
ALASKA BOARD OF FISHERIES

Work Session

Anchorage | October 28-29, 2025

On-Time Public Committee Comments

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Ahtna Intertribal Resource Commission

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To: Alaska Board of Fisheries

Re: Comments on ACRs – Conservation Concern for CR Chinook salmon

We are submitting these comments regarding ACR #2 and #3, which puts into regulation geographic restrictions of the Copper River District commercial fishery similar to emergency closures instated during the 2025 season. During this past season, the Department successfully demonstrated they can manage the commercial fishery for conservation of Copper River Chinook salmon while maintaining sockeye salmon harvest.

There is a conservation concern for Copper River Chinook salmon. It is well documented that Copper River Chinook salmon have been in a period of low abundance since 2008. Failing to reach the escapement goal has been a pattern we see increasing in regularity. We encourage the Board to consider that conservative measures taken by commercial fisheries management in 2025 including the delayed opener and geographic closures (similar to the ACRs) were very effective, evidenced by limited Chinook harvest of approximately 5,500 (about 7,000 less than the 10 year average) while still allowing sockeye harvest of 800,000 (nearly half of the total run). The Department has demonstrated these tools work, so why should they not be used during this period of low abundance?

In recent years, commercial, sport, and subsistence fishermen have seen closures and restrictions to help conserve Chinook salmon. There is clearly a concern. No user group wants to see the extirpation of this resource.

Karen Linnell
Executive Director



Post Office Box 1229 / Sitka, Alaska 99835 / 907.747.3400 / alfastaff@gmail.com

Alaska Board of Fisheries
PO BOX 115526
Juneau AK 99501

Oct 13, 2025

The Alaska Longline Fishermen's Association (ALFA) respectfully requests that the Board of Fisheries reconsider their decision to not address the unguided sportfish proposal submitted by the Sitka Advisory Committee. ALFA strongly recommends the Board of Fisheries take up this proposal at the Statewide finfish meetings scheduled for March 2026.

Although ALFA was not directly involved in generating this proposal, we have been engaged on halibut management issues for decades and we have watched this particular issue of managing the halibut sportfish fishery be bounced from the Board of Fisheries to the North Pacific Fishery Management Council to the International Pacific Halibut Commission with no entity taking appropriate responsibility for finding a management solution. This issue deserves a public hearing, which it would receive at a Board of Fisheries meeting, and the identification of a path toward a management solution. That is what the Sitka AC has requested of the BOF—the identification of a path toward a management solution with each engaged entity doing their part to contribute and coordinate toward finding that solution. The AC recognizes the responsibility does not rest solely with the BOF, but they also recognize that if every managing entity with some responsibility refuses to address this issue the challenges will continue to increase.

As the Sitka Fish and Game Advisory Committee explained, the proposal was submitted to the BOF for statewide consideration at the recommendation of Commissioner Vincent-Lange. The proposers have worked diligently to follow protocol and high-level advice. ALFA also agrees with the Sitka Fish and Game Advisory Committee that the rationale listed for not accepting the proposal appear incongruous with the proposal itself. To be more specific:

Action items 1 thru 3 do not ask any entity of the State to reduce halibut harvest by the user group in question, they only ask the State to:

- 1.) Define the user group in question so they can be more readily identified as a separate user group;
- 2.) Encourage the department to require the user group in question to register as such (something the department already requires of charter vessels);
- 3.) Encourage the department to start breaking out harvest data for this user group in both their ongoing dockside creel and mail out surveys.

Only in the last action item of the proposal (#4), does the Advisory Committee ask for any actual

management of halibut, and that item simply asks that the Department request the NPFMC to take some specific actions regarding the halibut harvest by the user group in question. This section does not ask any entity of the State of Alaska to take any direct action to manage halibut harvests.

In closing, ALFA considers this issue of sufficient relevance and importance to be included in the Statewide Finfish Meetings scheduled for March 2026. We ask the BOF to reconsider the decision relative to the proposal and to schedule it for consideration in March.

Thank you for your time and consideration,

Linda Behnken
Executive Director

Submitted by: Rod Arno

Alaska Outdoor Council

Community of Residence: Eagle River

The Alaska Outdoor Council (AOC) and its member club the Chitina Dippnetters Association represent thousands of Alaska residents asking the Board of Fisheries (BOF) to correct their implementation of 5 AAC 99.010 regarding restrictions on the opportunity for individual Alaskans to gather their salmon harvest from the Copper River.

AOC asks that the BOF adopt which ever of ARC 1 through 4 that the majority of Borad members finds acceptable.

The BOF has repeatedly misinterpreted the Alaska Supreme Court's opinion in the 2012 case regarding whether the Chitina District fishery was a subsistence or personal use fishery. The BOF has failed to consider changes in the 8 listed criteria in AAC 99.010.

Adopting any of the 4 ARCs regarding limitations on commercial salmon harvest at the mouth of the Copper River drainage could allow Alaskan not living in Cordova to share their public comments regarding their desire to catch their own salmon.



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**Comments on ACR 5 and ACR 6 – Northern District Coho Salmon
Submitted to the Alaska Board of Fisheries**

I respectfully urge the Board of Fisheries to reject ACR 5 and ACR 6 because they do not meet the criteria for acceptance under 5 AAC 39.999. No unforeseen event, regulatory error, or conservation necessity has been demonstrated. The issues cited are long-standing, predictable, and fall within the Department's existing management authority. The biological data used to justify these requests, particularly coho escapement counts from the Deshka and Little Susitna Rivers, are unreliable due to chronic weir failures and persistent environmental challenges.

The Deshka River weir frequently fails during the coho migration period, producing incomplete and inconsistent escapement counts. Although the weir typically operates from late May through mid-September, flooding and high water temperatures often disrupt operations. Early-season low flows and temperatures near 20 °C delay migration until cooler rains arrive, and when fish movement increases, the weir is often damaged or removed due to flooding. These failures occur during peak passage, making accurate escapement estimation difficult or impossible. The Little Susitna River weir experiences similar interruptions, poor visibility, and shortened operating periods that routinely miss significant portions of the run. These long-term monitoring limitations are well documented in ADF&G's annual reports and do not represent a new conservation problem.

Under 5 AAC 39.999, an Agenda Change Request must address a conservation concern, correct a regulatory error, or respond to an unforeseen event arising after the last regular cycle. ACR 5 and ACR 6 meet none of these standards. The concern raised is data uncertainty, not a verified conservation issue. There is no regulatory error, ADF&G already has authority to manage harvests through emergency orders and the environmental and operational challenges cited have been recurring for years. As ADF&G noted in RC 2, these ACRs fail to meet the criteria for acceptance.

For these reasons, I respectfully request that the Board decline to accept ACR 5 and ACR 6.

A handwritten signature in blue ink, appearing to read 'Norm Darch', is written in a cursive style.

Norm Darch
Executive Director
Alaska Salmon Alliance

Submitted by: Wade Buscher

Community of Residence: Eagle River

Dear Ak BoF, I am an Alaska resident, and live and work as a commercial fisherman in Cordova. I thoroughly agree and support the comments presented by CDFU in opposition to ACR's 1-4, 8. During the BoF cycle back in Dec 2024, through tireless testimony and discussion, the Board agreed to curtail time and area of the Copper River commercial fishery to promote King salmon conservation. Not a year has passed, and we're once again tasked to comment on further commercial fishery restrictions on the Copper, and this before all numbers have been examined and made public.

"Given that these measures were recently enacted through the regular meeting cycle, and no new information has emerged, we see no justification for reopening the same topic out-of-cycle." CDFU

Thank you



OPPOSITION OF ACR 8

10/13/25

From: Tyler Dillon
General Manager
Camtu's Alaska Wild Seafoods
PO BOX 1502
Cordova, AK 99574

To: Board Of Fish

Dear BOF:

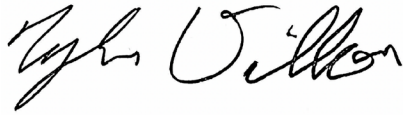
We are writing to oppose ACR 8 and provide comments on this unique fishery. For the past several years we have been the primary buyer of fish harvested from the Kaliakh and Tsiu rivers. These fish have all been boated to Cordova. It is common knowledge that there is an abundance of fish in both rivers and each has no concerns for conservation. Historically it has been difficult to develop lasting methods to harvest and bring to market these fish. Since 2018, a group of 4 operators based out of Cordova have been successfully boating fish to Cordova. This has been the only type of this kind of extraction method from rivers of the Yakataga subdistrict. All other fish have been flown out.

There is only a small section of the Kaliakh river that has deep enough water to operate boats in. The entirety of the Tsiu is too shallow to operate in. In years like 2024 and 2025 this ACR would close off the small area with enough water and force the same few boats that participate, 1) to either fish way low on the bar in the breakers, which is unsafe and mostly unfeasible, or 2) it would push them above the confluence to an area of the river that is too shallow to operate except at higher stages of the tide. The latter area is a great concern for the quality and value of the fish as they would have to leave their nets unattended in the water for the duration of low water, and only be able to pick their nets at high water. It takes about 17-18 hours to boat fish to Cordova and it is imperative to harvest fish often and chill them immediately. Having no concerns of conservation with either of these river's stocks, this ACR should be dismissed.

Also to note, there is a significant 'dance' to coordinate this fishery around the many natural obstacles that we face (weather, tides, ocean swell, and market availability) amongst the harvesters, the biologist and us the market. There always has been close communication between us to make this fishery happen. Biologist Richard Hoffman carefully monitors catch and has already created a buffer zone of closed waters within 100 yards of the confluence. Any additional regulatory burdens of closed waters are unreasonable and uncalled for in the absence of any conservation concerns, as the biologist knows immediately what is harvested when and has all authority to restrict harvesters and/or set boundaries.

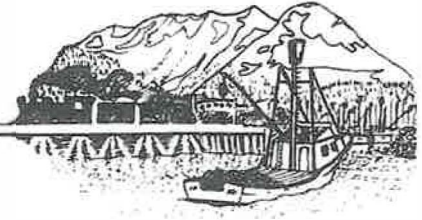
We have also been aware and can clearly see on satellite imagery that the Tsiu joined as a tributary to the Kaliakh in 2024 and continued through the 2025 season. It sounds like the author is misconstruing this gradual change in the rivers as some urgent situation that the Board needs to take up. It is nothing more than an attempt to take over an otherwise underutilized resource.

Sincerely,

A handwritten signature in black ink, reading "Tyler Dillon".

General Manager
Camtu's Alaska Wild Seafoods

CITY OF CORDOVA



To: Chairperson Marit Carlson-Van Dort
Alaska Board of Fisheries
10/02/25

Dear Chairperson Marit-Van Dort & Members of the Board,

I am writing to respectfully urge the Board not to adopt the Agenda Change Requests (ACRs) relating to the Copper River gillnet season. The proposals under consideration do not meet the requirement that an ACR demonstrate a conservation purpose supported by sufficient data.

In 2024, the Board of Fisheries adopted significant conservation measures to reduce king salmon harvest in the Copper River fishery to conserve kings. These actions represented substantial sacrifices by Area E gillnet permit holders and were designed to provide additional protection for the stock. The results of those measures have not yet been fully realized. Considering further restrictions before those outcomes are evaluated would be premature and inconsistent with the Board's ACR criteria.

Data gaps further underscore why these ACRs should not move forward. We do not yet have data from the federal subsistence fishery. The Native Village of Eyak's mark-recapture program faced challenges in 2024 and 2025, leaving only fleet harvest and sonar counts as primary indicators of run strength. Without complete and reliable data across user groups, implementing further restrictions undermines both resource management, the Board's actions in 2024, and local economies.

The economic consequences of lost fishing time are significant. In 2024, the Copper River gillnet fishery generated an estimated \$12 million in ex-vessel value. Removing one week of fishing could reduce direct earnings by \$1–2 million, with total impacts of \$4–6 million when including processing, wages, and local spending. We took that hit on our economy in 2025, from the conservation efforts implemented at the 2024 Board of Fish. Another 1-4 weeks of lost opportunity could raise these losses into the tens of millions of dollars, affecting both Cordova and the State of Alaska.

The Copper River fishery is a model of sustainable management and a vital economic and cultural resource. It provides food security at home and delivers world-renowned salmon to markets across the globe. Decisions regarding the fishery must follow the best available science, the Board's established process, and respect conservation measures already in place.

