents the interests of the Borough in the conservation and allocation of fish, wildlife and habitat. Specifically, the FWC advises borough officials, state or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area the size of West Virginia. Within this area, residents fish commercially, personal use dip net, sport fish, and four indigenous communities were long-time subsistence users — Chickaloon, Knik, Eklutna Village, and Tyonek. The members of the FWC combined bring well over 100 years of experience managing fish and wildlife resources within Alaska.

Proposals were evaluated, and comments generated, based on six (6) goals the FWC established for the upcoming Board of Fisheries UCI meeting:

1. Long-term salmon conservation and protection of salmon habitat.
2. Maintain and enhance the Conservation Corridor in the drift gillnet fishery management plan.
3. Clarify or strengthen conservative management practices which provide protection for current and formerly identified Stocks of Concern.
4. Increase inriver returns of coho and sockeye salmon to Northern Cook Inlet systems.
5. Adjust existing king salmon management plan and strategies to more adequately address conservation concerns for king salmon returning to Northern Cook Inlet drainages.
6. Maintain or extend Personal Use fishing opportunity for Alaskan residents fishing Northern Cook Inlet drainages.

These goals are detailed in the attached publication entitled ["It Takes Fish to Make Fish 2024"](#)

MSB Fish and Wildlife Commission Proposal Positions

Process: BOF proposals of interest were evaluated in a designated FWC work group. The recommendations from this work group were then returned to the full commission, where final positions were agreed to by commission consent.

Providing Outstanding Borough Services to the Matanuska-Susitna Community.

We have ordered our comments to follow the published UCI BOF Agenda dated 1/24/24. The agenda provides the organizational approach the Board will take. In the case of the 2024 UCI BOF Road map, we anticipate some procedural difficulties.

Specifically, until the impacts of Federal management in the EEZ are accounted for within the Central Drift Gillnet Management Plan, it is very difficult to assess the benefits/threats of other proposals affecting Northern bound stocks. The uncertainty and potential threat posed by the EEZ cannot be understated. Current discussions regarding Total Allowable Catch (TAC) within the EEZ is shocking, and when coupled with a lack of timely inseason responsiveness within the Federal management system leaves the Board with little alternative except to apply the precautionary principle to fisheries within their management authority. With that in mind, the MSB Fish and Wildlife Commission recommends:

- 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof section to commercial drift gillnet fishing.
- 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following: the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor.
- 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system. Meaning that a vessel registered for fishing in State waters cannot participate in the Federal EEZ fishery.

Further, we urged in a letter to Board Chairman Wood to consider managing the meeting such that Committee of the Whole Group 6 Central District Drift Fishery Management Plan is placed ahead of Group 2 Northern District Fisheries Management first on the Boards agenda.

II. Matanuska-Susitna Borough Fish and Wildlife Commission Comments on Proposals

Committee of the Whole – Group 1: Kenai River Late-Run King Salmon Action Plan

The MSB FWC encourages the Board to consider limiting pink salmon hatchery production, as called for in Proposal 43, as a means to reduce competition with juvenile king salmon. There is uncertainty in the driver behind the decline of western Alaska king salmon stocks, however, many suggest it is an ocean-related event in the early stages of development. Dramatic declines, as we have seen in Cook Inlet stocks, calls for conservative management actions and application of the precautionary principle. A July 12, 2023 report in Fisheries Management and Ecology, in which a global literature search of peer-reviewed publications (1970–2021) evaluated how hatchery salmonids affected wild salmonids, found that hatcheries commonly have adverse impacts on wild salmonids in freshwater and marine environments. We believe reducing competition by reducing pink salmon hatchery releases, may assist with king salmon recovery.

The MSB Fish and Wildlife Commission elected to not address this group of proposals.

