

**Alaska Board of Fisheries**  
**2024/2025 Agenda Change Requests**

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**ACR 1**

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

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

5 AAC 01.220. Lawful gear and gear specifications.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** Net restrictions to protect salmon should be eliminated in non-flowing waters (lakes) where salmon are not present.

**WHAT SOLUTION DO YOU PREFER?** Remove the mesh and net restrictions (4" mesh +60' length) in non-flowing waters.

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

**for a fishery conservation purpose or reason:** Not applicable

**to correct an error in regulation:** Not applicable

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** Use of large mesh nets should be allowed in lakes on non-flowing waters where salmon conservation is not a concern.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** People will not be able to use their existing nets in waters where there are no salmon. It's expensive and time consuming to buy or re-hang nets.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** No new or different user groups are involved.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Not allocative.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** Subsistence user.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** Unknown

**SUBMITTED BY:** Stephen F. Obrien

## **ACR 2**

Designate Susitna River king salmon a Stock of Yield Concern and adopt a regulatory action plan (5 AAC 61.XXX).

**CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.**  
5 AAC 61.XXX

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** Designate Susitna River drainage Chinook Salmon as a Stock of Yield Concern and adopt a regulatory Action Plan to rebuild the yield from this salmon stock.

According to a fact sheet published by the Alaska Department of Fish and Game (ADF&G) in 2008: *“The Susitna River king salmon run is the fourth largest in the state, behind the Yukon, Kuskokwim, and Nushagak Rivers. Between 100,000 - 200,000 king salmon return every year to the Susitna River drainage . . . about twice the number bound for the Kenai River.”*

According to ADF&G sport fishery harvest estimates for the 5-year period from 2000 - 2004: an average of 25,448 king salmon were harvested from the Susitna River sport fishery on an annual basis. But according to ADF&G sport fishery harvest estimates for the most recent 5-year period from 2018 - 2023: Susitna River drainage sport fishery Chinook salmon harvest has fallen to an average of 171 fish per year — this demonstrates a more than 99% decline in yield from this fishery — and should easily fit the 5AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries (SSFP) definition of a Stock of Yield Concern. *“A stock of yield concern is a concern arising from the chronic inability, despite the use of specific management measures, to maintain specific yields, or harvestable surpluses, above a stock's escapement needs; a yield concern is less severe than a management concern.”* Note: in 5 out of the past 7 years (2018 - 2024) there has been NO opportunity to harvest Chinook salmon from the Susitna River sport fishery.

It appeared, perhaps by oversight, ADF&G failed to bring forward this Stock of Yield Concern designation for Susitna River drainage Chinook salmon during the 2023 - 2024 Upper Cook Inlet meeting cycle. The Mat-Su Borough Fish and Wildlife Commission attempted to bring this issue forward at the Upper Cook Inlet Board of Fisheries Meeting on pages 19 and 20 of its 2024 publication, *It Takes Fish To Make Fish*. However, without ADF&G bringing this 99% reduction in sport harvest forward as an issue that could/should warrant a Stock of Yield Concern designation in the department's Stock Status Report, there was no proposal submitted to serve as a vehicle to address this issue — and for those reasons this ACR has been submitted for board consideration/action now.

## **WHAT SOLUTION DO YOU PREFER?**

Susitna River drainage Chinook salmon— Stock of Yield Concern. An Action Plan should then be developed, through the public process, providing reasonable opportunity to consider various management options, and following SSFP guidelines to rebuild the depleted Susitna River drainage Chinook salmon stocks.

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

**for a fishery conservation purpose or reason:** The Susitna River Chinook salmon stock is the largest king salmon stock in Upper Cook Inlet and is clearly dealing with sustainability issues. If there was a drainage-wide Chinook salmon escapement goal the entire Susitna River drainage chinook salmon stock would likely already be listed as a Stock of Concern — similar to the larger Yukon River and Nushagak River Chinook salmon stocks.

Another aspect of this issue that could and should be addressed within a regulatory action plan for Susitna River Chinook salmon on a drainage-wide basis is the declining age/size/length fecundity of the Susitna River drainage chinook salmon spawning escapement. As the age, length, and size of the spawning escapement population has declined since 2007, it is not logical to expect a spawning a) for a fishery conservation purpose or reason:

The Susitna River Chinook salmon stock is the largest king salmon stock in Upper Cook Inlet and is clearly dealing with sustainability issues. If there was a drainage-wide Chinook salmon escapement goal the entire Susitna River drainage chinook salmon stock would likely already be listed as a Stock of Concern — similar to the larger Yukon River and Nushagak River Chinook salmon stocks.

Another aspect of this issue that could and should be addressed within a regulatory action plan for Susitna River Chinook salmon on a drainage-wide basis is the declining age/size/length fecundity of the Susitna River drainage chinook salmon spawning escapement. As the age, length, and size of the spawning escapement population has declined since 2007, it is not logical to expect a spawning population made up of smaller less fecund fish to provide the same level of smolt production as had been previously provided by significantly older and larger king salmon escapement with a higher percentage of females in the spawning population.

Bottomline, even with no sport harvest allowed in 2023 and 2024, not a single Chinook salmon spawning escapement goal was attained anywhere in the Susitna River drainage. Unsustainability of Susitna River drainage Chinook salmon is a rapidly accelerating problem that may fit a drainage-wide Stock of Management Concern designation by the next Upper Cook Inlet Board of Fisheries meeting, and therefore should be dealt with — sooner rather than later.

The National Marine Fisheries Service is reviewing the stock status of Gulf of Alaska Chinook salmon to determine if all or some of those Chinook salmon stocks should be listed as threatened or endangered under the Endangered Species Act (ESA).

ADF&G currently has the authority to deal with salmon sustainability issues in Alaska — including the codified SSFP to guide management of Stocks of Concern. Since specific portions of the Susitna River drainage Chinook salmon stock have already been designated as Stocks of Management Concern, but the yield issue is drainage-wide and clearly fitting the SSFP criteria, it would be beneficial to show the State of Alaska is dealing with both issues of sustainability for Susitna River Chinook salmon — rather than giving any appearance of needing federal management or oversight for sustainability.

