
ALASKA BOARD OF FISHERIES

Special Meeting: Supplemental Proposals 189-192

Webconference | May 1, 2026

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Name: Russell Clark

Russell Clark, Cheryn Clark, Whitney Clark, Cayleigh Clark, Daniel Adams, John Bailey, Udel Brown, Jesse Wallace. The aforementioned are all Cook Inlet setnet permit holders

Community of Residence: Kenai

192-Oppose. This proposal is a BOF generated proposal that is out of cycle for Cook Inlet. It also bypasses the normal ACR process and does not allow for oral debate by the user groups and interested parties affected. Beach Seines will be a proposal in the 2027 BOF Cook Inlet and should remain as such in order to give all parties equal access and comment. The following are reasons why 192 should not be passed and taken up at the 2027 meeting.

- 1). Beach Seines are not an approved gear type by the CFEC for the East Side. There is a permit classification for beach seines but a setnet permit cannot be fished as a beach seine permit no more than a drift permit can be fished as a purse seine permit.
- 2). Morality studies on the Columbia River using tagged kings and coho have determined that there is a high mortality rate post release of beach seine released kings and cohos and that is from one capture, not multiple captures as would occur in the ESSN fishery. Proposal 192 does not address any scientific Commissioners permit that may occur in Cook Inlet that would use viable data collection for mortality such as tagged kings and coho or micro tagged kings and coho. Unless such data collecting techniques are used any catch and release data collection will not give accurate mortality rates. Just releasing a king alive does not establish its post release viability.
- 3). Proposal 192 is unjustly allocative to a few setnet permit owners that have DNR beach leases. Numbers of proposed beach seines are only 35-43 out of 442 ESSN permit holders. The implementation of 192 will devalue permits in the ESSN fishery unless the permit holder has a DNR beach lease.
- 4). Proposal 192 allows for beach seine nets that do not conform in length to net lengths allowed by Alaska statutes or to DNR lease sites and offsets. 192 allows for 75 fathom seine nets instead of 35 fathom nets established for S04H permit holders. Why should a few permit holders get to fish 75 fathom nets when other permit holders are restricted to one 35 fathom net? A 75 fathom net changes the 600ft boundary currently used by statute as an offset between nets and unjustly allows seine nets to encroach on what otherwise would be open fishable water.
- 5). Proposal 192 will destroy the current commercial dipnet fishery that is proving to be a viable commercial fishery by closing access to near shore waters by a 600 ft restriction from any seine net or running line. This will put near shore access to a minimum and also place commercial dipnet fishermen potentially over 1200 ft offshore or more in order to maintain a 600ft distance. Commercial dipnets are typically operated within 100 ft from shore to be successful. Proposal 192 would now become allocative to the few beach seine fishermen by restricting access to the commercial dipnet fishermen.
- 6). Shore fishery leases currently do not have regulations for beach seines or net tracts for 75 fathom nets. By Alaska Statute and DNR statute, leases are configured for 35 fathom nets. Not 75 fathom nets. By allowing one 75 fathom beach seine per permit holder that has a beach lease, open fishing water that under current setnet statutes will be closed that otherwise would be opened under current DNR guidelines where if a DNR tract is not actively being fished by the lease holder then it can be fished by another permit holder. With only 35-43 active beach seines, no permit holders will be allowed to fish the otherwise open areas between as otherwise can occur with setnets.

7). Proposal 192 eliminates 97% of the ESSN permit holders as it will allow only 3% to be able to beach seine and does not allow for setnets to be fished while beach seines are being fished. Again, allocative.

Open for Discussion: If beach seines are to be considered for use in the ESSN fishery, the following should apply:

1). Beach seines should only be 35 fathoms in length in order to comply with current setnet statutes and offsets. A 35 fathom beach seine can be effectively operated in the existing DNR leases without encroachment and can be fished under similar methods as setnets.

2). Since a beach seine is a different type of gear than a setnet, it should go through the CFEC approval process as a new gear type and have public comment.

3). If there is one beach seine allotted to each permit holder, DNR leases should give lease holders preference to one beach seine site with the water 600ft away from the beach seine open to other fishermen to beach as current statute dictates on sites not being fished and. Classified as open areas. This would allow more fishermen to participate that otherwise would be excluded.