Committee of the Whole – Group 2: Northern Cook Inlet Subsistence, Northern District Commercial, Smelt, and Susitna River Sport and Personal Use Fisheries (29 proposals)

Any action taken by the Board in Northern District fisheries can only reasonably be considered after addressing the combined impact of the Federally Managed EEZ and the Central District Driftnet fishery. The emergence of the EEZ and associated estimates of Total Allowable Catch (TAC) cast an unprecedented

level of uncertainty on the sustainability of salmon stocks now subject to two commercial fishing management systems. The situation demands application of the precautionary principle that guides the Board to err on the side of conservation. Therefore, the MSB FWC will generally be opposed to any expansion of harvest potential in the Northern District fisheries and will seek additional conservation-based actions in the state-managed sockeye and coho salmon fisheries within the Central District to counteract the impacts of the federally managed EEZ.

Additionally, we are seeking measures to ensure fish (primarily kings and cohos) that make it into the Northern District are allocated in accordance with Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users.

[Northern Cook Inlet Subsistence](#)

204 Yentna Subsistence Salmon allow use of sport gear

No Action

Rationale: Under state law, subsistence has a priority over other users, however this does not mean that all methods are applicable under a subsistence harvest. What does need to be provided is a reasonable opportunity to harvest and does not mean a guaranteed harvest.

If adopted by the Board, a season closure should occur for king salmon conservation based on a Board-identified metric trigger that should be consistently applied to all Northern Cook Inlet subsistence fisheries targeting king salmon during times of shortage. There is also a question regarding the enforceability of a 3 king per family permit.

[Northern District Commercial Salmon](#)

205 Close stream mouths to commercial set net fishing in the Northern District

Support

Rationale: This proposal will help clarify regulatory language by identifying waters closed to commercial fishing for salmon in the Northern District King Salmon Management Plan permanently rather than by emergency order. Prior actions by the Board to close the sport fisheries in waters of the Theodore, Lewis, and Chuitna rivers in response to them being identified (2011) as SOC. Because the sport fishery is closed under regulation and cannot be opened, the Alaska Department of Fish & Game (ADF&G) is forced to issue an emergency order every year to close these marine waters. Cleaning up the regulatory language by eliminating unnecessary language will benefit the public, ADF&G, and enforcement. This area would only be closed during the directed Northern District king salmon fishery.

206 Reduce from 12.5k to 2,000 the maximum number of king salmon that may be taken annually

Support

Rationale: The current cap of 12,500 king salmon (established in 1986) is inconsistent with the current condition of king salmon production and abundance. Current annual directed harvests average only 2,000 per year with an incidental harvest of another 200 – 500 per year taken in the sockeye salmon commercial fishery. This proposal will “right size” management targets to reflect actual stock conditions.

207 Shared Harvests and Paired Restrictions in Northern District King Salmon Management Plan

Support Concept

Rationale: The specific allocation directive of the Northern District king salmon management plan calling for a full season of reasonable harvest opportunity for sport, guided sport, and other in river users is not being met. This proposal set a maximum allowable commercial harvest of 15% of the total combined sport

and commercial king salmon harvest and creates paired restrictions on the commercial fishery should conservative actions be taken in the sport fishery.

We recognize the inseason difficulty, however, this would establish a post season report card that helps define the allocative target found within the management plans. We fully support the sharing of the burden of conservation through the paired restrictions.

208 Paired King Salmon Closure of Sport Fishery(s) / Northern District Commercial Fishery (Mat-Su AC Proposal) Support

Rationale: The current management practices are not meeting the standard for managing in accordance with Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users. Prior years of lost opportunity for inriver sport users have not been met with commensurate restrictions in the commercial fishery. Institution of paired restrictions is a time-tested method to attain balance between users, share the burden of conservation, and address allocative decisions by the Board.

209 Close commercial set net fishery by regulation Oppose

Rationale: Management plans, if followed, provide sustainable management and afford a directed allocation established by the Board among beneficial users. We do not favor elimination of a single group when and if salmon abundance allows for a shared benefit. Rather, we are actively supporting Board action to fully implement stated Management Plan purposes; “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” as is CLEARLY established in the Northern District King Salmon Management Plan through additional restrictions (not closure) of the Northern District king salmon commercial fishery.