As stated in the ADF&G website publication, Gulf of Alaska Chinook Salmon: Endangered Species Act Status Review Key Points — federal management/oversight of Chinook Salmon under the Endangered Species Act could have much more severe consequences for multiple Alaska user groups:

*“A threatened or endangered ESA-listing transfers the management of the listed units and their critical habitats from the State to the federal government. An ESA-listing, in essence, means that NMFS believes state management is insufficient to protect the stocks from going extinct.*

*ESA listing of Chinook salmon will significantly harm subsistence, commercial, and recreational fisheries, causing cultural and economic harm. The listing of an Environmentally Significant Unit (ESU) will move management of that ESU from state control to federal control with restrictions that could span from fishery reductions to no-harvest at all. Any fishery with incidental catch of that Chinook ESU would also be impacted.*

*Listing means that ‘critical habitat’ for Chinook salmon will be designated, which could encompass a broad swath of freshwater and marine areas. Along with ESA-required consultations and permits, this will add regulatory hurdles for any activities that may affect salmon. Development in watersheds designated as critical habitat would be greatly restricted and require considerable regulatory review.”*

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

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** N/A

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Susitna River Chinook salmon declines in spawning fecundity and spawning escapement numbers may likely accelerate — requiring more severe future harvest and mortality restrictions before the stock can be rebuilt.

Federal decision makers may decide the State of Alaska is inadequately addressing Gulf of Alaska Chinook salmon sustainability issues and step in with federal oversight or management by declaring stock(s) threatened or endangered.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This ACR seeks to follow SSFP guidelines and provide a reasonable and open public process for addressing the Susitna River drainage chinook salmon lack of yield issue. Developing local solutions to an instate issue would likely have more agreeable outcomes, on a quicker timeline, than the federal process.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** N/A

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** The Mat-Su Borough Fish and Wildlife Commission is an advisory group to state and federal agencies and the borough assembly concerning issues affecting fish and wildlife populations, habitat, and resource users in the best interests of the Borough and its residents.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** To our recollection, the issue of Stock of Yield Concern for Susitna River Chinook salmon has been considered before — perhaps two, three, or more cycles ago, when drainage-wide yield had not fallen off to such a dramatic level.

**SUBMITTED BY:** Matanuska-Susitna Borough Fish & Wildlife Commission

### **ACR 3**

Designate Little Susitna River coho salmon a Stock of Yield Concern and adopt a regulatory action plan (5 AAC 61.XXX).

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

5 AAC 61.XXX. A regulatory Action Plan to be adopted.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** Designate Little Susitna River coho salmon — a Stock of Yield Concern and adopt a regulatory action plan to rebuild the yield from this important salmon stock, as measured by sport coho salmon harvest within the Little Susitna River.

Little Susitna River supports runs of all 5 species of Pacific salmon native to Alaska . For many years Alaska Department of Fish and Game (ADF&G) Management Reports for the Northern Cook Inlet Management Area described the Little Susitna River sport coho salmon fishery as follows:

*“It has been a consistent second to the Kenai River, which supports the largest freshwater coho salmon harvest in Alaska.”*

For the 5-year period from 2000 - 2004 ADF&G sport harvest estimates for Little Susitna River ranged from 13,672 to 20,357 coho salmon harvested per year with an average annual harvest of 17,137 coho salmon. For the most recent 5-year period with survey data (2019 - 2023) harvest estimates ranged from a preliminary 2023 estimate of 1,095 — 3,560 coho salmon per year with an average annual harvest of 2,499 coho.

For the most recent 5-year period Little Susitna River sport coho salmon harvest has declined by over 85% compared to the 2000 - 2004 5-year period. In addition ADF&G issued 5 in-season emergency order Little Susitna River sport coho salmon restrictions and 2 emergency order Little Susitna River sport coho salmon fishing closures during this same 5-year period. Note: this is an escalating problem as both season-ending closures came during the past two season (2023 and 2024) and the 2024 closure occurred 4 days earlier in the season compared to the 2023 closure. Little Susitna River estimated sport coho salmon harvest declined in 2022 compared to the 2021 harvest, in 2023 compared to the 2022 harvest, and (based on both earlier restriction and closure dates) will likely show another significant decline for 2024 compared to 2023. **Note:** the preliminary harvest estimate of 1,095 coho salmon for 2023 was already the lowest sport Little Susitna River coho salmon harvest estimate on record since 1977! The finalized 2023 Little Susitna River harvest estimate should be available from ADF&G before this request is considered.

**WHAT SOLUTION DO YOU PREFER?** Little Susitna River coho salmon— Stock of Yield Concern. A regulatory action plan would then be developed, through the public process, providing reasonable opportunity to consider and adopt various management options, following SSFP guidelines.

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



**for a fishery conservation purpose or reason:** Each level of Stock of Concern designation listed in the SSFP, along with an associated regulatory Action Plan, provides a means to address unsustainable fishery issues, that if not dealt with, often proceed to become larger conservation problems.

Little Susitna River has been one of the most productive coho salmon producers in Upper Cook Inlet. Little Susitna River has more stable water temperatures and more consistent, and earlier coho run timing that correlates well with other Knik Arm streams. The Department, therefore, uses Little Susitna River coho salmon weir passage figures as a proxy for what may be occurring throughout Knik Arm or may be about to occur in those systems with later run timing. Recent declines in coho salmon yield are not isolated to Little Susitna River, but also occurring throughout Knik Arm, in the Deshka River and related Susitna River drainage, and likely throughout all of Upper Cook Inlet.

Upper Cook Inlet coho salmon stocks, for some reason, experienced a large down in abundance that can be observed in both overall harvests and measured coho salmon spawning escapements during both 2023 and 2024. Measured coho escapement at Little Susitna River (3,726 partial count in 2023 ) and (878 with a season projection of 2,154 coho after the weir was overtopped by high water for 2024) show an alarming downward trend below the ADF&G establish Little Susitna River SEG coho salmon spawning escapement goal of 9,100 - 17,700 fish.

Deshka River measured coho salmon escapements echo this same downward trend at an even more extreme level (1,817 partial but most of the season count in 2023) and (a count of 642 projected by ADF&G to a final escapement of 1,375 coho in 2024). The Deshka River SEG coho salmon spawning escapement goal is 10,200 — 24,100 fish. If an uptick does not occur soon, or if more conservative management actions are not made, Little Susitna River and Northern Cook Inlet coho salmon populations and future coho salmon production could quickly become similar to the lost king salmon production now throughout all of Upper Cook Inlet.

With drastic declines in Northern and Upper Cook Inlet coho salmon yields and in coho salmon spawning escapements throughout Northern Cook Inlet, ADF&G and the Board of Fisheries should designate at least one specific coho salmon stock to help monitor and consider management changes that would better ensure sustainability for the extremely import coho salmon resource for Northern Cook Inlet user groups. Little Susitna River coho salmon for the reasons listed above may be the best stock to designate as a Stock of Yield Concern, although this ACR is open to consideration of additional or other Northern coho stocks being so designated, if the department, users, or the board have better options or additions that should be included.