4). By implementing 35 fathom beach seines, king and coho bycatch and reach would be reduced by having the seines close to shore and would also put commercial dipnet fishermen closer to shore if a 600ft offset is implemented.

As proposal 192 is presented, we oppose.

Name: Mike Bethers
see attached comments

Community of Residence: Auke Bay Alaska

I'm a 78 year old life long hunter and fisherman and have been involved in the regulatory process for nearly 60 years. I am familiar with the state and federal processes and will make the following comment. Proposal 189-- traditional and local knowledge can be interesting however often lacks understanding of todays current resource uses and users and management capabilities and authorities. Only the best most current data available should be used in todays modern regulatory process. The state often has that data available however in the federal regulatory process it is commonly bypassed by regulators in favor of traditional or local knowledge. Consequently federal management is about the poorest management program in existence and for the state to even consider using such knowledge would be a huge step backwards in state resource management. Proposal 189 is about the worst idea Ive heard the state come up with in decades. Don't do it--thanks

Name: Trueman Philbrick

Community of Residence: Sitka

I do not support Proposition 189. It is written like a plot line out of avatar. Stick to science.

Name: Cory Loos

Community of Residence: Homer

I oppose 192. There is no need to establish a new gear type when the two current gear types aren't currently being managed by the state under MSA.

April 21, 2026

Via E-Mail and Online Portal
Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

The Native Village of Unalakleet is writing in support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making, and is something the Native community has sought for years. In 2023, AFN's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, we supported the Board's development of its Policy on Traditional Knowledge in 2024, and now support Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Respectfully,



Christopher Masters Jr.
Sergeant At Arms

Name: John Lamont
Lamont Consulting

Community of Residence: Lower Yukon River Communities

Proposal 189; I certainly am glad that the Board of Fish (hopefully and Game) are finally realizing that historic knowledge is important. Our past stakeholders never had a written or documenting form of retaining knowledge, but by word of mouth in our indigenous languages. This is so important that even little (seemingly insignificant) knowledge can affect a whole ecosystem (example: I've listened to Elders when I was young and they would say that all living animals, mammals, and our water and land cycle have turn over every twenty-five to sixty years and that you can observe it in rabbits to whales). I've witnessed that the new scientific knowledge holders base their data on current repetition over a given time period and that most decision makers use the data from "educated in the western world" scientists rather than implicit knowledge that has been passed on over time.

I like that the Board of Fish is including "These relationships may exceed direct references to the natural world to include values associated with an entire world view, such as reciprocity, respect, and relationality." in their explanation.

I happened to attend a Board of Fish meeting earlier this winter and was surprised that there was time allotted to traditional knowledge holders, thank you.

I support knowledge that is unique to a given culture or society encompassing a worldview that defines specific relationships between humans and nonhuman attributes of the world. This has always been how my ancestors retained their knowledge about the environment and resources that the environment provided over time. One does not need to use only local knowledge, but traditional knowledge about our ecosystem, fishery, or species of fish that has been passed on since time immemorial.

I support the Board of Fish in adopting this proposal. I know those who commercially fish may not agree with this proposal (as I am a dislocated, misplaced Traditional Yukon River Commercial Fisherman and have experienced a total fishery failure in my lifetime).



April 21, 2026

Via E-Mail and Online Portal
Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

I am writing to you on behalf of the Alaska Federation of Natives (“AFN”), the largest statewide Alaska Native organization, in support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board’s process.

AFN has long advocated for greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) in state and federal decision-making. In 2023, AFN’s membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board’s decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board’s deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges

cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, AFN supported the Board's development of its Policy on Traditional Knowledge in 2024, and now supports Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

AFN greatly appreciates your consideration and attention to this matter. We would be happy to talk to you further on this or any related issues.

Respectfully,

Alaska Federation of Natives

A handwritten signature in black ink, appearing to read "Ben Mallott", written in a cursive style.