210 Adopt an abundance-based model for managing the Northern District commercial fishery and additional conservative measures into the management plans for commercial set net fishing Support

Rationale: This proposal elevates the standards for managing the Northern District commercial fishery by adding the Little Susitna River weir to the mix of indicators that ADF&G is obligated to consider and provides specific management targets. It establishes commercial fishing management direction at the mouth of the Little Susitna River based on king salmon and coho salmon abundance as measured at the Little Susitna Weir.

This proposal was submitted in the event the Board may decide NOT to establish a one statute mile commercial fishing closure around Little Susitna River terminus (Proposal 137). If the Board preferred this option, then commercial fishing within one statute mile and up to 500 yards from the river terminus would only be allowed when Little Susitna River weir counts started exceeding established king salmon and coho salmon escapement SEGs, and also when only a small number of sockeye salmon had also migrated past the weir. The sockeye salmon numbers in this proposal are not part of any goal, because ADF&G has not established a Little Susitna River sockeye salmon escapement goal. The purpose of sockeye salmon trigger numbers, in this proposal, is to illustrate: The Little Susitna River sockeye salmon stock is in such poor condition, commercial fishing should likely NOT be allowed to operate within one statute mile of the Little Susitna River terminus with saltwater.

These proposed actions will help correct the disregard for the stated management plan purposes for “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” and the continued decline of king salmon and coho stocks of the Little Susitna River.

211 Liberalize gear and time restrictions on set net fishing in the Northern District that were adopted as part of the action plan for Stock of Management Concern Susitna sockeye

Oppose

Rationale: Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. The current Board-adopted mandate “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” is not being met and this proposal will further exacerbate that condition.

Northern District commercial fishing regulations are liberal enough that emergency restrictions or closures of the fishery must occur — every year — to meet ADF&G established salmon spawning escapement goals. Over the past 15 years, reduced abundances of salmon making it upriver has greatly diminished harvest opportunities for Northern Cook Inlet inriver users. Expanding Northern District commercial harvests at this time would exacerbate that problem. In addition, federal management of Cook Inlet has great potential to reduce salmon migration into Northern Cook Inlet.

212 Adopt more conservative measures into the management plans for commercial set net fishing
Support Concept

Rationale: This proposal establishes a single 35 fathom net limit from June 25 until closed by EO in the Northern District set net commercial fishery. By establishing commercial regulations at a more conservative level, that remain static for the season, all other users would have a better opportunity of fishing on a proportionally similar harvestable surplus, as commercial users currently do, throughout the entire run. We are unclear as to how, or if, ADF&G can apply the target of 30% of the total Northern District coho salmon harvest limitations as called for in the proposal, other than as a post-season assessment.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to fish at current full strength in the Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

213 Pair restriction to one set gill net with opportunity for personal use in the Susitna personal use fishery
Support Concept

Rationale: This proposal also (see proposal 212) calls for a single 35 fathom net to be legal fishing gear in the Northern District set gillnet fishery. It adds the caveat that if the Lower Susitna Personal Use (PU) Fishery is extended based on abundance of coho and sockeye, then the Northern District fishery may be permitted to use two nets. This proposal seeks to balance opportunity for many Alaskans in the PU and inriver fisheries, with opportunity for a limited number of commercial setnet permit holders. Paired restriction is a common and effective practice within the Board process. This proposal links fishing power within the set gillnet fishery with extended opportunity in the PU fishery for upriver users.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet

within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

214 Pair restriction to one set gill net and time restrictions for commercial set net fishing to increase opportunity to sport fish in Little Susitna and in Susitna personal use fishery Support Concept