For these reasons, I urge the Board to reject ACRs that would further reduce Copper River gillnet opportunity.

Sincerely,

Kasey Kinsman, Vice Mayor
Representing City of Cordova Mayor & City Council



CORDOVA DISTRICT
FISHERMEN
— UNITED —

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Operations Director + FVA

Hannah Heimbuch
Policy Director

October 13, 2025

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

Re: Agenda Change Requests for the 2025–2026 Meeting Cycle

Chair Carlson-Van Dort and Members of the Board of Fisheries:

Cordova District Fishermen United (CDFU) is an industry-based nonprofit dedicated to supporting commercial fishing in the Prince William Sound (PWS) region by advocating for the needs of community-based fishermen, and the resources they depend upon. We appreciate the opportunity to comment on the Agenda Change Requests (ACRs) before the Board for the 2025–2026 meeting cycle.

We are commenting specifically on ACRs 1–4 and 8. After careful review, we strongly believe that none meet the established criteria for consideration out of the regular Board cycle.

Our position is rooted in the public process conducted through the 2024 Prince William Sound/Upper Copper River Finfish meeting, which addressed these very issues less than a year ago. The Board deliberated extensively on strategies to improve Copper River King salmon escapement, engaging a wide range of stakeholders through standard process. The result was a suite of significant changes designed to promote precautionary conservation of Copper River King salmon. They focused on deeply impactful restrictions to the commercial salmon fleet—restrictions that were implemented for the first time in the 2025 season.

Given that these measures were recently enacted through the regular meeting cycle, and no new information has emerged, we see no justification for reopening the same topic out-of-cycle.

Primary Position 1: ACRs 1–4 Do Not Meet the Criteria for an Agenda Change

Criterion 1: Conservation Purpose — Not Met

Strategies for Copper River King salmon conservation were comprehensively evaluated during the 2024 regular meeting. The Board adopted new regulations focused on substantial commercial restrictions, and the 2025 season represented the first application of those new guidelines. There have been no unforeseen events or new information that would justify additional or different management action. Current management is following the conservation framework established by the Board less than a year ago through public process.

In recent years, chronic low water levels in the Copper River have compounded operational challenges for the Native Village of Eyak's mark-recapture project, undermining the reliability of this long-used method for estimating king salmon escapement. As ADF&G staff noted in their staff comments on these ACRs, the project "suffered challenging operational issues resulting in reduced reliability," with 2024 estimates showing wide confidence intervals and significant disparity from sonar-based results.

These difficulties stem from the physical constraints of conducting mark-recapture work in shallow, shifting river channels where effective netting and tagging become increasingly unfeasible under persistent low-water conditions.

In terms of how this helps us assess for a conservation concern, it is critical to note that these challenges almost certainly resulted in underestimating king salmon escapement.

In contrast, the Miles Lake Sonar Project has continued to produce consistent and verifiable abundance estimates that more accurately reflect total passage, and appropriately indicate greater confidence in escapement. This situation underscores the importance of maintaining adaptable management strategies that rely on the most dependable and scientifically sound tools available, rather than reacting to short-term data limitations or uncertainty inherent to field conditions.

Criterion 2: Correction of a Regulatory Error — Not Met

The existing management plan reflects the Board's direction and was crafted precisely through its formal regulatory process. No regulatory errors have been identified in the plan or its implementation. In-season management actions have remained consistent with the regulations adopted by the Board.

Criterion 3: Correction of an Unforeseen Regulatory Effect — Not Met

Some ACRs characterize in-season management decisions as evidence of unforeseen regulatory effects. This interpretation is inaccurate. The discretion exercised by ADF&G managers in-season is a direct and intentional feature of the very recently assessed

management plan—explicitly designed to allow for adaptive response within a complex mixed-stock fishery, *and* directly reflective of the Board’s recently established guidelines around king conservation. The suggestion that an intentionally developed management strategy constitutes “an unforeseen effect” is inconsistent with the intent of the ACR criteria and the nature of the regulation, and would only serve to hinder the Department’s ability to effectively meet the Board’s conservation and management objectives.

Allocative Nature of the ACRs

ACRs 1–4 focus primarily on restricting the commercial fishing sector and are therefore allocative in nature. Several assert a perceived imbalance in fishing opportunity among user groups under current conservation restrictions. However, all user groups experienced conservation-driven limitations during the 2025 season. The commercial fleet, in particular, experienced significant reductions in both time and area to prioritize King salmon conservation. Given the many ongoing strategies already supporting the recovery and monitoring of Copper River Kings, additional consideration of new restrictions targeting the commercial fleet alone is clearly allocative and does not meet the intent or threshold for an agenda change.

Primary Position 2: ACR 8 Does Not Meet the Criteria for an Agenda Change

CDFU opposes ACR 8, as it fails to meet the criteria for consideration out of cycle. Equally important, it has the potential to *create* issues around both allocation and conservation.

Entirely Allocative in Nature

The proposal seeks to close a longstanding, traditional commercial fishery that has supported local, resident fishermen from Yakutat and Cordova for nearly a century. If adopted, the proposal would effectively reallocate the entire resource to nonresident, out-of-state sport fishermen—who already achieve daily bag limits with limited effort. Such an outcome would represent an inequitable and unnecessary reallocation of a shared public resource, not a conservation action.

Inaccurate Claims Regarding Habitat Changes & Conservation Concerns

The proposal cites a “storm surge” as the cause of the recent confluence of two rivers, a claim that is factually incorrect. Satellite imagery and long-term local observation clearly demonstrate that these river systems have been gradually merging over the past decade, with full connection occurring in spring 2024. Since that natural confluence, two commercial fishing seasons have been conducted without incident, and the Tsiu River has met or exceeded its upper escapement goals in both years. Similarly, no unforeseen regulatory impact or error has been identified, nor do we believe there are any at this time.

Over-Escapement Is the Primary Concern, Not Commercial Harvest

The only legitimate conservation concern in this system is the potential for chronic

over-escapement. The Tsiu River has met or exceeded its escapement goals every year since 1973. Over the last decade, fewer than five permits have typically participated in this fishery, and weather conditions often limit openings to only a few per season. Consequently, recent harvest levels have been a fraction of historic norms. The limited and intermittent commercial harvest is, in fact, a critical management tool for ADF&G to prevent over-escapement and maintain long-term system health. Removing that management capability would compromise the Department's ability to sustain this delicate system over time. Taking up this proposal is far more likely to *cause* a conservation concern, than to correct one.

Conclusion

CDFU respectfully urges the Board of Fisheries to reject ACRs 1–4 and 8 on the basis that they do not meet the criteria for consideration out of cycle. The issues they raise have been recently and comprehensively addressed through proper public process, and reopening them would undermine the stability, predictability, and fairness of the Board's established regulatory cycle.

Our members remain committed to supporting effective conservation and responsible management of the Copper River and Yakutat-area salmon fisheries. We appreciate the Board's ongoing attention to these important matters and its commitment to transparent and science-based governance that honors the perspectives of Alaska's fishing communities.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Hand". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Hand".

Michael Hand, *Board President*
Cordova District Fishermen United

Submitted by: Andy Couch

Community of Residence: Eagle River

I support Agenda Change Requests(ACRs) 1 - 6 and believe there is a conservation reason for each. Conservation reason for ACRs 1 - 4 is specifically for Copper River king salmon -- especially in light of ADF&G's reduction of May/June sonar objectives following the December 2024 BOF meeting. Conservation reason for ACRs 5 & 6 is for Little Susitna River and Deshka River coho salmon. The board considered several proposals seeking to provide additional sport and / or commercial salmon harvest opportunity in the Northern District or Northern Cook Inlet sport fish Management Area of Upper Cook Inlet, and aside from a change in one small sport fishery (Fish Creek) denied all other proposals that would have allowed more liberal coho or sockeye fishing opportunity in the Northern portions of Upper Cook Inlet. However, the board adopted regulation changes to more conservatively manage late-run Kenai River king salmon, that had serious impacts on Northern Cook Inlet salmon stocks, and in particular Little Susitna River and Deshka River coho salmon. While it was understood that harvesting the vast abundance of Upper Cook Inlet salmon stocks with the drift gillnet fishery could have consequences on Northern bound salmon stocks, I heard no Board of Fisheries (BOF) member that it the impact might be so great as to likely cause both Little Susitna River and Deshka River coho salmon stocks to be listed as Stocks of Management Concern at the next Upper Cook Inlet BOF meeting. With one more year of management similar to the past three years, that is where we appear to be headed. While if adopted ACR #5 might still not be conservative enough to ensure that Little Susitna River and Deshka River coho salmon stocks would make their coho salmon spawning escapement goals in 2026, it would be a step in the right direction, and the drift gillnet fishery would still be allowed to fish extensively in the Expanded Kenai and Expanded Kasilof Sections where large abundance of sockeye were harvested during 2025. It would also allow more limited drift gillnet fishing in Drift Gillnet Areas 1 and 2 (during years with sockeye returns larger than 2.3 million sockeye to the Kenai River). For a more detailed explanation specifically on ACR #5 please SEE ATTACHED.

Mat-Su Anglers Column for October 3, 2025 Frontiersman Newspaper

Juneau, We Have **PROBLEMS**

By Andy Couch

From 5 AAC 21.353 Central District Drift Gillnet Fishery Management Plan: (a) the purpose of this management plan is to provide adequate escapement and a harvestable surplus of salmon to the Northern District Drainages (of Upper Cook Inlet) and to provide management guidelines to the department. . . . — Bracketed language added. <https://www.law.cornell.edu/regulations/alaska/5-AAC-21.353>

Problem #1. When more than 2.3 million sockeye salmon are returning to the Kenai River, the amount of drift gillnetting allowed under the drift gillnet plan is too great (without management reduction) to achieve the plan's purpose of, ". . . to provide adequate escapement and harvestable surplus of salmon to the Northern District . . .," as stated in the first sentence / continued through the paragraph. After three consecutive years where the Alaska Department of Fish and Game (ADF&G) has attempted to harvest large harvestable surpluses of Kenai River sockeye salmon (under this plan), but failed to attain the two largest sustainable escapement goals (SEGs) for coho salmon in Upper Cook Inlet, this problem is obvious and well documented — and has a much longer history.

Article 8 Section 4 of the Alaska State Constitution states, *"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."*

Certainly both Deshka River coho salmon and Little Susitna River coho salmon easily qualify as "replenishable resources belonging to the State," and therefore require maintenance on the sustained yield principle as mentioned in Article 8 Section 4. The State Constitution, however, provides few guidelines as to how sustained yield, "subject to preferences among beneficial uses," should be interpreted. For example: Alaskans who primarily harvest salmon from Northern Cook Inlet waters / drainages may interpret that phrase to mean that providing enough salmon escapement to meet all Northern Cook Inlet SEGs and to provide conservative inriver salmon harvest opportunities throughout the season uninterrupted by inseason restrictions or closures should be the preferred beneficial use. This interpretation would be supported by the purpose language in the first sentence / paragraph of the drift gillnet plan 5 AAC 21.353.

Other Alaskans and current ADF&G fishery management appear to interpret, "subject to preferences among beneficial uses," as meaning large Upper Cook Inlet commercial sockeye harvests are the preferred beneficial use — even over providing for department set coho salmon SEGs, and far above providing conservative and reasonable coho salmon harvest opportunities for Northern Cook Inlet inriver salmon users. I know of no language in any Upper Cook Inlet salmon management plan

prioritizing salmon harvests over meeting minimum salmon SEG levels, and request that ADF&G please provide such language for public examination — is there any?

Problem #2 While the department regularly produces reports and press releases detailing how many Alaska salmon have been harvested by the commercial industry, it often does not mention spawning escapement shortages or other management problems that should be addressed. Case in point being the failure to attain Deshka River and Little Susitna River coho salmon SEGs for 3 consecutive years.