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

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** N/A

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** 85% of the yield from the sport fishery has already been lost. Sustainability and future lost yields need to be considered.

If the drastically declined coho salmon spawning escapements continue, for only two additional seasons, Little Susitna River coho salmon and Deshka River coho salmon (ADF&G's indicator coho stock for the entire Susitna River drainage) may both qualify as Stocks of Management Concern before the next Upper Cook Inlet Board of Fisheries Meeting. This is an issue to start addressing before we get to that state.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This ACR seeks to follow SSFP guidelines and should provide a reasonable public process providing input from all user groups for addressing the declining inriver yield and corresponding decline in spawning escapement numbers of Little Susitna River coho salmon. This is an action identified in 5AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries (SSFP) to deal with a Stock of Yield Concern, and should have been initiated by the Alaska Department of Fish and Game (ADF&G) during the 2023 - 2024 Upper Cook Inlet Board of Fisheries cycle as stated,

- (1) at regular meetings of the board, the department will, to the extent practicable, provide the board with reports on the status of salmon stocks and salmon fisheries under consideration for regulatory changes, which should include
  - (ii) identification of any salmon stocks, or populations within stocks, that present a concern related to yield, management, or conservation; and
  - (iii) description of management and research options to address salmon stock or habitat concerns;

Board members should consider that Not Addressing this problem for an entire board cycle ( since ADF&G avoided mentioning it and its severity in the Stock Status Report) may have significantly more allocative implications than considering the problem, one year later than the regular cycle identified in the SSFP.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** N/A. See answer to question above.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** As legislators representing residents of the Mat-Su Valley / Northern Cook Inlet / State of Alaska we have an obligation to help maintain the sustainability of Little Susitna River coho salmon fisheries and the economic, social, recreational, and food security benefits they provide for many resource users of the Upper Cook Inlet Region.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** To the best of our knowledge this issue has never been brought before the board, either as an ACR or as a proposal.

**SUBMITTED BY:** Sen. David Wilson (Co-Chair), Rep. George Rauscher (Co-Chair), Sen. Shelley Hughes, Sen. Mike Shower, Rep. Cathy Tilton, Rep. DeLena Johnson, Rep. Kevin McCabe, and Rep. Jesse Sumner.

#### **ACR 4**

Increase the season dates and weekly fishing periods for dip net gear under the *Kenai River late-run king salmon stock of concern management plan* (5AAC 21.382).

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

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

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

The dipnetting provisions for the Upper Subdistrict setnet fishery in “5 AAC 21.382. Kenai River late-run king salmon stock of concern management plan” were instituted very late in the meeting process after all opportunity for public involvement and comment were past. As a result it was a very, very rough framework with a lot of unknowns. After this summer and prosecution of this completely new and experimental fishery, we know quite a bit more about it and some adjustment is warranted. Dipnetting in the open inlet is clearly very low efficacy and extremely dependent on many variables. Tidal Currents, Weather, and fish densities produce a huge range of results from completely unfishable to possibly financially viable harvests. This fishery is inherently perfectly clean, is 100% targetable and has zero impact on any king salmon returns. However current levels of opportunity are insufficient to produce relevant sockeye harvests. Due to the low impact nature of this fishery I would like to see increased time and opportunity allowed in order for people to actually try to make it work.

First, there is no reason for the fishery to close on July 31. With mandated release of both king and coho salmon there is no conceivable reason for this fishery to close early. Our fishing season has gone to Aug 15th for a very long time and substantial amounts of sockeye are still on area beaches in August.

Second, I would like to see a lot more open time so that people could work their fishing around it. Much of the time there will not be densities of fish to justify fishing, and it is incredibly important to be able to fish whenever there are sufficient fish on each individual fisherperson’s site to make the dipnetting work. Dipnetting in the open inlet is completely unprecedented. This is not dipnetting in a river. We regularly have weather that is completely prohibitive to the gear type. Fishing in 5 foot seas, the dipnets come completely out of the water with every wave which basically reduces effectiveness to zero. This seems obvious, but I in fact tried fishing one rough day this summer to see if it was as bad as I expected. It was. It is extremely weather dependent. Expecting the department to give opening times that are situated around weather, fish densities, and other scheduling issues for individual fishermen is completely unfeasible. I would like to see dipnetting open from 7am-7pm every day from June 20th to Aug 15th. Expected harvests are still quite low, and current management issues basically guarantee an overabundance of sockeye. Dipnetting 7 days a week is almost certainly warranted by sockeye numbers in all recent years. In the extremely unlikely case where managers were concerned about sockeye harvest in the dipnet fishery, they could easily close openers but this is so unlikely that I think it is entirely reasonable to have the default be scheduled fishing time. This would allow for planning and predictability for fishermen to work around other jobs and the fishing variables already mentioned and would relieve the pressure on the department to constantly make announcements. Particularly in the possible scenario where other gear types with higher catch potentials (beach

seines etc) are being actively managed by the department having them juggle dipnet openings as well seems completely unnecessary.

**WHAT SOLUTION DO YOU PREFER?**

5 AAC 21.382.(g).(5)

(5) From June 20 through [July 31] **August 15;**

...

(B) openings [may] **will** occur outside of specified openings in this section based on abundance of sockeye salmon **from 7am-7pm seven days a week unless closed by emergency order.** [as announced by emergency order, for not more than three 12-hour periods per week];

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

**for a fishery conservation purpose or reason:** Conservation concerns exist for both over escapement of sockeye salmon and under escapement of chinook salmon. The entire justification for the creation of this experimental fishery was for conservation purposes.

**to correct an error in regulation:** Not applicable.

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** This fishery was highly experimental, and literally all effects of it were completely unforeseen and unknown when adopted. Now that more data, knowledge, and experience is available adjustments are required.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** We will not be able to develop this new fishery that both the board and the department were supportive of, fishermen will continue to not have access to their historical resource, and we will continue to exceed the goals for sockeye management placing stress on the river systems.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This fishery is a miniscule percentage of historical allocation of the ESSN fishery and has essentially no allocative implications on other user groups due to very low expected harvests and over abundant sockeye stocks.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Everything about this fishery is new information.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** I am a life long ESSN fishermen interested in trying to develop a fishery that will provide opportunity within current management restraints.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING? No.**

**SUBMITTED BY:** Joseph Person

**ACR 5**

Increase the season dates in which dip nets may be used under the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382).