Rationale: This proposal addresses the continued frustration of many who fish freshwaters of the MSB and other Northern Cook Inlet drainages. Despite Board-adopted language within section (a) of the Northern Cook Inlet Management plan, "The department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport, guided sport fishermen, and other inriver users a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the number of inseason restrictions, or as specified in this section and other regulations.", a larger share of Northern District coho salmon are currently harvested in the Northern District set gill net fishery with inriver fisheries often experiencing delayed, restricted, or closed harvest opportunities. Limiting the Northern District commercial fishery to one net per permit from June 25 - July 13, and to two set nets per permit from June 14 - 19 should allow more salmon migration into the rivers, during a portion of the season with overall lower salmon abundance levels, better sharing the available early season harvestable surplus between commercial and inriver users. Starting July 20 allowing one set net in the General Subdistrict and up to two set nets in the Eastern Subdistrict is a management strategy the department has used to attain adequate Susitna sockeye salmon escapement ranges, however, this proposal would pair any later expanded Northern District commercial net opportunity with adequate projected salmon to allow the lower Susitna River personal use fishery to continue into August, and also with adequate projected salmon abundance to liberalize the Little Susitna River sport coho salmon fishery. The maximum Northern District commercial nets allowed would be 2 per permit through September 30. Proposed regulation(s) would likely allow more salmon passage into Northern District freshwaters throughout the season and would specifically allow additional coho salmon inriver migration during August and September, and thereby improve inriver salmon harvest opportunities.

131 Add Wednesday as a third regular period for set nets Oppose

Rationale: Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

Cook Inlet Smelt

216 Reduce the commercial smelt guideline harvest level No Action

217 Repeal the Cook Inlet Smelt Fishery Management Plan No Action

Susitna River Sport

218 Allow harvest of small (under 24 inch) king salmon in portion of the Susitna Drainage when otherwise closed Oppose

Rationale: This proposal would allow the harvest of small male (between 20 and 24 inches) king salmon in Unit 4 of the Susitna drainage. It is unclear the way the proposal is written what the daily and seasonal limit would be, making it difficult to fully evaluate. 20-24" king salmon are predominantly male and

contribute little to the viability of the spawning escapement which is far more influenced by the number of large female kings. Allowing a limited number of 20-24" king salmon for harvest would not likely jeopardize the productivity of the return. However, the way the proposal is drafted we cannot support it.

219 Close fishing for all species within confluence areas of Park's Highway streams and Susitna when fishing for king salmon is closed **Defer to ADFG**

220 Open additional waters to sport fishing for coho in Big River Drainage **Defer to ADFG**

221 Increase daily bag and possession limit for coho salmon back up to three a day and in possession from two **Defer to ADFG**

Rationale: Under current management authority and when coho stocks reach an abundance to support a 3 fish limit ADF&G currently has the authority to increase the limit from 2 to 3 or higher. This proposal speaks to the frustration that Susitna drainage sport fishermen have with respect to the chronic pattern of ignoring the Board mandated directive "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users." Reestablishing a 3 fish bag limit can be accomplished if restrictions in the Central District Drift gillnet fishery occur as well as those called for in the Northern District Commercial Fishery. Such changes could logically deliver more coho to Northern District streams and therefore allow the reinstatement of an additional fish to the bag limit.

However, until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolve there is no responsible way to consider liberalizing Northern District commercial fisheries as some have called for. Greater protections for the Conservation corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

222 Allow harvest of six pink salmon per day in addition to bag limit for chum, sockeye and coho within the Susitna River Drainage **Support**

Rationale: Pink salmon are the most abundant salmon in the Susitna River drainage and as such can provide additional harvest opportunity for those who wish to take them.

223 Special management areas for rainbow trout in Susitna **Oppose**

Rationale: This proposal would add the Susitna River, from Alexander Creek to Devils Canyon from Sept 15 – May 15 to the waters managed under catch and release special management restrictions that include no bait. Stocks in this river section are not reported to be a declining condition and the waters proposed for Special Management have not had a management history that would meet necessary criteria for selection and management as a Special Management water. Numerous other fisheries are currently under special management designations and therefore address the demand for diverse fishing opportunities.