Ben Mallott
President



April 21, 2026

Via E-Mail and Online Portal

Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

My name is Nicolette Corbett (Yup'ik). I am a cultural educator, the founder of Sew Yup'ik, and a member of the Cultural Advisory Committee for the Alaska Native Heritage Center. Through my work teaching traditional knowledge and skills across Alaska communities, I regularly witness how Indigenous Traditional Ecological Knowledge continues to guide respectful relationships with fish, land, and seasonal cycles. I am writing in support of Board of Fisheries Proposal 189, which would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making and is something the Native community has sought for many years. In 2023, the Alaska Federation of Natives membership passed **Resolution 23-02**, asking the Board of Fish and Board of Game to incorporate ITEK into their processes. Proposal 189 represents an important step toward honoring that request and strengthening trust between Alaska Native communities and the State.

Integrating Indigenous Traditional Ecological Knowledge into the Board's decision-making processes offers clear and meaningful benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, migration timing, environmental shifts, and stewardship responsibilities. This knowledge complements western scientific data and leads to more complete and informed decisions. Including ITEK in the Board's deliberations can help reduce conflict around proposals by creating a more inclusive process that respects the lived knowledge of

Alaska Native communities whose food security, culture, and identity are closely tied to salmon and subsistence lifeways.

As someone who works with families and communities throughout the Yukon-Kuskokwim region and across the state, I see firsthand how traditional knowledge continues to guide harvesting practices, seasonal awareness, and community well-being. Ensuring this knowledge is recognized in policy discussions supports stronger outcomes not only for fisheries management but also for cultural continuity and intergenerational learning.

Accordingly, I supported the Board's development of its **Policy on Traditional Knowledge in 2024**, and I strongly support **Proposal 189**. Establishing that the Board will formally consider Traditional Knowledge and Local Knowledge in its decision-making process reflects good governance and will lead to more informed discussions and better decisions for Alaska's fisheries and the people who depend on them.

Respectfully,

Nicolette Corbett (Yup'ik)
Founder, Sew Yup'ik
Cultural Advisory Committee Member
Alaska Native Heritage Center

Name: Kelsey Ruzich

Community of Residence: Juneau

Dear Chair Carlson-Van Dort:

My name is Kelsey Ruzich. I am writing in support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making, and is something the Native community has sought for years. In 2023, AFN's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, I supported the Board's development of its Policy on Traditional Knowledge in 2024, and now support Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Respectfully,
Kelsey Ruzich

Name: Marie Monroe

Community of Residence: Nenana, Alaska

I am writing in SUPPORT of Proposal 189 concerning the designation and recognition of Traditional Knowledge as an integral part of the Board of Fisheries meetings and their management processes. Scientific research and record keeping, combined with the cumulative knowledge of people who have subsisted on the land and resources for centuries, is the best path forward in recovering and sustaining these precious and irreplaceable resources.

Traditionally, indigenous people have inherently known that we must take only the resources that we can use and/or preserve. Wanton waste is intolerable. Respect for the natural resources and understanding that they are finite, is what has enabled people to live off the land for centuries.

Now, in modern times, there are more and more people vying for the same finite resources and thus, they must be managed in a thoughtful and responsible manner. To me, thoughtful and responsible management means seriously considering the cumulative knowledge of generations of people with firsthand experience and know how—those with Traditional Knowledge.

Every good practice comes from a deeply held, inherent knowledge. It's more than the education gained in attending classes and learning with the mind. It is the holistic knowledge gained by actually living on and learning from the land and resources for generations. And as I stated in the beginning of my remarks, inherent Traditional Knowledge in partnership with good scientific knowledge is a winning combination that will garner the very best results possible for all.

Name: David Cornberg

Community of Residence: Fairbanks North Star Borough

PROPOSAL 189

5 AAC 96.6XX. New Section.

I have netted and eaten Yukon River salmon since I first started living in the Kaltag area in 1977. I have personally known many local people who also caught and used Yukon River salmon. I have personally experienced the increases and decreases in amounts of fish of different kinds up to the present when, the last time I put out a small mesh subsistence net in the Yukon near Kaltag, the policy had reverted to its simplest form: catch what you can with a small mesh net and throw back any kings that you catch.

I think that there is a major flaw in both the BOF proposal language and in the way many contemporary Alaskans write and talk about Yukon salmon runs. The term managed is the main flaw. Indigenous people never managed any natural resources.