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

5 AAC 21.382. Kenai River late-run king salmon stock of concern management plan.  
5 AAC 21.382(g)(5) “From June 20 through July 31”

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

The problem that we would like the BOF to address is that in its current form, the regulation does not coincide with run timing in the Kenai and Kasilof rivers and allow for S04H harvest opportunities for larger than expected sockeye runs and late timed sockeye runs. After going over 2024 sockeye return data to the Kenai and Kasilof rivers with F&G biologists, daily sockeye returns to these rivers indicate that S04H permit holders can be beneficial and used as a harvest aid at least 15 days past the July 31 current harvest deadline. From August 1<sup>st</sup> to August 9<sup>th</sup>,2024 when the counters were pulled, the Kenai River escapement was 230,780 sockeye on an over escapement and with several more weeks of returning sockeye not counted. The in river goal is 1.1 million to 1.4 million. The following are the Kenai River sonar counts since 2013: 2013: 1,359,893  
2018: 1,035,761      2023: 2,343,976  
2014: 1,520,340      2019: 1,849,054  
2015: 1,709,051      2020: 1,814,054  
2016: 1,383,692      2021: 2,441,825  
2017: 1,308,498      2022: 1,570,395  
Per Table 81-3 Kenai River sockeye salmon harvest and escapement goals 1999-2023.

**WHAT SOLUTION DO YOU PREFER?** We propose to change the June 20 through July 31 timeline to June 20 through August 15.

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

**for a fishery conservation purpose or reason:**

**to correct an error in regulation:**

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** When the S04H commercial dipnet gear was implemented as a tool for the late run King stock of concern management plan, it did not take in account the possibility of large escapements and late timed runs of sockeye on the Kenai and Kasilof Rivers. Both River systems have been over escaped many times in recent years since the ESSN fishery has been restricted. This ACR will enable management to have a tool, if needed, to allow S04H sockeye harvest for an additional 15 days. As Kings and Coho are not retained and released unharmed, this ACR will have no effect upon their respective returns but will allow the possibility of the harvest of late run and over escaped sockeye by ESSN permit holders. This ACR will also fall within specified guidelines in 5AAC 21.382(b) “The provisions of this management plan are in effect from June 20 through August 15”.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** If this problem is not resolved prior to the next regulatory cycle, a tool that will assist in the management of the overescapement and late timed sockeye runs of the Kenai and Kasilof rivers will not be able to be utilized even though the management plan is from June 20 through August 15. Also, it would strengthen the economic viability of the late run King Salmon stock of concern management plan by allowing excessive sockeye to be harvested and sold that otherwise would be deemed detrimental to an over escaped river system.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This ACR is not allocative as it only adjusts dates already specified in 5AAC. 21.382(b).

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Does not apply.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** We are all S04H permit holders and are stakeholders in the Upper Cook Inlet Fishery. Our goal is to make our fishery more sustainable and more economically viable while seeking a more viable pathway to operate within the guidelines of the Kenai Late Run King stock of concern management plan.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** This ACR has not been previously considered by the BOF.

**SUBMITTED BY:** Russell Clark, Lance Alldrin, Mary Alldrin, John Manley, Allan Crookston, Brian Scow, John Bailey, Cheryn Clark, Arthur Brown, Jeff Dent, George Maccabee, Chris Maccabee, Rick Jewell, Laura Maccabee, Mike Markham, Zack Markham, Greg Johnson, Colby Engstrom, Joseph Person.



## **ACR 6**

Increase the number of days per week that dip nets could be utilized under the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382).

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

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

5 AAC 21.382(g)(5)(B) “openings may occur outside of specified openings in this section based on abundance of sockeye salmon, as announced by emergency order, for not more than three 12-hour periods per week”.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** The problem that we would like the BOF to address is that in its current form, the regulation reduces the commercial viability of the dipnet regulation as per CFEC regulations as per statute AS 16.43.990 “economically healthy”.

AS 16.43.990 Definitions.

(2) “economically healthy fishery” means a fishery that yields a sufficient rate of economic return to the fishermen participating in it to provide for, among other things, the following: (a) Maintenance of vessels and gear in satisfactory and safe operating condition; and (b) ability and opportunity to improve vessels, gear and fishing techniques, including when permissible, experimentation with new vessels, new gear, and new techniques.

In its current form, the dipnet regulation only provides for (3 )12-hour periods per week. Often, weather conditions limit commercial fishermen from dipnet fishing due to safety concerns and thus limit available safe days for fishing. Also, in river dipnet user groups are allowed 7 days a week and often 24 hour days. Fishing in the open Inlet is more challenging and thus requires flexibility with conditions. To fish the open Inlet and make commercial dipnetting more viable and safer, more 12 hour available periods are needed.

**WHAT SOLUTION DO YOU PREFER?** We propose a change to the existing three day 12-hour periods a week to read as “up to seven 12-hour periods per week”.

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

**for a fishery conservation purpose or reason:**

**to correct an error in regulation:**

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

During the 2024 Upper Cook Inlet sockeye season, the return was greater than expected. In its current state, the regulation does not provide for expanded fishing time for ESSN dipnet fishermen to harvest unexpected larger returns of sockeye. During the 2024 sockeye season, all in river user groups were open 7 days a week and the drift fleet openings were expanded to try to harvest the surplus sockeye that normally would have been harvested by the ESSN fishermen.

The ESSN dipnet fishermen were restricted to the 3 periods per week and often did not get to fish due to weather.

Many S04H setnet fishermen found during the 2024 setnet season that under various conditions, we could actually harvest some sockeye with dipnets. During meetings and communications with the CFEC, we found that they are questioning the viability of the use of dipnets as a means of commercial harvest. With a 3 day per week restrictive regulation and weather limitations on those days, the CFEC has indicated a question on the dipnets viability as have S04H permit holders. We feel that this may have been unforeseen by the BOF and with no data available, the BOF introduced the 3 day per week limitation. The dipnet regulations also provides for (4) 5 ft diameter dipnets per permit holder and crew. This is a huge reduction in gear normally available to the permit holder which also in turn poses a challenge to make the dipnet days available viable. The unforeseeability of exactly how the dipnets would perform in the open Inlet with no data warrants a review to increase the available number of available fishing days to help compensate for our reduction in gear.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** If this problem is not resolved prior to the next regulatory cycle, S04H permit holders will be further deprived of otherwise viable fishing opportunities that would help the CFEC to quantify the dipnets as viable to use during the Kenai River late run King Salmon stock of concern management plan. Also the introduction of more available fishing days for commercial dipnet fishermen will enhance managements tools for dealing with overescapements as we have been having. In 2024, approximately 30 S04H permit holders participated in commercial dipnetting with a harvest of 26,644 sockeye which is an indicator that more fishing days are warranted.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This ACR is not allocative as it does not exclude ANY ESSN fishermen but otherwise encourages a greater participation of its stakeholders. It is not allocative of any in river user groups or the drift fleet as they already are allocated more fishing opportunities than we are asking for.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Not applicable.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** We are all S04H permit holders that are concerned with the future of our fishery and would like the opportunity to make our fishery more viable during the Kenai River late run King stock of concern plan.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** This ACR has not been previously considered before by the BOF.