One additional year without addressing excessive commercial harvests of northern bound coho salmon in the Central District drift gillnet fishery, and at a minimum both Deshka River and Little Susitna River coho salmon will likely reach the status of Stock of Management Concern as identified in 5 AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries (d)(1)(D)(2) and (f)(21). If this occurred for either Deshka River coho or Little Susitna River coho it could be the first designation for a coho salmon Stock of Concern in the State of Alaska. If the designation was applied to both Deshka River and Little Susitna River coho salmon stocks it would mean that the coho salmon stocks with the two largest SEGs in all of Upper Cook Inlet could both be designated as Stocks of Management Concern during the same Board of Fisheries (BOF) cycle. What would be the consequences of double coho salmon Stock of Management Concern designations in Upper Cook Inlet?

At the 2024 Upper Cook Inlet BOF meeting, after late-run Kenai River Chinook salmon had been designated a Stock of Management Concern, regulation was developed that closed the Central District Eastside set net fishery (allowing only the use of dipnet by permit holders) until adequate Kenai River Chinook salmon escapement could be projected. This resulted in an expanding drift gillnet fishery 2 miles and further from the Kenai Peninsula coastline that took, not only a larger portion of harvestable surplus Kenai River sockeye salmon, but also harvested a significantly larger portion of northern bound salmon stocks, and in particular, coho salmon.

Therefore, it appears likely that coho salmon Stock of Management Concern designations for the two coho salmon stocks with the largest SEGs in all of Upper Cook Inlet could likely have serious salmon harvest reduction implications for the commercial user group that now takes most of the northern bound Upper Cook Inlet coho salmon harvest — specifically the drift gillnet fleet. I am NOT advocating that the drift gillnet fleet be restricted to using dip nets and releasing all coho salmon unharmed, however, I am advocating for a reduction in drift gillnet harvest of northern bound salmon stocks — sufficient to meet the purpose statement found in the Central District Drift Gillnet Fishery Management Plan.

While it is understandable that this administration / ADF&G may want to kick this issue down the road for the next governor and political appointments to deal with, I believe it much more appropriate for our current governor and his administration to step up to the plate, and at very least, acknowledge there is a problem with management of Deshka River and Little Susitna River coho salmon stocks that does not measure up to

the purpose statement of the Central District Drift Gillnet Fishery Management Plan. It should be further acknowledged that if that problem is not addressed, within one year, there is high likelihood for Alaska's first two coho salmon Stock of Management Concern designations.

Acknowledgement of this issue should also recognize that there definitely is a very real and pressing conservation purpose or reason identified in 2025 Agenda Change Requests (ACRs) #5 and #6. <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/ws/adfg-staff-comments.pdf>

Juneau, we definitely have problems. This is a request for your appropriate response.

Fish On,

Andy Couch is a member of the Matanuska-Susitna Borough Fish and Wildlife Commission and the Matanuska Valley Fish and Game Advisory Committee, however comments expressed in this column are his own unless noted otherwise.

Submitted by: Raven Cunningham

Community of Residence: Eagle River

ACR 1: OPPOSE

ACR 1 does not meet any of the criteria for consideration and should be rejected. The proponent's argument is based on the idea that "estimating means available" suggest we may have reached the lower end of the escapement goal. That alone does not establish a conservation concern, only a failure to meet the lower bound would. There is no actual data, abundance estimate, or 2025 Copper River Chinook run estimate to back this up. Without a real conservation issue, this does not meet the criteria.

The proposal also does not address any unforeseen effect on a fishery when the regulation was adopted, nor does it identify which fisheries are even being affected. ACR 1 fails to meet the criteria for approval and should be rejected.

ACR 2: OPPOSE

ACR 2 also fails to meet the criteria and should be rejected. The proponent references conservation concerns based on upriver restrictions, but shared burden of conservation is not, in itself, a valid conservation purpose. Conservation must be tied to a specific stock, and no such data is provided here.

The proposal also claims to address unforeseen effects but doesn't clearly identify any. It points to the fact that Chinook restrictions occurred upriver while ocean fisheries remained open. But Chinook move from the ocean to the river over several weeks, so conservation measures must focus on where the fish actually are. By the time the inside area opened, Chinook were already upriver. This does not demonstrate any true unforeseen effect, so it fails this criterion.

ACR 3: OPPOSE

ACR 3 should also be rejected because it doesn't meet the criteria for consideration.^[1]^[SEP] The proponent claims a conservation concern by saying it "appears likely" the 2025 escapement won't meet the goal, but no escapement data exists yet. Speculation is not evidence of a conservation problem.

It also fails to show any unforeseen effect. The proposal mischaracterizes how the department manages Chinook, suggesting overharvest where none has been documented. The reference to inseason emergency orders is also inaccurate, these are standard management tools, not unforeseen events.

ACR 4: OPPOSE

ACR 4 misunderstands how Sockeye and Chinook are managed on the Copper River. Sockeye management uses inseason sonar data at Miles Lake, while Chinook relies on post-season mark-recapture at Baird Canyon and Canyon Creek. The proponent claims data indicates failure to meet escapement goals, but no such data has been released to the public.

The request to switch to an OEG doesn't identify a specific goal or fishery. It doesn't demonstrate a new conservation purpose, regulatory error, or unforeseen consequence. Sonar objectives and escapement goals are not the same thing, and claiming otherwise is incorrect. There's also no evidence of a failed SEG or major impact to user groups. ACR 4 does not meet any criteria for approval and should be rejected.

ACR 8: OPPOSE

ACR 8 raises concerns about river realignment at the Tsiu and Kaliakh, claiming it's leading to increased interception of Tsiu-bound coho by the Kaliakh fishery. But these systems have always had mixed-stock harvest, and management plans already account for this. The physical change may be dramatic, but biologically it is not significant.

The change actually makes setnetting safer, which seems to be the real reason behind the push for closure. If any adjustments are needed, they should come through the regular cycle with broad user input, not through an ACR.

The proposal doesn't establish a conservation need, there's no evidence of reduced escapement or sport harvest on the Tsiu. It also doesn't identify a true unforeseen effect. ACR 8 fails to meet the criteria and should be rejected.

PC11

Submitted by: Gregory Gabriel

Community of Residence: Eagle River

Board Members:

ACR 9 was submitted by the Jig Association to curb illegal landings of longline and pot caught pacific cod as jig landings. In reading ADFG's comments, it appears that the department failed to consider the incorporation of slinky pots since the 500 hook limit was put into place. Slinky pots are a new development and are easily transported and fished, being particularly effective at catching cod.

Unfortunately, there are fishermen who seem to be utilizing longline and slinky pots and making landings as jig caught fish, stealing GHL from lawful participants.

My recommendation would be to retain the 500 hook limit, and prohibit possession of slinky pots and longline (reels or tub) gear onboard a vessel engaged in jig or troll fishing for pacific cod.

Thank you for your consideration of this matter.

Greg Gabriel

F/V Miss Michelle

To the Alaska Board of Fisheries:

After reviewing Agenda Change Requests (ACRs) 1 through 4 and 8, I am not in support of these proposals. In my view, they do not meet the criteria necessary for an ACR under Board policy.

In both 2024 and 2025, the Copper River met its escapement goals for both King and Sockeye Salmon. These assessments were determined using the ARIS sonar system, which the Alaska Department of Fish and Game (ADFG) has stated provides more accurate and reliable data than the NVE mark-recapture program. It also uses a larger king size as for the number which indicates it is a more conservative estimate than the NVE mark recapture program.

During the 2024 Board of Fisheries cycle, the commercial fleet lost a full week of fishing opportunity—a time period that has historically accounted for 30–40% of the total King Salmon harvest. Additional restrictions were imposed locally by ADFG staff to further reduce King harvest. The Copper River achieved an inriver count of approximately 29,000 Kings, demonstrating that the current management actions were effective.

Given these results, it would be prudent to allow the recently adopted regulations to run their course over the next three-year management cycle before considering further changes. There is no evidence of a biological concern for Copper River Kings at this time, and imposing additional restrictions on the commercial fleet could lead to over-escapement of Sockeye, which would create its own management and sustainability issues.

These ACRs appear to be allocative in nature and represent an attempt to reallocate harvest opportunity at the expense of the Cordova community and commercial fleet. If there is a sincere concern for King Salmon conservation, then stewardship measures should be applied consistently across all user groups. Potential measures could include prohibiting the use of monofilament nets in the personal use fishery for released Kings and requiring live boxes on all fish wheels operating in the Copper River.

Every King Salmon harvested in the Lower Copper commercial and subsistence fisheries are fully utilized, whereas some inriver fisheries result in mortalities that prevent Kings from reaching their spawning grounds. Effective conservation requires shared responsibility, not disproportionate restrictions on one user group.

Respectfully,
Darin Gilman
Cordova, Alaska

Representative Rebecca Himschoot

Angoon, Craig, Edna Bay, Elfin Cove, Hollis, Hoonah, Hydaburg, Kake, Kasaan, Klawock, Kupreanof, Naukati, Pelican, Petersburg, Port Alexander, Point Baker, Port Protection, Sitka, Tenakee Springs, Thorne Bay & Yakutat

Session

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October 13, 2025

Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

RE: Support for Sitka Advisory Committee Proposal Regarding Unguided Rental Sportfishing Vessels

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am writing in support of the Sitka Fish and Game Advisory Committee's proposal addressing the growing issue of unguided rental sportfishing vessels. This proposal represents the type of local, community-driven problem solving that Alaska's fishery management system is built on.

In Sitka and across Southeast Alaska, residents and visitors alike depend on healthy, accessible fisheries. The last few years have seen a sharp increase in "bareboat charter" or "rental" operations – boats that function much like guided charters but operate without a guide. This classification gives nonresident anglers higher daily bag and size limits, creating both an enforcement challenge and an inequity for guided operators who follow stricter rules and resident subsistence and sport anglers who depend on nearshore access.

This proposal from the Sitka Advisory Committee (AC) to define and register these rental vessels, require logbook reporting, and align harvest limits with guided anglers is a reasonable and necessary step. These changes would improve data accuracy, close a known regulatory loophole, and protect local resources for residents and small businesses that rely on fair access to halibut and other sport fisheries.

Only one section of the proposal addresses halibut management by requesting that the state engage with the North Pacific Fisheries Management Council (NPFMC) on this federal issue. The other sections of the proposal clearly outline necessary actions to begin to accurately monitor this sector of sportfishing. It is disappointing that another year of data collection could be lost due to the Board's refusal to consider this proposal. I recognize that the management of halibut is a federal issue; however, understanding the impact of bareboat charters is critical to informing the science that guides decisions at both the state and federal levels. Alaska's Department of Fish and Game has long been highly regarded for the agency's gold-standard scientific practices and the important role of local knowledge through Advisory Committee input. The Sitka AC's proposal to define and monitor bareboat charters would highlight both of these foundational functions of the Department.

Representative Rebecca Himschoot

Angoon, Craig, Edna Bay, Elfin Cove, Hollis, Hoonah, Hydaburg, Kake, Kasaan, Klawock, Kupreanof, Naukati, Pelican, Petersburg, Port Alexander, Point Baker, Port Protection, Sitka, Tenakee Springs, Thorne Bay & Yakutat

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I appreciate the Board's attention to this issue and urge your consideration of the Sitka AC's proposal. Thoughtful, locally informed regulation is the foundation of Alaska's fisheries success. Acting now to address the unguided rental vessel gap will help preserve that tradition for the next generation of guides, subsistence users, and commercial fishing families.

Thank you for your commitment to Alaska's fisheries and for considering this important local perspective.

Sincerely,

A handwritten signature in black ink, appearing to be "Rebecca Himschoot".

Representative Rebecca Himschoot
Alaska State Legislature

Submitted by: Tim Hokanson

Community of Residence: Eagle River

My name is Timothy Hokanson and my family and I live in Cordova. I recently bought an Area E drift permit and am writing in opposition to ACRs 1-4 regarding the Copper River. I have fished two full seasons on the Copper, 2024 and 2025. It is obvious that these proposals would drastically reallocate fish to the upriver user groups. It is obvious because as soon as the sonar would count an abundance of fish in our absence, if we were either closed til June 1 or could only fish outside of our normal fishing areas, the Personal Use bag limits would go up. This is directly against the Management Plan that I bought my permit to participate under. This is wrong. If there's not an abundance of fish, we already get closed in any number of ways. Also,

I see that ADFnG has had a difficult time counting kings under the NVE fishwheel project as it has produced unreliable data. Their counts have been inaccurately low and the Board made drastic irreversible changes to our season by starting a week later because of this. I'm sure you are aware that the department is just beginning to have accurate chinook counts from the Aris sonar. 2024 was around 30k and 2025 was around 28k. Seeme to me that if you still have conservation concerns they are not from the commercial fleet's end of the fishery. So please dismiss ACRs 1-4 and relieve some of the undue stress and fear we are feeling in Cordova and other fishing communities around the state.