Before contact, especially in the Koyukon region with which I am most familiar, the indigenous people were what the anthropologists call "restricted wanderers". They were nomadic but the limits of their nomadism were the areas in which they could usually find sufficient food sources, especially meat and berries, to avoid starvation. The two most important areas were the rivers--Yukon, Innoko, Koyukok and Tanana--during the summer, and the trapping areas, such as the Kaiyuh Flats, during the winter.

They did not have hunting or fishing seasons regulated by any kind of local, state or federal government. They did not have restrictions on taking male, female, juvenile or newborn animals of any species, including salmon, caribou, ducks, geese, duck and geese eggs, and moose, once moose came into their traditional hunting areas. They did not manage any food, timber or water resources. This claim is false based on solid and sound historical evidence. Indigenous people did in Alaska what they have always done everywhere on the planet--they took whatever they could find to keep themselves alive.

The largest changes in the quantity of Yukon salmon, especially kings, have been due to changes about which the pre-contact indigenous people could have known nothing because they did not occur until recently--warming of the North Pacific Ocean, change in quantity and distribution of marine food sources for growing salmon at sea, intensive factory ship fishing in the North Pacific, and even more recently, increasing permafrost melting that is changing both the temperature and PH of many south flowing Brooks Range watersheds that include many salmon spawning areas. The only one of these conditions that can be "managed" in any way is the intensive North Pacific fishing. But, since warming of those waters is causing salmon species, especially growing kings, to move farther north, over-fishing is becoming less of an issue because there are fewer and fewer growing salmon to be taken there.

For me, clarity and honesty about what has and is actually happening is far more important than verbal hype about so-called indigenous management of natural resources. I might add that acknowledging so-called "traditional knowledge" at this time appears to be way too little and way too late. In his book "Shadows on the Koyukon", Sydney Huntington shares his personal experience of the extraordinary numbers of fish and wildfowl that he saw and used in his early lifetime, includes no nonsense about how he, his brother, his kin and his tribal members "managed" natural resources, and, as well, how he personally witnessed the drastic decrease in animal resources before he died. Sydney was extraordinarily intelligent and talented, very honest about his life and times, and nowhere in that book does he give any evidence of any kind that he and his people "managed" any natural resources.

Name: Rudolph Wilson

Community of Residence: Kenai

Proposal 192 Replace commercial set gillnet opportunity in the Kenai River Late-run King Salmon Stock of Concern Plan with a newly established set beach seine gear type.

I oppose Proposal 192, I have outside sets and have no means to fish this, this is reallocation of the fishery. This is creating a new fishery and eliminating another.

This has been done in secrete and not publisized or brought to many permit holders attention. The board of fish shouldnt even be bringing this forward unless it has been put out to the public. This is also devaiting from the normal process of the Board of fish, this shouldnt even be moved forward until 2027.

Thanks Rudy Wilson

Name: Mark Richards

Community of Residence: Fairbanks

Proposal 189 - Adopt a Policy on Traditional Knowledge into regulation, and incorporate the new concept into subsistence regulations

Dear Chair Carlson-Van Dort and members of the board,

While I support bringing Traditional Ecological Knowledge (TEK) into the Board of Fisheries process, this section of Proposal 189 is problematic: "The Board will provide the opportunity to sign-up prior to Board meetings to provide traditional knowledge relevant to the proposals and subject matter under consideration at that meeting. The time allowance is ten minutes."

Allowing those who wish to provide traditional knowledge the ability to sign up early and to have twice the time limit of other individuals who want to testify is discriminatory and not fair. Also, it has the potential to increase the number of days the board meets, which will increase costs.

Traditional knowledge is important, but the way this proposal reads the board is saying it is more important than all the other testimony. Once the board determines some individual testimony is more important than others, we are going down a path whereby decisions by the board will be deemed circumspect.

This is not the same as Fish & Game Advisory Committee representatives being given more time to testify or the ability to testify at certain times. AC representatives are representing a constituency from their local area and it is reasonable that they should be given more time and to testify when they want.

I encourage the board to rethink how it wants to incorporate traditional knowledge into the process in ways that don't end up increasing meeting times and costs and don't discriminate against other individuals who want to provide public testimony.