**SUBMITTED BY:** Russell Clark, John Manly, Lance Alldrin, Rick Jewell, Colby Engstrom, Brian Scow, George Maccabee, Chris Maccabee, John Bailey, Cheryn Clark, Mary Alldrin, Cayleigh Clark, Arthur Brown, Allan Crookston, Jeff Dent, Laura Maccabee, Mike Markham, Zack Markham, Joseph Person, Greg Johnson, John Bailey.

## **ACR 7**

Allow the use of leads during dip net fishing periods described in the *Kenai River late-run king salmon stock of concern management plan* (5AAC 21.382).

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

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

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** The dipnetting provisions for the Upper Subdistrict setnet fishery in “5 AAC 21.382. Kenai River late-run king salmon stock of concern management plan” were instituted very late in the meeting process after all opportunity for public involvement and comment were past. As a result it was a very, very rough framework with a lot of unknowns. After this summer and prosecution of this completely new and experimental fishery, we know quite a bit more about it and some adjustment is warranted. Dipnetting in the open inlet is clearly very low efficacy and extremely dependent on many variables. Tidal Currents, Weather, and fish densities produce a huge range of results from completely unfishable to possibly financially viable harvests. This fishery is inherently perfectly clean, is 100% targetable and has zero impact on any king salmon returns. However current levels of opportunity and effectiveness are insufficient to produce relevant sockeye harvests. Dipnetting historically took place inside rivers with extremely high density of fish available. These densities are very rarely available in most of the 40 miles of beach in the setnetting area. Due to the low impact nature of this fishery I would like to see if its possible to increase the effectiveness and harvest capability of the gear type while maintaining its cleanness and ability to release low abundancy stocks.

Current Regulations allow in other fisheries the use of a “Lead” to direct fish and increase the effectiveness of existing gear.

**5 AAC 39.105.(d).(18) a lead is a length of net employed for guiding fish into a seine or set gillnet**

In June of 2024 my family approached the department to request a commissioners permit to test using a lead to increase the effectiveness of the new dipnet fishery and were refused on the grounds that the dipnet fishery had been established by the Board of Fish and consequently any modifications to it must be done by the Board.

Using a lead in the method I am proposing to increase efficiency of the dipnet fishery has some substantial advantages over other new gear types that have been discussed and/or tried under commissioners permit.

- 1) It retains all of the “advantages” of the dipnet in regards to close attention of gear and the capacity to immediately release any chinook salmon with a very high survival rate.
- 2) It is compatible with existing setnet infrastructure and viable/achievable/executable for all historical participants in the fishery.

- 3) It requires a relatively low investment for historical participants which is very important when harvests in any of these new harvest methods will be a fraction of historical harvest levels.

The singular lead per permit that I am proposing would be fished on a pre-existing setnet location; would utilize a maximum of 35 fathoms of seine webbed lead, with a maximum mesh size of 3 ½ inches; a maximum depth of 50 meshes; and require an opening of a minimum of 15 feet in the center of the lead in order to ensure all fish freely pass through the lead without entrapment.

What this would look like in practice is a funnel that directed fish to the center and allowed the fisherman to then dipnet at that point. The high currents of upper cook inlet require this sort of lead rather than a traditional straight lead that has the harvesting gear fished off the end. In our currents that sort of lead inevitably would have some amount of “arc” or “belly” and risk fish being pressed against it by current. A funnel shaped lead with a large gap in the middle ensures that fish would properly lead down the seine web and pass freely through the middle. This would potentially allow more effective and potentially financially viable dipnetting by improving the lower concentrations of fish that exist most of the time in the open inlet compared to traditional dipnetting which has taken place in rivers that have greatly concentrated fish compared to the inlet at large.

The gear requirements specified mirror the web currently being used in the experimental beach seines and furthermore the 50 mesh maximum depth is approximately equivalent to 29 meshes of traditional setnet gear and consequently a majority of kings may pass under the lead without being impacted at all while shallower swimming sockeye are concentrated for more effective dipnetting. Even with this concentrating effect, dipnetting is so inherently inefficient that a significant percentage of fish that pass through the lead will still not be harvested but it will potentially help the fishery approach the threshold of viability.

#### **WHAT SOLUTION DO YOU PREFER?**

5AAC 21.382.(g).(5).(F)

(F) one lead per commercial set gill permit is allowed to direct fish for the purposes of dipnetting as follows;

- (i) Length not to exceed 35 fathoms of effective lead
- (ii) Depth up to 50 meshes
- (iii) Seine web with a Mesh size not to exceed 3 ½ inches
- (iv) Contains an opening centered in the lead with a minimum width of 15 feet. This opening does not count towards the length of the lead and the lead must be fished in such a fashion as to allow fish to freely pass through the opening.

The lead may be set up to one hour before the start of the opening, and must be removed from the water within one hour of closure of fishing.

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

**for a fishery conservation purpose or reason:** Conservation concerns exist for both over escapement of sockeye salmon and under escapement of chinook salmon. The entire justification for the creation of this experimental fishery was for conservation purposes.

**to correct an error in regulation:** Not applicable.

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** This fishery was highly experimental, and literally all effects of it were completely unforeseen and unknown when adopted. Now that more data, knowledge, and experience is available adjustments are required.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** We will not be able to develop this new fishery that both the board and the department were supportive of, fishermen will continue to not have access to their historical resource, and we will continue to exceed the goals for sockeye management placing stress on the river systems.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This fishery is expected to be a miniscule percentage of historical allocation of the ESSN fishery and has essentially no allocative implications on other user groups due to very low expected harvests and over abundant sockeye stocks.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Everything about this fishery is new information.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** I am a life long ESSN fishermen interested in trying to develop a fishery that will provide opportunity within current management restraints.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** No.

**SUBMITTED BY:** Joseph Person

## **ACR 8**

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

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

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

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

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

### **WHAT SOLUTION DO YOU PREFER?**

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

5 AAC 21.382 (g)

(6) From June 20 through August 15:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## **ACR 9**

Increase the bag, possession, and size limits for rainbow trout in the Kenai River (5 AAC 57.120).

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

5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area.

2024 Sport Fishing Regulations Summary South Central Alaska, p. 58, General Regs: Kenai River Tributaries: Rainbow/Steelhead Trout \*In flowing waters: 1 per day, 1 in possessions, must be less than 16 inches long.