I bought into this fishery to get commercial access to these fish because they have a great track record of good returns, and good opportunity to harvest and most importantly I bought into this fishery because it is protected by laws and regulation. We harvest fish off the top AFTER escapement for spawning and other user groups are met. Everything is outlined by regulation for the conservation of our stocks, and the data show our escapement is within these objectives set forth in the management plan. I trust your good and moral senses will uphold the laws and regulations that protect my livelihood as there are no conservation concerns at this time.

We might all say there are conservation concerns with this resource or that resource in our state because no renewable resource is static in a changing world. But again according to the management plan, and the commercial fishery being prosecuted, the data shows fish are returning in accordance to the numbers and objectives set forth. Any actions on ACRs 1-4 are not warranted due to no conservation concerns and they are absolutely allocative in nature.

Sincerely,

Timothy Hokanson

Submitted by: Michael Kramer
TKA Ventures LLC

Community of Residence: Eagle River

I support BOF ACR's 1,2,and 3.

Under the criteria, each of these proposals share the same conservation concern:: A long term chronic decline in Copper River Chinook culminating in failing to meet sustainable escapement in 3 of the last 6 years with 2025 remaining doubtful.

At the in cycle meeting in 2024 the board expressed confidence that the department would appropriately exercise its ability to restrict King harvest inside the barrier islands in light of escapement concerns.

The 2025 season showed this faith was misplaced because even though the department recognized that escapement projections were concerning enough to close the PU and Sport fishery entirely, there were enough Kings to open the inside waters for harvest from June 23 thru the remainder of the season.

At the same time managers expressed worry about meeting the minimum goal of 21,000 Chinook for the 4th time in 7 years, it opened the inside waters and allowed 604 Chinook to be harvested by the gillnet fleet between June 23-30. The department will admit that opening the inside waters increased the King harvest by at least several hundred fish and several hundred fish may mean the difference between meeting the minimum escapement goal or not.

The pressure on Commercial Fish managers to maximize Sockeye harvest caused the department to knowingly increase exploitation of a stock that it knew would not likely meet escapement.

The board cannot simply declare that closing the inside waters for the month of June to help conserve a threatened stock is allocative or that it must wait two more years to consider in cycle.

If the board allows the department to continue exercising the option to open the inside waters in June, we will continue to miss escapement goals with enhanced commercial harvest despite complete EO closures of the sport and P.U. Fisheries.

All conservation measures that limit anyone's harvest is " allocative" in the sense that someone else may possibly increase their harvest. Imposing some restrictions that may restrict commercial harvest may have the incidental effect of allowing some PU or sport harvest, but helping put enough fish in to the river so that some upriver harvest may possibly occur cannot be considered "allocative"

It is not "allocative" if the upriver users currently have access to no fish.

The department, to its credit did keep the fleet outside the Chinook Salmon closure until June 23 this year, but then they let them in and harvested an extra 604 Kings in the next 7 days that may have been needed to meet the minimum sustainable escapement goal.

The board will not know how many Chinook escaped to spawn this year until after it votes whether to her these ACR;s. That escapement figure, whatever is turns out to be will be wildly inaccurate.

iAccording to the department's comments on these ACR's:

"In 2024, the sonar apportionment estimate was 30,728 king salmon, compared to a mark–recapture estimate of 21,069, with a 95% confidence interval ranging from 9,340 to 32,797 fish. The 2025 mark–recapture estimate is expected to be similarly low and uncertain."

So there may have only been 11,728 Chinook in 2024 and this years actual escapement , even if NVE guesses that it exceeds 21,000, could be the same or worse.

Simply extending the time period of required closures within the "Chinook salmon inside closure area while continuing to provide ample opportunity to harvest both Sockeye and Chinook outside the closed area is necessary to help meet future escapement goals.

The department showed in 2025 that it will allow additional Chinook harvest by the commercial fleet even after upriver uses have been eliminated and there is grave concern about escapement and no confidence in the method by which that escapement is predicted.

These are purely conservation proposals that should be discussed by. the Board this winter,

PC16

Submitted by: Jason R Lee

Community of Residence: Eagle River

As an area E commercial fisherman I am writing in opposition to ACRs 1-4. According to Aris data on chinook for 24 and 25, escapement numbers have been met in accordance with objectives in the management plan. This clearly shows there are no conservation concerns within the fishery that ACRs 1-4 target. Again the numbers clearly answer this.

These ACRs do not address any whole scale, or complete system wide picture encompassing the many user groups making it entirely ALLOCATIVE!

These ACRs were written when the department was/is in flux and is changing/adapting its enumeration methodology. The answer to whether we have conservation concerns appears to only be coming to light now. According to the Department's comments, the NVE fishwheel enumeration project had 'operational issues, the Department is more confident in the sonar-based estimate than the mark-recapture-based estimate.' -see staff comments. With accurate ARIS escapement numbers just now becoming available, we have a CONFIDENT chinook salmon SEG number for the FIRST TIME in years. In your consideration of these ACRs I urge you to make your decisions without subjective arguments, but in accordance with our MANAGEMENT PLAN and its objectives. Again, for anyone not aware, the NVE enumeration method has failed to supply an estimation with any confidence for 2024 and 2025. As of this fall, 2024's estimation IS NOW being documented at 30,728 chinook and

2025's estimation being between 28 and 29k chinook (ARIS). These estimations are within the outlined objectives in the MANAGEMENT PLAN therefore negating the authors arguments.

These ACRs also come at a time when unprecedented restrictions have ALREADY been enacted on the commercial user group (BOF 24). As an area E commercial fisherman they do not address any whole scale or complete system wide analysis, it is therefore highly allocative!

A look at the historical run timing of copper river salmon shows there is great variability from year to year. Making further BLANKET REGULATIONS restricting our ACCESS to this resource until only after a certain date highly allocative. Area biologist Jeremy Botz has all the tools necessary to restrict or allow harvest of salmon stocks based on abundance (ARIS). Any notion of 'systemic overharvest of early stocks' is preying on any individual who is unaware of the scientific data held within the department, regarding copper river salmon stocks and is contributing to an environment that is increasingly hostile, and seeks merely to take from one user group and give to another. The peak of 'early season' salmon abundance in the Commercial Copper River District (which often occurs during the latter part of May) is the result of several primary components of the run converging (ie Tazlina, Klutina, Chitina, Gulkana, Upper Copper). There is also a history of the commercial fleet being extremely restricted and greater details of these restrictions as well as our catch history and accompanying returns may be best suited for another discussion as I urge the Board to focus on the data (which has been UPDATED since both the 2024 BOF meeting and the time when these ACRs were written) with RESPECT to our Management Plan and its OBJECTIVES.

In summary, it is vital to protect our access to these salmon stocks and allow Area Biologist Jeremy Botz to remain flexible to achieve the goals set forth in the Management Plan. It is important to note that it has been very CHALLENGING to manage this chinook stock with the NVE method that has proven to have both low confidence and be very late in providing data. We appear to be entering a NEW AGE of accurate and in-season chinook enumeration such as we have never before had. I believe the department's job will become much easier in 2026 and beyond to achieve the objectives laid out in the Management Plan. We are FINALLY on the cusp of accurate in season enumeration and all the regulatory tools are already in place to adaptively manage this stock and meet escapement goals, thus, if the commercial fleet gets closed, we will know exactly WHY we get closed. Knowing that we are closed opener to opener based on low abundance is one thing, knowing we are closed until June 1 because another user group succeeded in re-allocating our fish in another.

Sincerely, Jason R Lee

PC16

Submitted by: Jason Lee

Community of Residence: Eagle River

My name is Jason Lee and I am writing as a commercial fisherman opposed to ACR 8. I'd like to begin my comments by addressing the 'storm surge' in the author's comments. While its true many big storms

occur every year, the Tsiu combining and becoming a tributary to the Kaliakh has been a gradual process that has occurred over time. They combined before the 2024 season. I would like to refer to an error in the department's comments where it was stated they combined in 2025. Area biologist Rick Hoffman has acknowledged the error and satellite photos are provided along with my comments. The photos show satellite imagery from both 2024 (3 of the submitted pictures) and 2025 (one submitted picture) of the Tsiu and Kaliakh bars, with dates recorded. I think it's important the board knows that two full seasons have been prosecuted in this river configuration with no conservation concerns and all user groups getting ample harvest opportunity. Using a 'storm surge' as a reason for the board to take up this highly allocative ACR is wrong.

Area Biologist Rick Hoffman has been abreast of the changing river conditions and put in 100 yard closures surrounding the confluence and we have also been limited to fishing in the 'glacially occluded waters' of the Kaliakh. So the board can be aware, these rivers flow in sand parallel to the ocean and erode and change constantly. Having hard closures such as defined in ACR 8, with no conservation concerns, could potentially take away our opportunity to fish altogether. For instance, what happens if the confluence becomes exceedingly wide? Or what if there are more than one fork in the Tsiu forming a confluence? If ACR 8 is adopted then it means potentially miles of river in the Kaliakh become closed! This unwarranted proposal could have massively unforeseen, negative impacts on our ability to participate in this fishery. Again, Area Biologist Rick Hoffman is abreast of the change and has already put in restrictions, that can be updated seasonally as the rivers will most definitely change.

The Tsiu River escapement is measured by aerial surveys, while the Kaliakh's abundance is measured by CPUE. Our commercial harvests are the only records of salmon abundance on the Kaliakh the department has. Harvest of Tsiu fish does occur in the Kaliakh commercial fishery in a way that is immeasurable. If this raises questions to any board members, I would direct them to the historical commercial harvest records showing over 30 permits fished on the Tsiu year in and year out and a robust record of participation in the Kaliakh as well, each with a history that began about one hundred years ago. Even with those levels of participation, since 1973, the department notes that every year the Tsiu was surveyed it met escapement (some bad weather prevented a few survey years). Since 2018 we have four permits fished with the 5th being my son Merrik Lee (11) who has fished 2-3 openers in August before school, so mainly just 4 permits. And this number of permits hasn't changed and likely won't change due to the fact that for fishers boating their fish to Cordova there just ISN'T more than about 4-6 fishable sites on the river TO fish. If there were more participation, area biologist Rick Hoffman, who we work closely with, would put in additional restrictions if they were warranted. Due to the remoteness and lack of specific resources (ie sonar counting for Tsiu and Kaliakh coho) exact numbers of escapement are unfeasible. The Yakutat salmon set net fisheries appear to be managed with broad strokes having built in buffers and time restrictions to ensure escapements are met, and there are SEVERAL examples where two rivers are close together and stocks are harvested as a whole, without an exact enumeration of what fish belongs to be counted from what river. But again it does come down to not having conservation concerns in either the Kaliakh or the Tsiu.