Thank you,

Mark Richards

Portage Creek Village Council

Portage Creek, Alaska 99576

Anchorage Office: 901 E Klatt Road Apt #1
Anchorage, Ak 99515
Phone/Fax: 907-277-1105/277-1104

April 21, 2026

Via E-Mail and Online Portal

Märit Carlson-Van Dort

Chair, Alaska Board of Fisheries

marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

My Name is Sophie Heinisch. I am the Vice-President of the Porage Creek Village Council (Ohgsenakale).

I am writing in for our Tribes support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making, and is something the Native community has sought for years. In 2023, AFN's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive

proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, Portage Creek Village Council supported the Board's development of its Policy on Traditional Knowledge in 2024, and now support Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Respectfully,

Sophie Heinisch

Tribal Vice- President

Name: john manley

Community of Residence: kenai

to the board on 192. in the past 3 years the east side setnet has caught least number of kings than any other user group in the stock of concern plan we have in place now. the king return numbers are starting to go up. the beach seine test in 2024 caught 16 kings in north k beach 15 small kings. the average size king in Alaska is 24in to 36in. how many of the 15 were average size kings. the setnet opener in 2025 did not catch any kings in north k beach same area were seine test wase done. now the board trying to replace 210ft setnet with a 400ft seine net? so beach seine fisherman pull his net out 105 ft and his net could be on setnet lease that setnet fisherman cant fish because one end wont be dry? or if the fisherman out side the beach seine could set one end dry he would be only be 400ft apart from the other? beach seine would have a negative affect on commercial dip net to be 600ft from beach seine would make it 1000ft off shore. the criteria for board generated proposal is vague and argumentative. there is no emergency to do this. the board wants more seine test done shows you thy are not sure of beach seine and yet you the the board is trying to replace setnet with seine net? this proposal 192 affect a lot of people who ether do not now about it or joust found out and only have a week to respond to 192 is not adequate time to do so. this is in your on criteria. more seine test can be done with out replacing setnet and changing the plan that is now in place and is working. one of our shore lease is as old as any beach lease and would not be abele to seine and we live in Alaska. some beach seiner would be able to who dose not even live in Alaska. this 192 has the most impact on our setnet fishing in cook inlet ever and the board is trying to rush it? nothing right about that. cant the board wait tell 2027? one of the board members has shone hatred and prejudice to east side setnet fisherman and he should not be aloud to vote.is there 4 members on the board who would stand up against hatred and prejudice and vote no on 192? i am not for proposal 192 .if the board is not sure of beach seine and need more test why replace setnet with beach seine?

CURYUNG TRIBAL COUNCIL

P.O. Box 216 – 715 Seward Street
Dillingham, AK 99576
Phone: 907-842-2384
Fax: 907-842-4510

Via E-Mail and Online Portal

April 22, 2026

Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

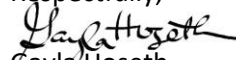
The Curyung Tribal Council is the federally recognized tribe in Dillingham. We have over 3200 tribal members with the majority living in Alaska. Our Tribal Council supports the Board of Fisheries Proposal 189. If adopted, proposal 189 add a new regulatory section on consideration of Traditional Knowledge in the Board's process. Our tribe expresses our gratitude for the work you and the board have put into implementing Traditional Knowledge in the Alaska Board of fisheries process. During the 2026 Bristol Bay Finfish meeting, Area M/Chignik Finfish meeting and Statewide Finfish meeting our tribe participated in the TK process and we believe this is an opportunity to share traditional knowledge, passed down from generation to generation. When the Board weighs proposals, they rely on biological data, harvest reports, and public comment. The TK process adds something distinct — a community-grounded understanding of how these fisheries and ecosystems have behaved over time.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making, and is something the Native community has sought for years. In 2023, the Alaska Federation of Native's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, the Curyung Tribal Council use of TEK in the development and adoption of the Nushagak River Traditional Use Area Conservation with other tribal governments and village corporations along the Nushagak River Corridor. This plan is one example of our knowledge used to identify river and land use, threats and strategies to protect the land and resources that depend on it for the future continued use for our people. This plan goes hand in hand with the Board's development of its Policy on Traditional Knowledge in 2024, and now support Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Respectfully,


Gayla Hoseth
First Chief

FORMAL PROTEST TO BOF PROPOSAL 192
(REPLACING SETNETS. WITH SET BEACH SEINES)