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

According to studies on the Kenai River, the large Rainbow trout have become the predators of the river, eliminating schools of all species of salmon fry. In order to protect all salmon species, harvesting rainbows 20" or longer would have the greatest impact on conservation, protecting all species of salmon. Rainbows removed from the water must be kept for bag limit. The rainbow trout have taken over the Kenai River, causing a decrease in all species of salmon returns.

### **WHAT SOLUTION DO YOU PREFER?**

General Regulation: Rainbows/Steelhead Trout: \*In flowing waters: 3 per day, 3 in possession, must be more than 20" long.

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

**for a fishery conservation purpose or reason:** According to studies on the Kenai River, the large Rainbow trout have become the predators of the river, eliminating schools of all species of salmon fry. In order to protect all salmon species, harvesting rainbows 20" or longer would have the greatest impact on conservation, protecting all species of salmon. Rainbows removed from the water must be kept for bag limit. The rainbow trout have taken over the Kenai River, causing a decrease in all species of salmon returns.

### **to correct an error in regulation:**

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** When the original regulation was adopted, it was unforeseen that the Rainbows would take over the Kenai River.

### **WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Rainbows will continue to deplete the salmon returns.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** It does not allocate a single fishery.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE. N/A**

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** Sport angler.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** Unknown

**SUBMITTED BY:** Sue Stephenson & Donna Anderson. Sterling Sportfishing Support.

**ACR 10**

Expand time and area in waters of the lower section of the Kenai River that bait is allowed (5 AAC 57.121).

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

5 AAC 57.121

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** Bait restrictions allocated one whole user group.

**WHAT SOLUTION DO YOU PREFER?**

**5 AAC.57.121 Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of Kenai River Drainage Area.** Expand time and area in waters of the Kenai River that are limited to only one **baited**, single-hook, artificial lure as follows: Section 5 AAC 57.121 Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. From **August 15-October 31** in the Kenai River from Bing's Landing upstream to the mouth of the Upper Killey River, only one **baited**, single-hook, artificial lure may be used

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

**for a fishery conservation purpose or reason:**

**to correct an error in regulation:** The Board of Fisheries did not have sufficient input from the affected user groups. It appears this regulation is allocative in nature, by completely eliminating a small user group. Current or local studies were not used to write or support the elimination of bait. Eliminating bait does not protect coho salmon.

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** When 5 AAC 57.121 was amended to eliminate bait January 1-December 31, one whole user group was eliminated from the fishery for the whole year. This is allocative in nature.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Further discrimination against a fishery, which is mostly comprised of the elderly, disabled, disabled veterans, and future generations. Traditional knowledge will be extinguished.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This ACR does not allocate a fishery.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** N/A

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** Sport angler.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES**

Unknown. We submitted 2 Emergency Petitions. Both were denied.

**SUBMITTED BY:** Sue Stephenson & Donna Anderson. Sterling Sportfishing Support.

**ACR 11**

Create a Kvichak River Special Harvest Area to allow harvest of Kvichak River sockeye salmon while conserving Naknek River sockeye salmon (5 AAC 06.XXX).

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

5 AAC 06.XXX. New Section.

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

**WHAT SOLUTION DO YOU PREFER?** Kvichak River Special Harvest Area. Create the KRSHA from Graveyard upriver to the confluence of the Alagnak River. This management tool would provide an opportunity for fishermen while allowing sockeye passage into the Naknek River.

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

**for a fishery conservation purpose or reason:** The Naknek River had the lowest escapement for the date on July 12<sup>th</sup> 2024 (?) in 50 years. Fisherman had a previously scheduled opener cancelled. For conservation of the Naknek River, without completely shutting down the drift fleet, on years when the Kvichak River has robust forecast and escapement.

**to correct an error in regulation:**

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

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Under escapement of the Naknek.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** The tool could be used for drift or set gear types.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** N/A

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** S03T permit holder

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** No.

**SUBMITTED BY:** Kyle Lints

**ACR 12**

Create a new herring food and bait fishery in the Alaska Peninsula-Aleutian Islands Area (5 AAC 27.610).

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

5 AAC 27.610. Fishing seasons and periods for Alaska Peninsula-Aleutian Islands Area.

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

I would like the board to clarify the food & Bait Herring fishery from cape Lazeref to Kupreanof Point. Currently, a sac roe fishery exists from April 15 through June 24 to be opened by emergency order. Once established, I would like the board to consider a food & bait fishery to follow the June 24 closure.

**WHAT SOLUTION DO YOU PREFER?** I am trying Clarify a food &bait regulations & dates in the Alaska Peninsula

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

**for a fishery conservation purpose or reason:**

**to correct an error in regulation:** Regulations in Ak Pen. elude to a food & Bait fishery but don't clarify from cape Lazeref to Kupreanof Point

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** The lack of clarification has resulted in a complete lack of harvest of the food & bait herring in the Alaska Peninsula

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** An abundant resource will continue to go unharvested in the Alaska Peninsula. Also communities will continue to suffer from access to this resource. The State of Alaska's recent interest in creating sustainable herring fisheries will aid in this process

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** It's not, it's an open access fishery

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

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR. AK**

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** Not from me, or to my knowledge

**SUBMITTED BY:** Taylor J. Lundgren

### **ACR 13**

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

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

5 AAC 09.332. Seine specifications and operations.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** Ongoing concern over chum and chinook salmon populations in the Arctic Yukon Kuskokwim (AYK) drainages, in part due to commercial salmon interception in the South Unimak and Shumagin Islands June fishery (fishery).

#### **WHAT SOLUTION DO YOU PREFER?**

(a) Purse seines or hand purse seines may not be less than 100 fathoms nor more than 250 fathoms in length. A purse seine or hand purse seine may not exceed 325 [375] meshes in depth. Seine mesh may not be more than three and one-half inches, except that the first 25 meshes above the leadline may not be more than seven inches. (b) A lead [LEADS] may not be [LESS THAN 50 FATHOMS NOR] more than 100 [150] fathoms in length. The aggregate length of seine and lead may not be more than 250 fathoms in length. Only one lead may be used with a seine. [A LEAD MAY BE ATTACHED TO ONLY ONE END OF A SEINE, AND THE LEAD MAY NOT BE ATTACHED TO THE BOAT END OF THE SEINE.]

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

**for a fishery conservation purpose or reason:** The fishery has averaged 677,232 chums per season over the past five years, the highest five-year average in decades, while chum stocks in the AYK region are struggling to even meet escapement goals.