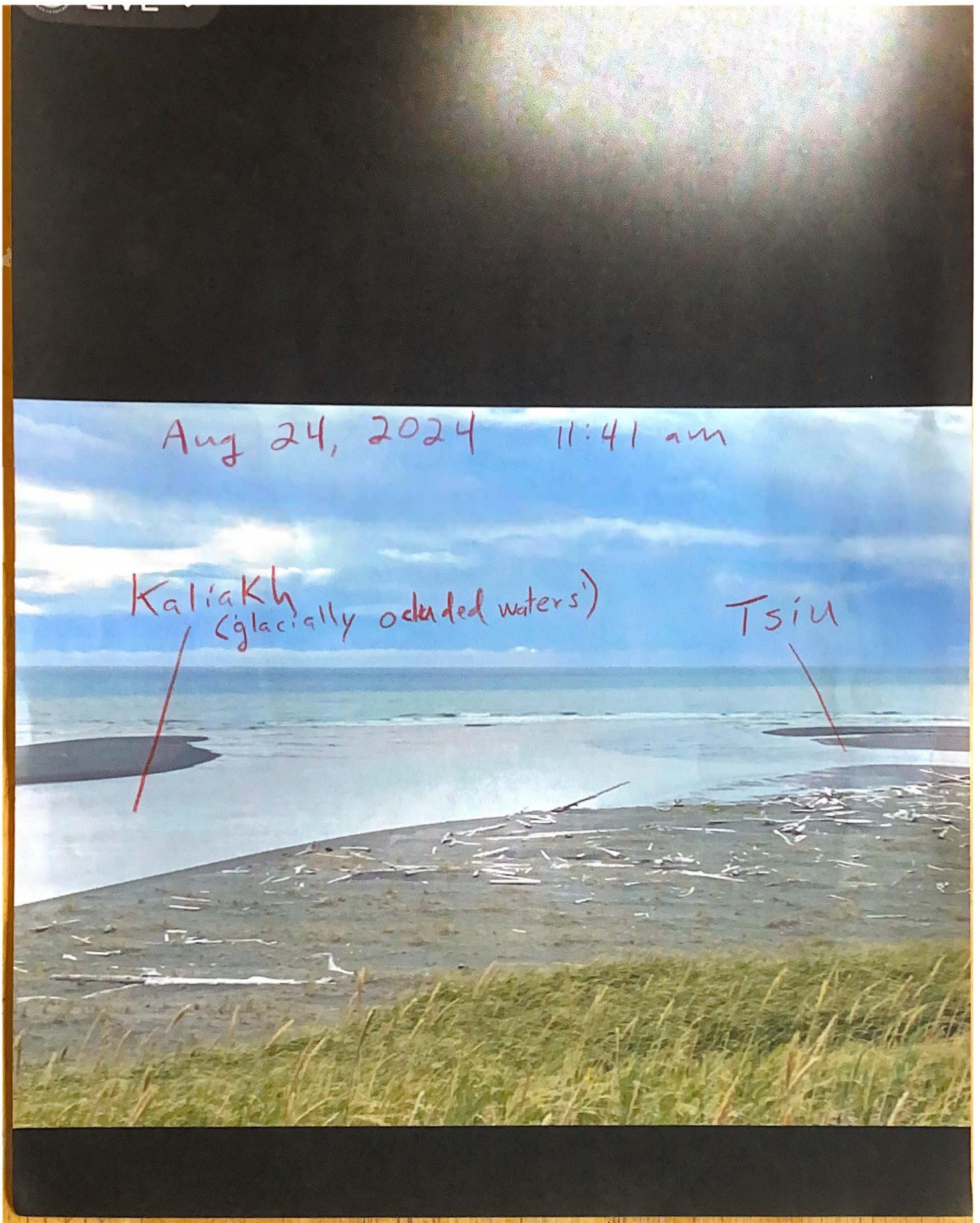
Being new to the ACR process I suspect a more detailed examination should be had at a latter time. Suffice to say this is a very complicated commercial fishery, with many logistical challenges associated to its remoteness and difficult weather/ocean conditions for us. I do think its important for the board to know in making their determination that the author is seeking to close the ONLY area of river that we are able to operate in! Since 2018, our participation has been almost entirely in this area of river where the confluence currently is, which happens to currently be the only place in the river deep enough and close enough to the ocean to get early tidal action to allow us to be able work our gear. The likelihood for a conservation concern to arise is quite low based on the fact that we are only talking about a small amount of river here. 5 AAC 30.335 identifies the minimum distance between set gillnets at 75 yards, because of this, again, there are only about 4-6 viable sites where the river is deep enough, all at the river bend (which is above and below the 2025 confluence). Compared to historical participation in both the commercial Kaliakh and Tsiu rivers, our participation since 2018 where we boat fish to Cordova processors, has not been a conservation concern.

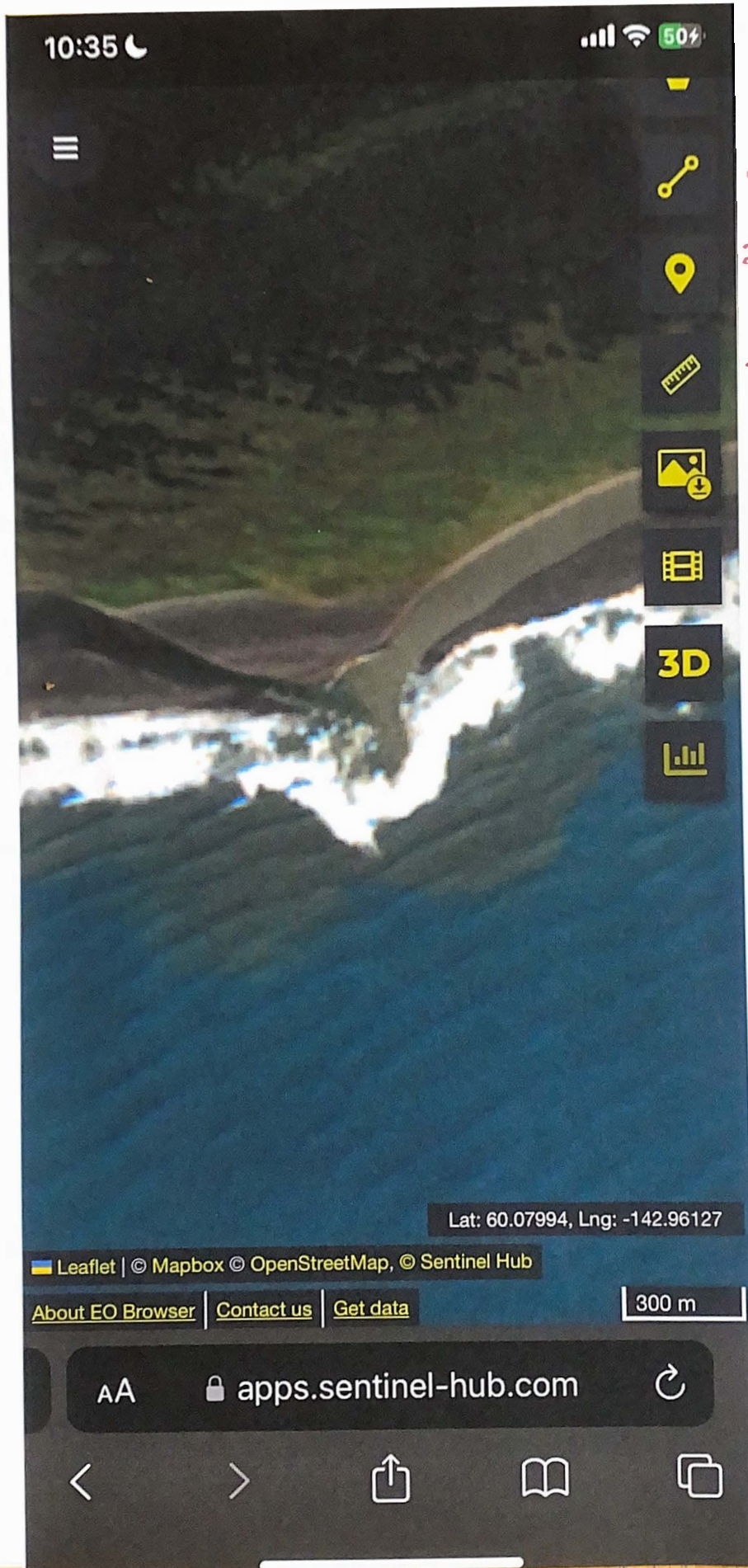
Being entirely allocative in nature, and lacking a conservation concern with Tsiu and coho stocks, taking up ACR 8 appears to be in violation of Sec. 16.05.251. Regulations of the Board of Fisheries a) 12) regulating commercial, sport, guided sport, subsistence, and personal use fishing as needed for the conservation, development and utilization of fisheries; Since 2018 we have been trying to RE-develop and utilize this fishery that has been dormant for some time. This is indeed an underutilized stock of fish with no management concerns. Again a thorough discussion of the substantial obstacles we face against Mother Nature and dealing with the remoteness of the fishery, may be best suited for another time.

Due to the unique nature of this fishery, there is not another one like it in the state, and our intentions on keeping it OPEN, I will be attending the Board of Fish Workshop and can describe in more detail the immense obstacles we face in making this fishery happen so that you can have all the information to make the right decision which is to reject ACR 8 based on no conservation concerns and it being highly allocative. I can also provide a history of satellite photos to page through that show the gradual change in the rivers over the past few years.

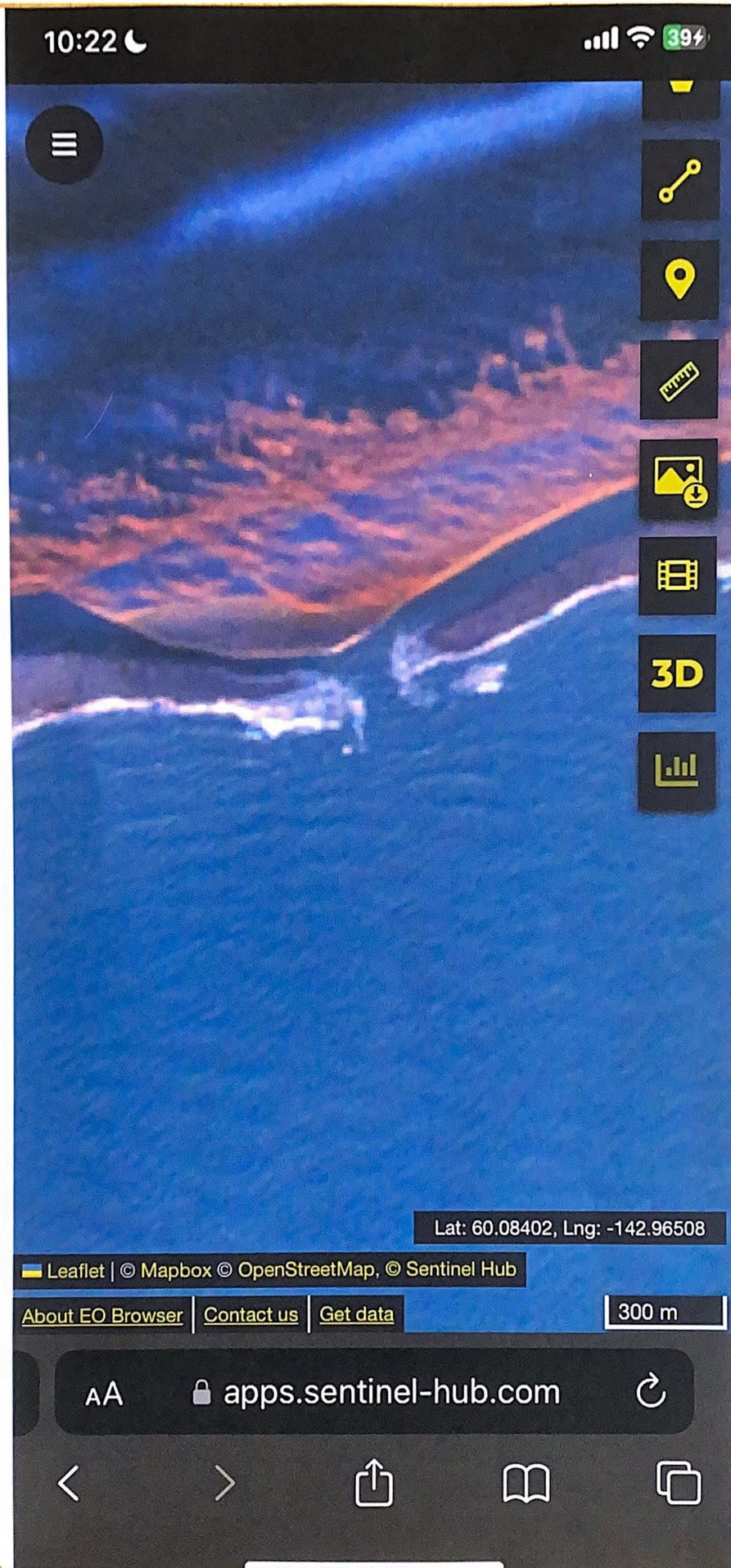
Thank you for your time and service, Jason Lee