BY: RUSSELL CLARK ESSN PERMIT HOLDER

I AM WRITING TO EXPRESS MY OPPOSITION TO PROPOSAL 192, WHICH SEEKS TO INTRODUCE SET BEACH SEINE GEAR AS AN ALTERNATIVE TO SET GILLNETS IN THE ESSN COOK INLET FISHERY. MY OPPOSITION IS BASED UPON SIGNIFICANT CONFLICTS WITH EXISTING ALASKA STATUTES AND ADMINISTRATIVE CODES THAT HAVE NOT BEEN ADEQUATELY ADDRESSED, INACCURATE PRESUMPTIONS ON DATA COLLECTION ON METHODS OF CHINOOK AND COHO MORTALITIES, AND BOARD OF FISH GROSS PROCEDURAL ACTIONS TO PROSECUTE A GEAR TYPE THAT DISENFRANCHISES OVER 80% OF THE ESSN FISHERY PERMIT HOLDERS.

1. CONFLICT WITH DNR SHORE FISHERY STATUTES:
 - A. 11 AC 64.020 PARTICIPATION IN SHORE FISHERY: NO PERSON IS REQUIRED TO LEASE TIDE AND SUBMERGED LANDS TO PARTICIPATE IN A SHORE FISHERY. PROPOSAL 192 RESTRICTS PARTICIPATION TO PERSONS WITH A SHORE FISHERY LEASE OR TRADITIONAL FISH SITE ON THE BEACH. OPEN FISHING AREAS OVER 600 FT FROM OPERATING BEACH SEINES ARE NOT OPEN TO FISHING UNDER 192. THIS IS RESTRICTIVE IN PARTICIPATION BY OTHER PERMIT HOLDERS WHICH UNDER DNR STATUTES IS NOT ALLOWED.
 - B. AS 38.05.082 THE USE OF 400FT BEACH SEINES ON TRACTS CURRENTLY LEASED FOR "SHORE GILLNET OR SETNETS" VIOLATES THE EXPLICIT INTENT OF AS 38.05.082. BEACH

SEINES DO NOT MEET THE LEGAL DEFINITION OF A SETNET AS DEFINED IN DNR REGULATIONS (11 AAC.64.570).

AUTHORIZING THIS GEAR WOULD CREATE A LEGAL PARADOX WHERE PERMIT HOLDERS ARE USING GEAR THAT IS NOT AUTHORIZED UNDER THEIR STATE ISSUED LAND LEASES.

2. VIOLATION OF MIXED STOCK MANAGEMENT POLICY (AS 16.05.251(H)). INTRODUCING BEACH SEINES IN A KNOWN MIXED-STOCK AREA TARGETS SOCKEYE WHILE ENDANGERING KENAI RIVER LATE RUN KING SALMON, A STOCK OF MANAGEMENT CONCERN. AS 16.05.251(H) MANDATES MANAGEMENT CONSISTENT WITH SUSTAINED YIELD. WITHOUT COMPREHENSIVE, PEER REVIEWED DATA ON TOTAL MORTALITY (INCLUDING POST-RELEASE MORTALITY) FOR KING SALMON (AND COHO) IN BEACH SEINES, THIS PROPOSAL RISKS VIOLATING THE BOARD'S CONSTITUTIONAL AND STATUTORY MANDATE FOR CONSERVATION.
3. DIRECT REGULATORY CONFLICT (5 AAC 21.330). THE ONLY AUTHORIZED GEAR FOR THIS FISHERY IS SET GILLNETS AND DIP NETS. FURTHERMORE, 5 AAC 21.331 LIMITS NET LENGTH TO 35 FATHOMS. THE PROPOSED 420 FT (70 FATHOM) BEACH SEINES ARE DOUBLE THE LEGAL LIMIT REPRESENTING A RADICAL DEPARTURE FROM ESTABLISHED GEAR STANDARDS WITHOUT SUFFICIENT JUSTIFICATION.
4. ALLOCATIVE INEQUITY AND "COMMON USE" BY ALLOWING A GEAR TYPE THAT REQUIRES SIGNIFICANT CAPITAL INVESTMENTS

(SUCH AS 4WD TRACTORS, LOADERS, AND SPECIALIZED GEAR) THE BOARD WOULD BE CREATING AN UNFAIR ALLOCATIVE ADVANTAGE FOR A SMALL SUBSET OF PERMIT HOLDERS. THIS EXCLUDES THE MAJORITY OF THE FLEET AND RUNS CONTRARY TO THE COMMON USE PRINCIPLES OF THE ALASKA CONSTITUTION.