224 Special management areas for rainbow trout in Susitna **Oppose**

Rationale: See comments for proposal 223.

225 Increase harvest of rainbow trout **Oppose**

Rationale: This proposal seeks to increase harvest opportunity for rainbow trout to reduce their presumed predatory impact on depressed salmon stocks. There is no precedent in management or scientific evidence to support the assertions that rainbow trout predation is somehow linked to depressed salmon populations. To increase harvests will necessarily diminish the quality of the rainbow trout recreational fisheries.

226 Dropper flies

Oppose

Rationale: This proposal seeks to allow two flies to be used in tandem (dropper) and rightly points out that this is common gear in most trout waters of the American west. However, missing from those waters are salmon and the potential affect that adding gear to the fishery may have on catch rate of other species is of concern.

227 Increase harvest of Dolly Varden

Defer to ADFG

[Susitna River Personal Use](#)

228 Close dipnetting in the vicinity of Anderson Creek during the personal use fishery on the lower Susitna River

Support

Rationale: This is an ADF&G proposal that provides necessary protection for Anderson Creek coho which are susceptible to over harvest if targeted in the Susitna River personal use fishery. ADF&G considers this a housekeeping measure following the establishment of the personal use fishery in 2020.

229 Add two days per week to dipnetting in the lower Susitna River personal use dip net fishery

Support

Rationale: There have been numerous allocative proposals before the Board to take actions that allow inriver users the opportunity to harvest sockeye and coho salmon. Depending on the prior actions of the Board, this proposal is a viable option to redistribute opportunity to Alaskans who would like to harvest salmon for personal use. The fishery would remain managed through Emergency Order (EO) should a lack of abundance dictate a conservative action be taken.

230 Add day per week and extend date during which the personal use fishery in the lower Susitna River is open

Support

Rationale: There have been numerous allocative proposals before the Board to take actions that allow inriver users the opportunity to harvest sockeye and coho salmon. Depending on the prior actions of the Board, this proposal is a viable option to redistribute opportunity to Alaskans who would like to harvest salmon for personal use. The fishery would remain managed through EO should a lack of abundance dictate a conservative action be taken. It is anticipated that this additional time would result in a minimal increase in PU harvest.

231 Shift the dates during which the personal use fishery in the lower Susitna River is open later by one week (Matanuska-Susitna Borough Fish and Wildlife Commission Proposal)

Support

Rationale: Management plan intent is clear: "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users" to harvest these resources over the entire run. The board created this fishery with conservative opportunity during the last board cycle. Personal use harvests have been modest during the first three years of this fishery and harvest data indicates the first Saturday and Wednesday (up to one third of the

annual personal use harvest opportunity in this fishery) occur before there are many salmon available for harvest. Harvest data and ADF&G Susitna River drainage fish wheel and weir data indicate better abundance of the 4 salmon species open to harvest in this fishery later in the season. Shifting to a later opening will enhance harvest opportunity in the PU Fishery.

Committee of the Whole – Group 3: Cook Inlet Areawide Sport Fisheries, Knik River Area Sport Fisheries, and Anchorage Area Sport and Personal Use Fisheries (24 Proposals)

[Cook Inlet Areawide Sport Fisheries](#)

232 Allow Alaska residents to buy more than one sport fishing license and take additional daily bag limits **Oppose**

Rationale: Alaska sport fishing regulations and management systems have effectively regulated seasons, bag limits, methods and means for decades. Additional licenses are not necessary to realize additional harvest under the current system. Bag limits can be adjusted when warranted and seasons can be extended. The parallel drawn by the proposer with permit stacking in the commercial fishery is misplaced.

233 Establish additional criteria for sport fish derby **Oppose**

Rationale: This proposal seeks to require specific stock assessment programs take place in advance of approval for a sport fishing derby. These factors are already considered within the approval process and there is no history of an approved derby contributing to a stock decline.