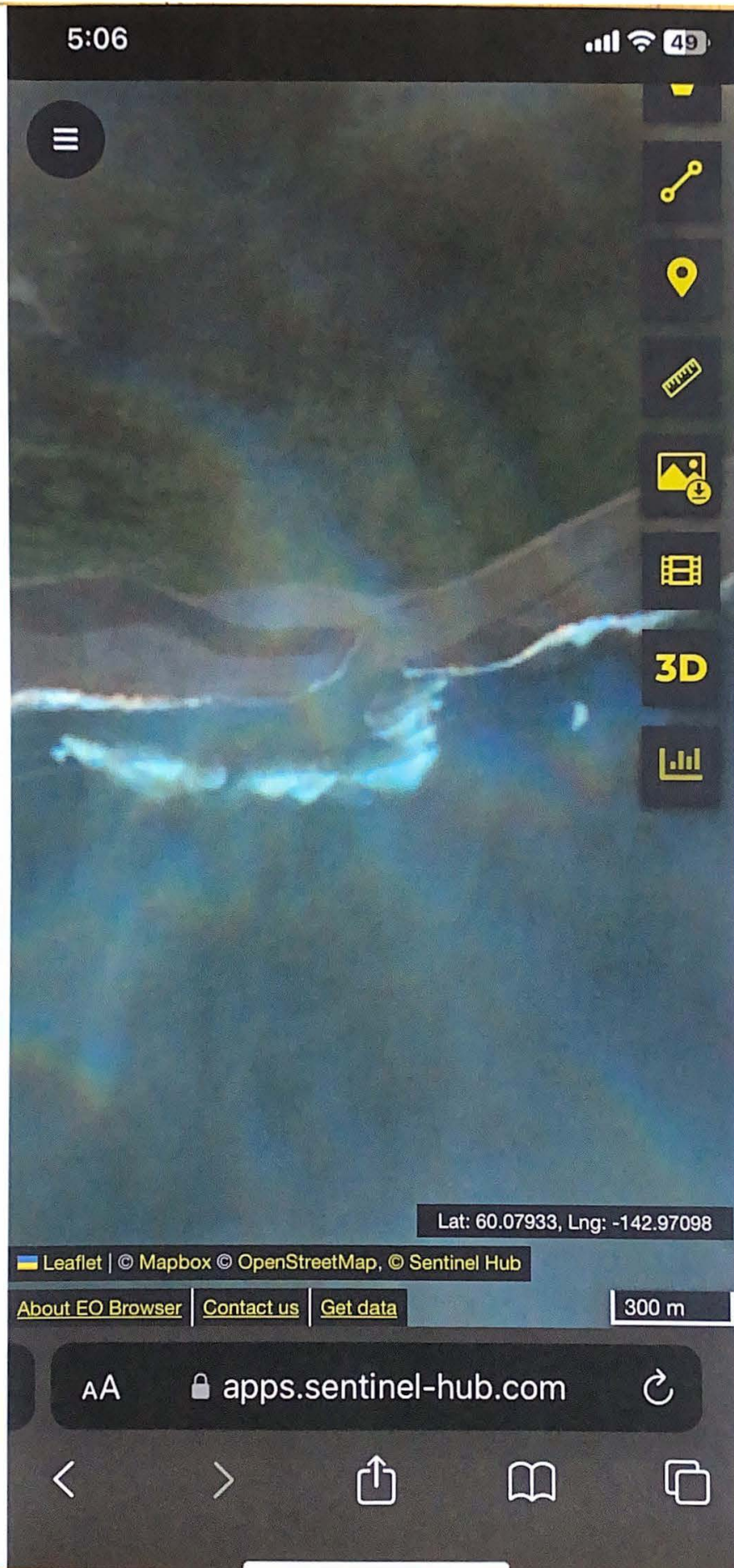
please attach these following the written comments submitted earlier





9/21/24
20:58:33
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Sentinel-
2 L2A





8/22/25
20:58:54
UTC

Submitted by: Grace Lee

Community of Residence: Eagle River

My name is Grace Lee and I am a fisher woman, fisher wife, and fisher family in our small community of Cordova, AK. As I have lived here about a decade now, I have learned a lot about fishing, from the fisherfolk to the processors to the biologists. What makes a fishery feasible and sustainable, is multifaceted. At the core of that, there is this one question: Can the product being harvested be delivered to be processed and then shipped out in a sustainable way? If that basic requirement can't be met, there is no fishery, even if there is abundance in the species. The set net fishery on the Tsiu and Khaliak rivers is a small, local fishery with only 4 vessels actively fishing at the peak, within a short season. Currently, they have to travel upwards of 18 hours to haul back fish to the nearest processor, delivering in Cordova, AK. This requires very specific timing as the stage of the tides and the bar coming out of the river can be very challenging. Let alone the other dynamics such as river currents, storms on or offshore, ocean swell, icebergs and other fishing debris (trees). Why would it be even considered to restrict and push these four fishing vessels up river where more challenges are met during active fishing as well as during transportation, when there is no biological or conservation concerns, in order to allocate more fish to the sport fishery along these rivers? Is there a current inability or lack of catch that is facing the sport fishing community in the Tsiu rivers because of four fishing vessels? No. My 11 year old son sport fishes the Tsiu any chance he gets and easily catches fish. Would taking up these ACRs without any evidence be setting a dangerous precedent that is exhausting to commercial fishing families from remote fishing communities to attend Board of Fish meetings out of cycle? Yes. It seems that "more fish for us" is the intent and not the proclaimed issues from the change of the mouth or the confluence. If this ACR was due to recent changes in the mouth of the river, then why was almost an identical proposal submitted in 2016 from the same person? It appears to me that this comes from a place of greed instead of science backed planning. The fisherman, fishing family's, processors and biologist, who's job is to manage this exact fishery and make the best calls, all agree that this ACR is not warranted and should be shut down immediately. I thank you for your time. -Grace Lee

Submitted by: Mike Mickelson

Community of Residence: Eagle River

For ACRs 1,2,3 none of the king salmon escapement data has been released for the 2025 season. Large changes have already been enacted during the 2025 season following the last in cycle meeting. Acr 4 is not necessary. ACRs 1-4 do not meet the criteria for an ACR. ACR 8 does not follow the management precedent that had already been established in this district.

Oct 10, 2025

I am writing as the Point of Contact for the Sitka Fish and Game Advisory Committee for issues concerning Unguided Rental Sportfishing Vessels. We were very disappointed to learn that once again, the Board Support Section has declined to accept a proposal we submitted (attached) concerning Unguided Rental Sportfishing Vessels, especially since this time, we submitted it at the suggestion of the Commissioner's office.

I am specifically requesting that, during their October 28-29 Work Session, the Board and their Support Staff reconsider the decision to not include our proposal to the Statewide Finfish BOF Meetings scheduled for March 2026.

After reading the email we received from Joe Felkl of the Commissioner's Staff (also attached), I felt it important to clarify a few things.

We still feel very strongly that this proposal and the Unguided Rental Fishing Vessel issue itself deserves the opportunity for the state's F&G Advisory Committees to review/hear public testimony and vote to support or oppose the proposal. Also the issue is important enough to allow a public hearing on the issue that can only be provided at a Board of Fisheries meeting.

Accordingly, we ask that the Board reconsider the decision that was made to decline acceptance of this Proposal.

Regarding the reasons in Mr. Felkl's email for not accepting our proposal due to the Board/Commissioner/Department not having the authority to regulate halibut harvest, I offer the following: Action items 1 thru 3 do not ask any entity of the state to reduce halibut harvest by the user group in question, they only ask the state to:

- 1.) define the user group in question so they can be more readily identified as a separate user group;
- 2.) encourage the department to require the user group in question to register as such (something the department already requires of charter vessels);

3.) encourage the department to start breaking out harvest data for this user group in both their ongoing dockside creel and mail out surveys.

Only in the last action item of our proposal (#4), do we ask for any actual management of halibut and that item only asks the Department to request the NPFMC to take some specific actions regarding the halibut harvest by the user group in question. This section doesn't ask any entity of the State of Alaska to take any direct action to manage halibut harvests.

Accordingly, we believe this issue is important enough to be included in the Statewide Finfish Meetings to be held in March of 2026. Only by including this proposal in the agenda will the state's ACs and the public be able to provide testimony to the Board of Fisheries on this important and growing segment of the sport fishing industry.

Sincerely,

A handwritten signature in blue ink that reads "Steven A. Ramp". The signature is fluid and cursive, with the first name "Steven" and last name "Ramp" clearly legible.

Steven A. Ramp

Resident Sportfish Seat

Sitka Fish and Game Advisory Committee

**ALASKA BOARD OF FISHERIES
Regulation Proposal Form 2024-2025**

Proposals must be received Tuesday, April 10, 2025

PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or online at:

<https://arcg.is/biqum0>

BOARD OF FISHERIES REGULATIONS			
☐ Subsistence	☐ Personal Use	☒ Sport	☐ Commercial
*Which meeting would you like to submit your proposal to? ☐ Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod ☐ Alaska Peninsula / Aleutian Island / Chignik Finfish ☐ Arctic / Yukon / Kuskokwim Finfish ☐ Bristol Bay Finfish ☒ Statewide Finfish and Supplemental Issues			
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 _____ N/A _____			
*2. What is the issue you would like the board to address and why? The Sitka Fish and Game Advisory Committee (AC) has been working for over the last four years to convince fisheries managers at both the North Pacific Fisheries Management Council (the Council), the Alaska Board of Fisheries (the Board) and the Alaska Department of Fish and Game (the Department), to take some action regarding a fairly new, large and rapidly expanding user group of Halibut harvesters, the Unguided Rental Boat/Bare Boat Charter Anglers within Halibut Management Area 2C. The issue at hand is this rapidly growing user group is taking advantage of the more generous daily Halibut bag limit of two fish of any size per day versus the more restrictive Guided Angler bag limit of one fish per day that falls within a strict "reverse slot limit". The history of our efforts on this issue includes: A. We submitted two proposals for the Board's 2020/2021 Southeast & Yakutat Finfish & Shellfish cycle of meetings and no action was taken. B. We submitted another proposal on this issue for the Board's 2024/2025 Southeast Cycle and the Board's Admin Support personnel chose to not accept the Proposal for the Board's deliberations in their Jan/Feb 2025 meetings, citing problems with the Board's authority to perform the requested actions in the proposal. C. Members of our AC submitted written comments and testified at the Council's 2022, 2023, 2024 meetings and at the 2022 and 2023 October & December meetings of the Council's Charter Halibut Committee. No action has been taken or promised on this issue. In our discussions with the Council, we have been informed that the Council is unlikely to take any action to quantify and/or reduce harvest of the Unguided Rental Vessel/Bareboat Charter user group unless they receive a request to do so from the State of Alaska.			

D. We have asked both the Department and the Council to break out harvest data for the user group in question but have been told by both that neither group has been able to come up with an acceptable definition of “Rental Vessel” in order to provide the requested data. We were also told that there are basically insurmountable challenges in breaking out the harvest data for this particular user group of anglers.

E. Within just a short two-week period in the fall of 2023, Sitka’s State House Representative’s staff was able to obtain and evaluate data from the Alaska Department of Motor Vehicles on how many vessel registrations in Alaska State House District 2 using the number of vessel registrations listing “Rental” as their primary use. Her staff’s analysis of this data shows that the number of these vessels has nearly doubled between 2001 and 2023. District 2 includes all the communities of Southeast Alaska with the exception of Ketchikan, Juneau, Haines, Skagway and Gustavus. If vessels from these communities were added, it would likely show even greater growth in the Rental Vessel sector within Federal Management Area 2C.

F. In August of last year, our AC’s Chair, Vice Chair and Resident Sportfish Seat met electronically with the Commissioner on this issue at his request. He shared his concerns with this growing user group the harm they may be causing to our Halibut resources. He shared that he is fairly limited in what he can do without an accepted definition of just what an Unguided Rental Vessel is so that harvest data can be obtained. In further discussions with the Commissioner’s Staff, they have recommended we submit a new Proposal to the next Statewide Finfish BOF cycle. As a result of this recommendation, we are submitting this Proposal.

In times of low abundance for our Halibut resources (like we are now experiencing), our AC would prefer to lower the harvest of the Unguided Rental Vessel/Bareboat Charter Sportfishing Anglers (who are primarily non-residents) rather than lowering the bag limit for the remainder of the Unguided Anglers in Area 2C (who are primarily Alaska residents). If this action is approved, but fails over a reasonable timeframe to have a meaningful impact to increase the health of our Halibut resources, then our AC would likely support a reduction in sport bag limits for all Unguided Anglers.