WHEN BOARD MEMBER CHAMBERLAIN BROUGHT PROPOSAL 192 FORWARD AS A BOARD GENERATED PROPOSAL, IT WAS ON THE BASIS TO GATHER MORE DATA ON KING AND COHO MORTALITY FROM BEACH SEINES BEFORE THE 2027 COOK INLET BOF MEETING.

1. DURING THE 2024 COMMISSIONERS PERMIT BEACH SEINE DATA, IT WAS REPORTED THERE WERE 20,653 SOCKEYE AND 16 KINGS CAPTURED IN TWO TEST BEACH SEINE PERMITS. EVEN THOUGH THE KINGS WERE REPORTED AS LIVE WHEN RELEASED, COLUMBIA RIVER, FRASER RIVER, AND STATE OF WASHINGTON REPORT POST RELEASE MORTALITY RATES OF SOMETIMES OVER 40%. THESE ARE PEER REVIEWED STUDIES USING TAGGING AND TELIMETRY TRACKING OF SUBJECT FISH. THE STATE OF WASHINGTON USES A STANDARD 33% POST RELEASE MORTALITY FOR CHINOOK IN BEACH SEINES. SO EVEN THOUGH 16 KINGS WERE RELEASED ALIVE IN 2024 FROM TEST BEACH SEINES, THERE IS NO WAY TO DETERMINE POST MORTALITY BECAUSE THE TESTS WERE NOT VIABLE STUDIES ON POST MORTALITY RELEASE.
2. PROPOSAL 192 IS BEING PROMOTED IN AN EFFORT TO ADVOCATE FOR FURTHER DATA COLLECTION ON CHINOOK AND COHO MORTALITY WITH COMPENSATION FROM COMMISSIONERS PERMITS TO A SELECT FEW FISHERMEN. FOR THE TWO 2024 COMMISSIONERS PERMITS, IT IS ESTIMATED THAT FOR 20653 TOTAL

SOCKEYE IF AN AVERAGE OF 5LBS EACH WOULD YIELD 103,265 LBS OF UNPROCESSED SOCKEYE. DURING 2024, \$2/LB AVERAGE ESTIMATE WOULD YIELD COMPENSATION FOR THOSE TWO COMMISSIONERS PERMITS OF \$206,530. IF PROPOSAL 192 PASSES AND THE COMMISSIONERS ISSUES FURTHER PERMITS FOR DATA COLLECTION AND COMPENSATION FOR THOSE PERMITS, JUST A FEW FISHERMEN WILL BE GIVEN EXCLUSIVE RIGHTS OF HARVEST WITHOUT PROVIDING PEER REVIEWED DATA ON POST MORTALITY RELEASE. NO TAGS AND NO TELIMETRY TRACKING WILL BE USED. NO BASIS OF HOW MANY TIMES A KING WILL BE CAUGHT WILL BE USED. IT WILL NOT BE KNOWN IF CAPTURED AND RELEASED KINGS AND COHO WILL EVEN SURVIVE. THE BOF WILL HAVE FAILED IN ITS MANDATE TO MANAGE ON SUSTAINED YIELD.

3. IMPLEMENTING A NEW GEAR TYPE AND GIVING BOF APPROVAL FOR UNTESTED EXPERIMENTAL GEAR DURING THE STOCK OF CONCERN MANAGEMENT IN ORDER FOR THE COMMISSIONER TO GIVE SPECIAL USER PERMITS BELOW THE 14,250 TRIGGER IN ORDER FOR COMPENSATION FOR FISHERMEN USING THOSE PERMITS VIOLATES NORMAL TESTING PROTOCOL ON FISH STOCKS. COMMISSIONERS PERMITS SHOULD NOT BE ISSUED WHERE FISHERMEN WILL BE COMPENSATED FOR TESTING THAT WILL NOT PRODUCE VIABLE DATA. ON JULY 3, 2025, A REQUEST FOR PROPOSALS (RFP) WAS POSTED FOR FISHERY DISASTER RESEARCH PROJECTS BY THE PSMFC IN COOPERATION WITH NOAA AND THE ADF&G OFFERING \$882,000 IN GRANTS TO SUPPORT RESEARCH ON KENAI LATE RUN CHINOOK. FUNDING WAS FOR UP TO THREE YEARS. NO ESSN BEACH SEINE APPLICATIONS WERE SUBMITTED.