The huge changes made in regulations for the area in 2004, and the recent rapid growth of the purse seine fleet has resulted in this recent increase in chum interception in the fishery. Current regulations allow the aggregate length of purse seines and leads in this area to be up to 400 fathoms in length. That is 60% longer than what is allowed in Kodiak and Lower Cook Inlet (250 fathoms), and 78% longer than what is allowed in Chignik and Prince William Sound (225 fathoms). Current regulations also allow purse seine depth in this area to be a maximum of 375 meshes. The deeper a purse seine, the more incidental chums and chinook salmon it will catch as they travel at greater depths than the other salmon species that are targeted in this fishery.  
to correct an error in regulation:

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

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Continued harvest of nontargeted salmon species in this fishery, with chums being currently predominantly intercepted by the purse seine fleet. For those nontargeted



salmon species who are bound for the AYK Region, another year of continued harvest of nontargeted salmon, further exacerbating recovery efforts in this region.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This is not seeking allocate salmon from one user to the other, but to assist in limiting the incidental harvest of nontargeted salmon species in one fishery to allow those salmon to return to their natal streams to spawn.

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

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** Subsistence users from another region.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** Unaware.

**SUBMITTED BY:** Western Interior Alaska Regional Advisory Council

## **ACR 14**

Allow CFEC salmon set gillnet permit holders who form a joint venture in the Central Section of the Northwest Kodiak District to operate 25 fathoms additional set gillnet gear (5 AAC 18.331).

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

5 AAC 18.331 Gillnet specifications and operations.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** In the January 2024 Kodiak BOF meeting, a last minute change to regulation was adopted by the Board of Fish to add 25 fathoms of net per permit for setnetters in the Central Section of the Northwest Kodiak District, changing the total net length from 150 fathoms to 175 fathoms per permit. However, the wording in the joint venture section of the regulations addressing Gillnet Specifications and Operations was not updated to reflect the additional 25 fathoms of gear allowed per setnet permit in the Central Section of the Northwest Kodiak District.

The current (historic) joint venture regulation allows only: “5 AAC 18.331 (e) (6) no single set gillnet may be more than 150 fathoms in length; and (7) a joint venture may operate no more than three set gillnets, with no more than 300 fathoms of gillnet gear in the aggregate.” It is not updated updated to allow 175 fathoms in length and 350 fathoms in aggregate in the Central Section of the Northwest Kodiak District.

By not updating the wording of the joint venture regulation to reflect the additional gear allowed setnetters in the Central Section of the Northwest Kodiak district, a problem was created where people who have joint ventures are unable to fish 50 fathoms of gear that all other permit holders in the Northwest Kodiak District have available to them. The joint venture regulations for Kodiak setnetters, adopted in 1985, were written to allow 2 permit holders to work together and combine gear without diminishing the length of the nets allowed. This allowed more flexibility for fishermen working together to configure their gear to optimize their unique sites. For example, joint venture participants could fish three (3) 100 fathom nets instead of being restricted to the more traditional split of 75 fathom nets.

If this is not corrected and stands as written in 1985, joint venture participants in the Central Section of the Northwest Kodiak District will be limited to 150 fathoms per net, not 175 fathoms as granted by the Board of Fish in January, and will be limited to 300 fathoms in aggregate as opposed to the 350 fathoms.

### **WHAT SOLUTION DO YOU PREFER?**

To update the regulation, the language in 5 AAC 18.331, section e, # 6 and # 7 would be changed to reflect the new allowed amount of gear for setnetters in the Central Section of the Northwest Kodiak District. This would read:

(6) no single set gillnet may be more than 150 fathoms in length; except that in the Central Section of the Northwest Kodiak District, no single set gillnet may be more than 175 fathoms in length;

(7) a joint venture may operate no more than three set gillnets, with no more than 300 fathoms of gillnet gear in the aggregate; except that in the Central Section of the Northwest Kodiak District, the aggregate length may be no more than 350 fathoms.

By updating the wording, the intent of the joint venture regulation, which is to allow two permit holders to work together to combine and fish their legally allowed gear, would be upheld.

**STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW.**  
**for a fishery conservation purpose or reason:** Not applicable.

**to correct an error in regulation:** Because the regulations with joint ventures for Kodiak Setnetters have always been tied to aggregate net length, and the aggregate net length per permit was changed from 150 fathoms to 175 fathoms at the January 2024 Kodiak BOF meeting, the joint venture regulations 5 AAC 18.331 (e) should have been updated to reflect the additional length allowed.

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** Because the regulations allowing an additional 25 fathoms for Northwest Setnetters were changed at the last minute during the January 2024 Kodiak BOF meeting, no one thought to question the Department of Fish and Game on whether this would affect anything else dealing with Gillnet Specifications and Operations. This change came only after public comment had ended, and the Joint Venture language which is tied to length of nets was overlooked.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** If this is not addressed prior to the next Kodiak board cycle, setnet families who fish joint ventures in the Central Section of the Northwest Kodiak District will lose out on 25 fathoms of web each - 50 fathoms total - that other setnet fishermen in this district have available to them.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** This is not an allocative proposal, rather it is a housekeeping item intended to update the joint venture regulations following actions taken at the latest Kodiak BOF meeting.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** This is not an allocative proposal.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** The Northwest Setnetters Association represents all setnet permit holders fishing in the Central Section of the Northwest Kodiak District.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** It has not been considered before.

**SUBMITTED BY:** Northwest Setnetters Association, Adelia Myrick.

## **ACR 15**

Define the term 'unit of gear' (5 AAC 39.130).

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

5 AAC 39.130. Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels; transporting requirements.

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

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

Since the beginning of set gillnet fisheries in Alaska, license holders and later Limited Entry Permit Holders worked together, often in family units, to fish several set gillnet sites co-operatively. Fish were taken, often by more than one skiff, from several nets (fished under several licenses or permit numbers) and co-mingled and then transported to a holding skiff for later delivery to a tender. At other times, if a tender were in the vicinity, fish taken from several nets were co-mingled and delivered directly to the tender. When these fish were delivered, they have been, primarily, delivered on one CFEC card by one set gillnet permit holder as the operator of the "unit of gear" as prescribed in 5AAC39.130 and understood to be all of the nets/permits fished co-operatively. Often the permit holder using the CFEC card for the "unit of gear" would change from delivery to delivery since all set gillnet permit holders were working co-operatively and actively fishing the "unit of gear".

For set gillnet fishermen and families fishing co-operatively, it has been understood that the "UNIT OF GEAR" prescribed in 5AAC39.130 encompasses all the gear being fished co-operatively as a "unit" since this has been common practice for more than a century and for the 50 years since the limited entry system and this regulation was created.