Our AC fully understands the challenges the Board faces when dealing with Proposals that deal with a federally managed species like Halibut. We also fully understand the difficulties in having federal managers allocate resources between Guided and Unguided Anglers whereas the State of Alaska allocates resources between Resident and Non-Resident Anglers. We are also highly confident in our concern that a serious resource removal problem exists and that it is time to engage on efforts to both quantify the Harvest by Unguided Rental Vessel/Bareboat Charter Sportfishing Anglers and to create parity in bag limits between them and Guided Anglers.

***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.)**

The Sitka Fish and Game Advisory Committee requests the Board take the following actions:

1. Require the Department to accept the following definitions in their management of sport fishing activities on the Marine Waters of Alaska:

A. Rented Sport Fishing Vessel - Means any State Registered or US Documented power-driven vessel which is leased, rented or chartered to another by the owner (or "Livery") for consideration for the purpose of sport fishing in the marine waters of Southeast Alaska. Rented Sport Fishing Vessels include both Livery Vessels and Bare Boat Charters.

B. Livery - means a person who advertises and offers a livery vessel for use by another in exchange for any type of consideration when such person does not also provide the lessee or renter with a captain, a crew, or any type of staff or personnel to operate, oversee, maintain, or manage the vessel.

C. Bareboat Charter – means an arrangement for the chartering or hiring of a ship or boat for which no crew or provisions are included as part of the agreement.

2. Encourage the Department to require any persons who own (Livery) Rented Sport Fishing Vessels to register their vessel(s) as such with the Department and to display a Department provided "Rented Sport Fishing Vessel Decal" (similar to but visibly different from the current Charter Vessel Decal)

3. Encourage the Department to amend both their dockside creel census and off-season mail out survey processes to provide a "Rented Sport Fishing Vessel" category so that the harvest data for this group can be broken out and shared with the NPFMC.

4. Enter into discussions with the NPFMC asking them to:

A) Start using the above definitions in their management of Sport Caught Halibut in Area 2C.

B) Start treating Unguided Anglers fishing from a "Rented Sport Fishing Vessel" as a separate user group when making management decisions for Sport Halibut Harvest.

C) Start requiring Unguided Anglers fishing from a "Rented Sport Fishing Vessel" to log their Halibut harvests. The person to be held responsible for submitting the catch logs shall be the person who signed the Rental/Livery/Bareboat Charter agreement.

D) Start registering Rented Sport Fishing Vessels targeting Halibut, similar to the registration requirements for Charter Vessels.

E) Require anglers sport fishing for Halibut from Rented Sport Fishing Vessels to follow the same daily bag/possession/size limits and day closures as those prescribed for Guided Anglers.

4. Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The Sitka AC has discussed this issue with the Department, the NPFMC, the SE RAC and members of several other Advisory Committees.

*Submitted By:	The Sitka Fish and Game Advisory Committee, Stacy Wayne, Chair		
	Individual or Group		
*Address	Sitka, AK		99835
	*City, State	*ZIP Code	
Home Phone	*Work Phone	*Email	
	<i>*Indicates a required field</i>		

From: Felkl, Joseph J (DFG) [REDACTED]
Sent: Wednesday, October 8, 2025 4:15 PM
To: Steve Ramp [REDACTED]
Cc: Stacey Wayne [REDACTED]
Subject: RE: Sitka AC - Unguided Rental Vessel Issue

Hi Steve and Stacey,

First, thank you for your proposal requesting that the Board of Fisheries adopt regulations addressing sport fishing vessels rentals and associated halibut harvest. The Board and ADF&G appreciate the effort and thought you and the rest of the Sitka AC put into defining this category of vessels and considering how their use may affect harvest and management.

After review by not just Board Support Section staff but legal counsel, the Commissioner, and the Board chair, it was determined that most of the requested actions fall outside of the Board's statutory authority. The proposal is directed entirely at halibut fisheries. Halibut management is under exclusive federal jurisdiction, not the jurisdiction of the Board of Fisheries. The proposal references halibut throughout and does not address salmon or other state-managed species. Even if the Board were to adopt a regulation applying guided sport fishing rules to unguided anglers on rental vessels, it would have no effect on halibut, since all charter halibut regulations are established through the National Marine Fisheries Service and the North Pacific Fishery Management Council under the federal Charter Halibut Limited Access Program.

Moreover, while the Board may adopt regulations distinguishing among commercial, sport, guided sport, subsistence, and personal use fishing as needed for conservation, development, and utilization of fisheries, and may regulate resident and nonresident sport fishermen, there is no explicit authority allowing the Board to distinguish between users based solely on whether they rent or own a boat. For these reasons, the Board cannot adopt the regulations you requested.

In our prior conversations, both the Commissioner and I indicated that neither the Board nor ADF&G have clear statutory authority and that legal analysis on existing authorities as well as a statutory change may be needed. ADF&G recommends you contact your local legislator if you are seeking a legislative fix.

That said, all proposals that were not accepted will be provided to the Board at the upcoming work session on October 28-29 and will be uploaded to the meeting page before the meeting. The Sitka AC has the option to again submit written comments or a letter to the Board requesting they reconsider the proposal. You can do so by going to the meeting page and clicking on the link to submit comments: [Meeting Information: Alaska Board of Fisheries, Alaska Department of Fish and Game](#). The deadline to submit comments is October 15.

We appreciate your engagement on this issue and your continued work to support sustainable fisheries management in Southeast Alaska.

Please let me know if any additional questions come up or feel free to give me a call to discuss further.

Cheers,

Joe Felkl

Legislative Liaison

Alaska Department of Fish & Game

907.465.6137

From: Steve Ramp [REDACTED] >
Sent: Thursday, September 25, 2025 12:54 PM
To: Felkl, Joseph J (DFG) [REDACTED] >
Cc: Stacey Wayne [REDACTED] >
Subject: RE: Sitka AC - Unguided Rental Vessel Issue

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Joe, I just went thru the Statewide Proposals in the new proposal book and was very dismayed to see that the proposal calling for (and providing) a definition for unguided rental fishing vessels (among other things) was not included in the proposal book. This is the proposal that the Commissioner recommended we submit and we did just that.

Please provide the Sitka Advisory Committee with the official reasons that our proposal was not included in the proposal book. This is the second time that the Board's support section has determined not to include our proposals on this issue.

Steve Ramp
Resident Sportfish Seat
Sitka Fish and Game Advisory Committee.

Submitted by: Diana Riedel

Community of Residence: Eagle River

Proposal 1-4

These proposals do not meet the criteria for taking an issue up out of cycle. The subject matter is squarely within the topics discussed at length during the 2024 in-cycle Board of Fish meeting held in Cordova.



Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

October 13, 2025

ADF&G Board of Fisheries

Board Support Section

P.O. Box 115526

Juneau, AK 99811-5526

RE: October Work-session Agenda Change Requests (ACRs)

Dear Märít Carlson-Van Dort, Chair and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species non-profit commercial fishing association representing our 300+ members involved in the salmon, crab, shrimp and longline fisheries mainly in Southeast Alaska, although we have members involved in the Prince William Sound drift gillnet fishery thru our vessel insurance pool.

ACR 1 – Delay opening of the Copper River District (5 AAC 24.310) – OPPOSE

ACR1 does not meet any of the criteria for acceptance of an agenda change request.

The Board of Fish acted last year to reduce time spent in the inside waters to protect King Salmon, the main reason for this proposal. The Dept has the ability to manage more conservatively than regulations and for example, in 2025, an expanded inside waters closure was implemented until the king salmon run was 96% complete.

Additionally, closed waters were expanded offshore of the barrier islands for 5 fishing periods during the historic peak of king salmon run timing. Since the proposal does not meet the criteria for an ACR and the Department is managing more conservatively than regulation, SEAFA opposes ACR1 being adopted.

ACR 2 – Close waters of the Copper River District inside the barrier islands to commercial fishing for salmon (5 AAC 24.350) – OPPOSE

ACR 2 does not meet any of the criteria for acceptance of an agenda change request and is allocative in nature. The Board of Fish changed the management plan in order to further protect the King salmon last year. The Department in 2025 implemented an expanded inside waters closure until the king salmon run was 96% complete.

Additionally, closed waters were expanded offshore of the barrier islands for 5 fishing

periods during the historic peak of king salmon run timing. As the Department is using their EO authority to manage more conservatively there is not a need to adopt ACR 2.

ACR 3 – Close waters of the Copper River District to commercial fishing for salmon inside and outside the barrier islands from May 21–June 30 (5 AAC 24.350) – **OPPOSE**
ACR 3 is very allocative in nature, the Board addressed this issue with the changes to the management plan last year and ACR 3 does not meet any of the ACR criteria. To close commercial fishing time by 1-1/2 months and additional area to outside the barrier islands is very allocative. As stated above, the Department is managing conservatively, therefore SEAFA is opposed to adoption of ACR 3.

ACR 4 – Adopt an Optimal Escapement Goal for Copper River sockeye salmon (5 AAC 24.360) – **OPPOSE**

ACR 4 to adopt an OEG is best addressed by waiting for a regularly scheduled Prince William Sound meeting. This proposal does not meet the ACR criteria, the Board met on Prince William Sound last year and considered escapement goals that needed being addressed. The sockeye salmon escapement goal has been met every year since 1980. Changing the escapement goal from a SEG to and OEG is allocative, which is acknowledged in the staff comments. Allocative proposals do not meet the criteria for ACRs and therefore SEAFA opposes adoption of ACR 4.

ACR 5 – Reduce commercial salmon fishing opportunity with drift gillnet gear in the Central District of the Cook Inlet Area (5 AAC 21.353) – **OPPOSE**

SEAFA opposes adoption of this proposal and consideration of an allocative Cook Inlet proposal out of cycle that according to staff comments does not meet the criteria for adoption of an ACR. The staff comments also point out that the current plan took in consideration of protecting coho and chinook salmon while trying to access the sockeye salmon.

ACR 8 – Close the Tsiu River and all waters within one quarter mile of the Tsiu River and Kaliakh River confluence to commercial fishing for salmon (5 AAC 30.320, 5 AAC 30.331, 5 AAC 33.350) – **OPPOSE**

ACR 8 does not meet the criteria for adoption of an ACR and is allocative in nature. There is no conservation or escapement issues. The convergence of the Tsiu and Kaliakh rivers has brought very few vessels fishing the Kaliakh river in recent year within sight of sport fishing lodge customers generating this proposal. ADF&G can mitigate management time and area as necessary to reach escapement goals. Staff comments state that the Yakataga area is a very geographically dynamic area where changes in river course occur often. The department uses emergency order authority to adjust to these changes. The merging of the Kaliakh and Tsiu Rivers **may not last** as the Kaliakh River could breach the berm and enter the ocean many miles away from the Tsiu River as it once did. ACR 8 should not be adopted for consideration.

Thank you for this opportunity to comment on agenda change request (ACR) proposals submitted for your consideration at your October work session.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen
Executive Director



UNITED FISHERMEN OF ALASKA

Mailing Address: P.O. Box 20229, Juneau AK 99802-0229

Phone: (907) 586-2820

E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

October 13, 2025

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
P.O. Box 115526
Juneau, AK 99811-5526

RE: Opposition to ACRs 1-6 & 8

Dear Chairwoman Carlson-Van Dort

United Fishermen of Alaska (UFA) is a commercial fisheries trade association representing 33 commercial fishing organizations and independent fishermen who participate in the state and federal fisheries off Alaska. UFA appreciates the opportunity to address out-of-cycle needs through Agenda Change Requests (ACR) to the Board of Fisheries (Board). While ACRs provide ADF&G staff with all necessary tools to properly manage our state's fishery resources, there are well-established criteria that ACRs must achieve in order to be adopted by the Board.

The Board's ACR policy¹ provides that:

- 1) the board will accept an agenda change request **only** [emphasis added]
 - (A) for a fishery conservation purpose or reason;
 - (B) to correct an error in a regulation; or
 - (C) to correct an effect on a fishery that was unforeseen when a regulation was adopted;
- (2) **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;** [emphasis added]

¹ Found at 5 AAC 39.999 (a)(2)

This ACR policy is clear, and UFA emphasizes that number (2) above, prohibiting predominantly allocative ACRs absent new and compelling information, is fundamental to maintaining effective and transparent management. UFA therefore takes the following positions on the following ACRs for the October 28th-29th Board of Fisheries Work Session in Anchorage:

ACR 1: Delay opening of the Copper River District (5 AAC 24.310)

(A) Does it serve a conservation purpose or reason? **No.** King Salmon management was adjusted in 2024 following lengthy discussion during the 2024 regular Board cycle. A new season start date was identified as an effective conservation measure, and this measure adopted by the Board to allow for better early season King Salmon passage upriver.