[Knik River Area Sport Fisheries](#)

234 Clarify the northern boundary of the Knik Arm Management area and the Palmer Wasilla Zone and exclude certain flowing waters from the Palmer-Wasilla Zone (ADF&G Proposal)

Support

Rationale: Northern pike have become prolific in certain flowing waters within the Palmer-Wasilla Zone, but springtime closure of flowing waters within the zone designed to protect spawning rainbow trout also protect northern pike in certain waters where they have taken a stronghold. Excluding certain flowing waters where northern pike exist would increase northern pike harvest in those waters.

235 Reduce size of the Palmer-Wasilla Zone **Support Concept**

Support Concept but refer to Proposal 234.

Rationale: Waters of the Palmer – Wasilla zone has an April 15 - June 14 closure to protect spawning rainbow trout, however a portion of this closure area now may be primarily infested by invasive northern pike (similar to Proposal 234), with few significant populations of rainbow trout remaining to utilize flowing waters. This portion of the season could provide an opportunity to remove more invasive northern pike with little insignificant impact on rainbow trout in a specific portion of the current Palmer- Wasilla zone. If the Board moves forward with this proposal we recommend amending it to specify non-retention of species other than northern pike.

236 Bookkeeping by ADFG **Support**

Rationale: This proposal updates the stocked lakes list for the Knik Arm drainage. Stocking has been discontinued in one lake and newly initiated in several lakes. Without action, anglers may miss the benefit

237 Allow bow and spear for Northern Pike and Blackfish

Support

Rationale: Invasive northern pike and Alaska blackfish have been found and documented in various waters in the Knik Arm and Susitna River drainages, several of which fall in the "Palmer-Wasilla Zone Flowing Waters" management area. This management area is open to fishing June 15 - April 14, which excludes the spawning season for rainbow trout, as well as that of northern pike. This denies an excellent opportunity for selectively harvesting northern pike with a bow-fishing setup when they are in shallow waters for the spring spawn, and tend to allow people to approach more closely. We question inclusion of Blackfish in an archery and spear proposal. Blackfish are very small fish averaging approximately 4", some have been reported larger up to 13". We are unaware of a fishery in the MSB focused strictly on Blackfish.

238 Establish a motor size restriction for the Little Susitna River, no size suggested

No Action

Rationale: We took no action on this proposal as we believe it needs more discussion. With the knowledge we have of the impact on rivers experiencing large number of users navigating with boats equipped with large horsepower motors there may be a need for limitations in the Little Su as have been adopted for high use waters of the Kenai.

239 Adopt a large fish escapement goal for king salmon on the Little Susitna (no suggested size for large fish offered)

Support Concept, but Defer to ADFG

Rational: Large fish escapement goals for king salmon more precisely address escapement goal development and stock productivity. Where the technology to monitor and the data exist, establishment of large fish escapement goals for king salmon are a preferred management tool.

240 Increase the time during which bait can be used in the Little Su to from July 13 and not from August 5

Oppose

Rationale: ADF&G already has the authority to regulate the use of bait through their EO authority.

241 Pair use of bait in Little Su to openings in Northern District set net fishery

Oppose

Rationale: This proposal speaks to the frustration in-river users are expressing over the chronic disregard in management practice ignoring the Board mandated directive "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users." We do not think this approach is practical, but we understand the frustration and urge the Board to look to other proposal vehicles to address this valid concern.

242 Prohibit catch and release of coho salmon in the Little Susitna downstream of the weir at all times and mandate retention

Oppose

Rationale: ADF&G has deemed the regulations governing this fishery and the practice of catch and release specifically to be sustainable. Unnecessarily limiting opportunity as proposed is detrimental to the sport fishing public who utilize these waters.

243 Restore bag and possession limit of three coho, up from two

Defer to ADFG