For set gillnet fishermen, often family units, working several nets together in small skiffs creates a safety net if something happens to one skiff, especially in adverse weather. It also provides help if one set gillnet is full of kelp, fish or has additional concerns. The skiffs working co-operatively then move from net to net to pick fish without regard to what permit is attached to each net and eventually deliver these fish to a tender. Moreover, a set gillnet permit holder is allowed (5AAC 39-107) to be "physically present at beach or riparian site" when the permit is being fished. This is often a wife or family member taking care of kids or otherwise supporting the co-operative set gillnet fishing operation. This person may not be able to be in the skiff while fish are being picked.

NOTE: All fish caught by co-operative set gillnet fishing operations are accounted for and are reported to fisheries managers for management purposes.

Recently, an Assistant Attorney General, apparently unfamiliar with the nature of the set gillnet fishery, issued a letter indicating that "it is not ok to have one permit holder collect all the fish from various permit holders and fishing sites and deliver on a single fish ticket with a single permit holder's name and CFEC number as if one person alone caught all the fish." "We expect

that your clients too will comply with these statutes and regulations, and if they do not, they should expect to be charged.”

Apparently, the DA is re-defining “unit of gear” for set gillnet fishermen working co-operatively as the gear attached to a single permit. The DA seems to be expecting all fish taken from the single permit’s gear to be separated and delivered separately. This is impossible for set gillnet fishermen and families fishing several permits co-operatively using a holding skiff and difficult or impossible for set gillnet fishermen working with the size limitations of small open skiffs. Moreover, it is a departure from the standard practice that has been in place for more than 100 years and substantively changes the fishery. Now, mothers with small children, older set gillnet permit holders that work as shore support and permit holders that may be many miles away from the tender are all expected to get in a skiff, multiple times a day, and travel to where tender deliveries may be taking place. Set gillnetting is and was envisioned as an opportunity for families, often several generations, to work together. ADF&G will attest that individual permit accounting is not needed for management purposes so long as the number of permits fished is known. Finally, it would impose an undue burden on set gillnet fishermen working co-operatively in a time when the entire fishery is struggling to survive.

“Unit of Gear” is not defined in regulation.

#### **WHAT SOLUTION DO YOU PREFER?**

1. The simplest solution would be to define “unit of gear” as follows: “For set gillnet fishermen fishing multiple limited entry permits co-operatively, “unit of gear” is defined as all set gillnet gear being fished by those permit holders working co-operatively and comingling their catch.”

2. A second solution, if folks are uncomfortable with defining “unit of gear” as suggested above would be to track the current regulatory language but add an exception to 5ACC 39.130 (2) and (11):

(2) the name and signature of the CFEC permit holder that operated the unit of gear with which the fish were taken; except that for set gillnet fishermen fishing limited entry permits co-operatively, the name and signature of one of the CFEC permits holders actively operating a unit of gear used as part of the co-operative fishery.

(11) the CFEC permit number of the operator of the unit of gear with which the fish were taken, imprinted on the fish ticket from the valid permit card or electronically captured for the valid permit card: except that for set gillnet fishermen fishing limited entry permits co-operatively, the name and signature of one of the CFEC permit holders actively operating a unit of gear used as part of the co-operative fishery.

3. A third possible solution could track what is done with the “D” permit in Bristol Bay. The regulation could read: “For set gillnet fishermen fishing multiple limited entry permits co-operatively, a single permit holder may imprint the fish ticket if the name and permit number of all the limited entry permit holders participating in the co-operative set gillnet fishing operation are also listed on the fish ticket. (Fish tickets would need to be revised to allow room for the list.)

4. A fourth possible solution would be to track the reporting requirements that are currently in place for the Kodiak Management Area “joint venture” regulation 5AAC18.331(e) and have the cooperative set gillnet fishing operation register with the Department prior to operations. (The details would be different than for the current joint venture regulations but the concept would be to identify the cooperative setgillnet fishing operation in advance and to allow one permit holder to use a card and stamp the ticket for the operation.)

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

**for a fishery conservation purpose or reason:** There is no conservation concern associated with this request.

**to correct an error in regulation:** The absence of a clear definition of “unit of gear” has become an apparent “error” in regulation. Changing the understanding of how set gillnet permit holders and families, working co-operatively, manage and deliver their fish, after more than 100 years of practice, would highlight an apparent “error” in regulation.

**to correct an effect on a fishery that was unforeseen when a regulation was adopted:** That a new understanding of “unit of gear” for set gillnet fishermen and set gillnet families fishing co-operatively would issue from the DA’s office was unforeseen when this regulation was adopted. Set gillnet fishermen and fishing families fishing co-operatively and delivering on one license had been standard practice since before limited entry. The adoption of this regulation was not intended to change historical practice as evidenced by the past 50 years of set gillnet fishermen and families fishing co-operatively and delivering on one permit. The fact that now, 50 years after CFEC regulations were adopted, an attempt to change how set gillnet fishermen and fishing families manage their gear and their fish was clearly unforeseen when the regulation was adopted.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Set gillnet fishermen and fishing families fishing co-operatively will operate in fear of being cited for not keeping each fish from each permit separate and for not delivering separately all fish caught from a given permit. Use of holding skiffs, especially those using ice or RSW, will be eliminated, the safety of several set gillnet skiffs working together will be compromised and family shore support permit holders who are unable to be “on the water” will be disenfranchised. Mothers with small children will no longer be able to be permit holders and older, often family members, that work at the setnet site cooking and as shore support may also be unable to hold permits.

This is an issue that illustrates unfamiliarity with standard set gillnet fishing practices and necessitates the Board’s attention so as not to put hundreds of set gillnet permit holders at risk of being cited for doing what they have done for generations. Waiting for this to be taken up during the normal board cycle for either Kodiak or State Wide finfish creates a substantial hardship for all set gillnet fishermen and families that work co-operatively to fish for salmon.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** Another gear type does not benefit from regulatory clarification or definition of “unit of gear”, consequently the ACR is not allocative.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Not allocative.

**STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR.** My family and I have set gillnetted on Kodiak Island for over 60 years. We have always worked co-operatively, co-mingled our fish and delivered on one permit card per delivery. Prior to limited entry we fished several State of Alaska licenses and our family qualified for several Limited Entry Permits. We fish on an open beach exposed to the Shelikof Strait and have prioritized the safety of several skiffs all working the fishing sites together as “a unit of gear” and co-mingling the fish. Many Kodiak Island set gillnet family fishing operations fishing cooperatively are similar to ours. I believe that this practice is also done in Yakutat, Main Bay in PWS, Cook Inlet, Area M and Bristol Bay.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING?** I’m not aware that the Board has previously considered this issue.

**SUBMITTED BY:** Northwest Setnetters Association & Duncan Fields