(B) Does it correct an error in regulation? **No.** The current salmon management plan does not contain errors. The Department effectively managed under the updated salmon management plan (that has been established and updated through the Board of Fisheries process) which provided proper tools that In-season Management used to manage to escapement goals, while balancing the needs of the salmon management plan.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal claims that the Department is unable to properly manage the Copper River drift fishery for King Salmon escapement and the only way to correct it is a further hard and fast change of the season start date. This proposal would in effect remove In-season Management's ability to manage with as many tools as they currently have available to them. The proposal also omits the importance of using commercial fishing catch data as a run indicator for all stocks and that In-season Management was able to implement different time and area closures to balance the needs of the fleet and those of escapement goals.

Is this proposal predominantly allocative? **Yes.** This proposal is inherently allocative in nature. By further postponing the season start date of the Copper River drift gill net fishery beyond what was adopted in the 2024 Board cycle, there will be an increase in foregone commercial harvest for the sake of other user groups upriver.

ACR 2: Close waters of the Copper River District inside the barrier islands to commercial fishing for salmon (5 AAC 24.350)

(A) Does it serve a conservation purpose or reason? **No.** King Salmon management was discussed at length during the 2024 regular Board cycle and a new season start date was adopted as a conservation measure to allow for better early season King Salmon passage upriver.

(B) Does it correct an error in regulation? **No.** The current salmon management plan does not contain errors. The Department effectively managed under the updated salmon management plan (that has been established and updated through the Board of Fisheries process) which provided proper tools that In-season Management used to manage to escapement goals, while balancing the needs of the salmon management plan.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal claims that the Department is unable to properly manage the Copper River drift fishery for King Salmon escapement and the only way to correct it is a further hard and fast change of the season start date. This proposal would in effect remove In-season Management's ability to manage with as many tools as they currently have available to them. The proposal also omits the importance of using commercial fishing catch data as a run indicator for all stocks and that In-season Management was able to implement different time and area closures to balance the needs of the fleet and those of escapement goals.

Is this proposal predominantly allocative? **Yes.** This proposal is inherently allocative in nature. By further postponing the season start date of the Copper River drift gill net fishery beyond what was adopted in the 2024 Board cycle, there will be an increase in foregone commercial harvest for the sake of other user groups upriver.

ACR 3: Close waters of the Copper River District to commercial fishing for salmon inside and outside the barrier islands from May 21–June 30 (5 AAC 24.350)

(A) Does it serve a conservation purpose or reason? **No.** King Salmon management was discussed at length during the 2024 regular Board cycle and a new season start date was adopted as a conservation measure to allow for better early season King Salmon passage upriver.

(B) Does it correct an error in regulation? **No.** The current salmon management plan does not contain errors. The Department effectively managed under the updated salmon management plan (that has been established and updated through the Board of Fisheries process) which provided proper tools that In-season Management used to manage to escapement goals, while balancing the needs of the salmon management plan.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal claims that the Department is unable to properly manage the Copper River drift fishery for King Salmon escapement and the only way to correct it is a further hard and fast change of the season start date. This proposal would in effect remove In-season Management's ability to manage with as many tools as they currently have available to them. The proposal also

omits the importance of using commercial fishing catch data as a run indicator for all stocks and that In-season Management was able to implement different time and area closures to balance the needs of the fleet and those of escapement goals.

Is this proposal predominantly allocative? **Yes.** This proposal is inherently allocative in nature. By further postponing the season start date of the Copper River drift gill net fishery beyond what was adopted in the 2024 Board cycle, there will be an increase in foregone commercial harvest for the sake of other user groups upriver.

ACR 4: Adopt an Optimal Escapement Goal for Copper River sockeye salmon (5 AAC 24.360)

(A) Does it serve a conservation purpose or reason? **No.** King Salmon management was discussed at length during the 2024 regular Board cycle and a new season start date was adopted as a conservation measure to allow for better early season King Salmon passage upriver. Basing the effectiveness of large management changes on a single season's outcomes is not responsive management.

(B) Does it correct an error in regulation? **No.** The current salmon management plan does not contain errors. The Department effectively managed under the updated salmon management plan (that has been established and updated through the Board of Fisheries process) which provided proper tools that In-season Management used to manage to escapement goals, while balancing the needs of the salmon management plan.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal claims that the Department is unable to properly manage the Copper River drift fishery for King Salmon escapement and the only way to correct it is a further hard and fast change of the season start date. This proposal would in effect remove In-season Management's ability to manage with as many tools, not more. The proposal also omits the importance of using commercial fishing catch data as a run indicator for all stocks and that In-season Management was able to implement different time and area closures to balance the needs of the fleet and those of escapement goals.

Is this proposal predominantly allocative? **Yes.** This proposal is inherently allocative in nature. By further postponing the season start date of the Copper River drift gill net fishery beyond what was adopted in the 2024 Board cycle, there will be an increase in foregone commercial harvest for the sake of other user groups upriver.

ACR 5: Reduce commercial salmon fishing opportunity with drift gillnet gear in the Central District of the Cook Inlet Area (5 AAC 21.353)

(A) Does it serve a conservation purpose or reason? **No.** This proposal looks to restrict harvest by one sector to provide more harvest opportunity for another sector.

(B) Does it correct and error in regulation? **No.** This proposal does not look to change an error in regulation, but instead proposes to completely rewrite sections of the Central District Drift Gillnet Fishery Management Plan. This type of change should be addressed as scheduled within the regular cycle.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** The Central District Drift Gillnet Fishery Management Plan already manages additional sockeye salmon harvest based on coho abundance.

Is this proposal predominantly allocative? **Yes.** This proposal would put increased constraints and limit harvest opportunity on the drift gillnet fleet in the name of conservation, with no consideration of restrictions on other user groups.

ACR 6: Establish paired restrictions for the Little Susitna River coho salmon sport fishery and Northern District commercial set gillnet fishery to conserve Little Susitna River coho salmon (5 AAC 21.358)

(A) Does it serve a conservation purpose or reason? **No.** This proposal looks to restrict harvest by one sector to provide more harvest opportunity for another sector.

(B) Does it correct and error in regulation? **No.** This proposal does not look to change an error in regulation, but instead proposes to rewrite sections of the Northern District Fishery Management Plan. This type of change should be addressed as scheduled within the regular cycle.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** The Central District Drift Gillnet Fishery Management Plan already manages additional sockeye salmon harvest based on coho abundance.

Is this proposal predominantly allocative? **Yes.** This proposal would put increased constraints and limit harvest opportunity on the drift gillnet fleet in the name of conservation, with no consideration of restrictions on other user groups.

ACR 8: Close the Tsiu River and all waters within one quarter mile of the Tsiu River and Kaliakh River confluence to commercial fishing for salmon (5 AAC 30.320, 5 AAC 30.331, 5 AAC 33.350)

(A) Does this serve a conservation purpose or reason? **No.** There is very little annual commercial harvest effort on either the Tsiu or Kaliakh Rivers and in-season management has the proper tools to allow for harvest while still achieving escapement goals.

(B) Does it correct an error in regulation? **No.** It instead looks to remove management's ability act responsively to year-to-year geological shifts in the Yakutat area rivers.

(C) Does it correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** The Yakataga Management Plan allows management to adjust the fishery markers annually for the Tsiu River based on water levels and geologic change to ensure there is proper escapement. It is not necessary to establish new, static regulatory boundaries when management already has a much more dynamic and responsive tool to the shifting geology of the Tsiu.

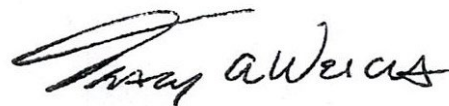
Is this proposal predominantly allocative? **Yes.** It would put increased constraints and limit harvest opportunity specifically on the set gillnet fleet in the name of conservation, with no considerations for other user groups.

UFA thanks you for your service to the State of Alaska and your consideration of our comments.

Sincerely,



Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association •
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn • Groundfish Forum • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association •
Northern Southeast Regional Aquaculture Association • Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William
Sound Aquaculture Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation
Alliance • Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern
Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association

Submitted by: Michael J Webber

Community of Residence: Eagle River

I am writing to object to ACR 8 as it does not meet the criteria. My name is Michael J. Webber and I am a Tlingit, Alutiiq, Eyak and my home lands go specifically from the North Gulf Coast (Yakutat), to Kodiak. The Kaliakh River has been my family's traditional fishing river for thousands of years. My grandson is named Kaliakh. It is a spiritual place where I have many ancestors buried and it is important for me to say that because ACR 8 could mean losing fishing grounds that my family has relied on for generations. Since 2018 I have commercially set net fished in the Kaliakh and Tsiu Rivers. Specifically I have fished where the Kaliakh meets the ocean and the river narrows and gets deeper. In fact it is the only part of the river where I can operate my boat throughout the stages of the tide. Ive studied the Policy For Changing Board of Fisheries Agendas and Id like to voice my thoughts and observations. The past two years (2024, 2025) as the rivers have joined, we have been neighbors and fished alongside the sport fishermen. Our first approach has been to introduce ourselves and build relationships. I can report experiencing no conflicts with sport fishermen or their guides, and can clearly see there is abounding opportunity for sport fishermen to catch their fish/limits. It is a thrilling time of year when the coho run for us and for the many visitors who come seeking limits. It is important for me to share this because when there are surplus fish like there are on both rivers, I want everyone to get the fish they need. I stand against needless fighting and arguing about restrictions.

Conservation of these stocks is vital to Mother Nature and all user groups. Since 1973, the year that surveys began, the Tsiu has reached its escapement goal every year a survey was able to be conducted. The Kaliakh is silty and cannot be surveyed and data is collected by CPUE (us). There are no conservation concerns with either river. The author's claim that the rivers suddenly changed course from a storm surge is false. I have observed through the years, and satellite photos show, that it has been a gradual process where they joined in 2024. After a conversation with biologist Rick Hoffman, there was an error made in the department's staff comments stating that the rivers joined in 2025. I can provide satellite photos that show they converged early in 2024.

Closing the Tsiu River commercial fishery which again has no conservation concerns is highly allocative. And according to the department of fish and game, commercial and sport harvest of coho promotes healthier stocks, by harvesting excess fish.

Sincerely,

Michael J. Webber

Submitted by: Michael J Webber

Community of Residence: Eagle River

My name is Michael J Webber, and I wanted to share a couple additional thoughts to go with my previous comments in opposition to ACR 8 not meeting the criteria: since 2018 I have seen where the sport fishing occurs on the Tsiu River which in the lower section of river in deeper holes where the river bends. With the Tsiu and Kailakh now flowing together, the area of confluence seems to have created a new spot for sport fishermen to fish. ACR 8 may be more about claiming a greater hold on a resource, and pushing out one user group than addressing conservation concerns and this is very concerning to me.

Also, my 11 year old son Teague Webber (who hopes to be a permit holder someday) who has deckhanded for me for three seasons, along with his friend Merrik Lee, who is a permit holder, regularly participate in the sport fishery on the Tsiu. At any chance they get between picks they go to the beach and sport fish. Their experiences in sport fishing occur when our nets are in the water fishing. They have no problem catching fish after fish. This is important for me to say this because it shows there is ample opportunity for all sport fishermen, and there is not a concern for escapement or conservation in the Tsiu. We know it is easy to catch coho in the clear Tsiu waters, while our nets are in the silty glacier waters of the Kaliakh. Rick Hoffman has already put in place restrictions of a 100 yards closure from the confluence, as well as the glacially occluded waters of the Kaliakh. So we cannot fish in the clear water. It is important that you know that Rick has already been aware of this situation and has addressed it to ensure escapement and opportunity for all. Any further action by the Board is unnecessary at this time. Please dont base your decision on subjective information from sport fishermen claiming they are not able to catch fish while our nets are in the Kaliakh because we know thats not true.

Sincerely,

Michael J Webber