OTHER SOURCES FOR PEER REVIEWED FUNDING FOR FISHERIES TESTS INCLUDE:

- A. NOAA FISHERIES GRANTS
 - B. ALASKA SEA GRANT
 - C. ALASKA SUSTAINABLE SALMON FUND
 - D. USDA NATURAL RESOURCES
 - E. US DAA NATURAL RESOURCES CONSERVAATION SERVICE
 - F. ALASKA DEPT OF FISH AND GAME
 - G. US ENVIRONMENTAAL PROTECTION AGENCY CLEARINGHOUSE FOR ENVIRONMENTAL FINANCE
 - H. RESTORE AMERICAS ESTUARIES
 - I. NATIONAL WILDLIFE FEDERATION NATURE-BASED SSOLUTIONS
 - J. HOMER FOUNDAATION
4. STUDIES FOCUSING ON CHINOOK AND COHO POST MORTALITY USING BEACH SEINESS SHOULD EMPLOY TELEMETRY (RADIO OR ACOUSTIC TAGS) OR MARK-RECAPTURE (PIT TAGS) AS METHODS TO TRACK LONG-TERM SURVIVAL, AS SHORTTERM OBSERVATION (UNDER 24 HOURS) OFTEN UNDERESTIMATES MORTALITY. CROWDING IN NETS, WATER TURBIDITY, SURF, HANDLING TIME, WATER TEMPERATURE, OXYGEN CONTENT, BLEEDING, SCALE LOSS, EQUILIBRIUM ARE ALL FACTORS A PEER REVIEW STUDY WILL ADDRESS. SORTING FISH IN SURF WILL AFFECT MORTALITY AS WILL SALMON BEING DRUG UP ON THE BEACH.
5. THERE IS NO DETERMINATION AS TO THE MORTALITY OF CHINOOK AND COHO POST RELEASE IF CAPTURED MULTIPLE TIMES BY BEACH SEINES. WITH 400FT BEACH SEINES WHEN RELEASED, THERE IS A HIGH LIKELYHOOD THAT RECAPTURE WILL OCCUR UPON MULTIPLE OCCASIONS.

THE BOARD GENERATED PROPOSAL 192 FACES PROCEDURAL ISSUES

1. BOARD MEMBER CHAMBERLAIN STATED THAT IT WAS IN THE PUBLICS BEST INTEREST TO BRING FORTH PROPOSAL 192 BASED UPON COOK INLET DISASTER DECLARATIONS. PROPOSAL 192 WOULD IN FACT REDUCE PARTICIPATION IN THE BOF AND CFEC APPROVED COMMERCIAL DIPNET FISHERY. BY ALLOWING 70 FATHOM BEACH SEINES WITH 600FT OFFSETS FOR COMMERCIAL DIPNETS, PROPOSAL 192 WILL BASICALLY KILL THE FLEDGELING DIPNET FISHERY. CURRENTLY MOST COMMERCIAL DIPNETTING OCCURSS EITHER ONSHORE OR WITHIN 100 FT FROM SHORE. THE 600 FT OFFSETS PUT COMMERCIAL DIPNET FISHERMEN OFF OF DNR LEASES THAT ARE BEING FISHED AND PUT THEM WELL OVER 1000FT OFFSHORE TO CLEAR ANCHOR AND RUNNING LINES. TO MY KNOWLEDGE THERE HAS NOT BEEN ANY MOUNT OF SUCCESS COMMERCIAL DIPNETTING FURTHER OFFSHORE. AGAIN, BEACH SEINES WIL EXCLUDE THE MAJORITY OF FISHERMEN.
2. BOARD MEMBER CHAMBERLAIN ALSO STATES THAT 192 MEETS THE URGENCY REQUIREMENT DUE TO NEEDING MORE DATA BEFORE THE 2027 COOK INLET BOF MEETING. AS STATED EARLIER, ANY DATA PRODUCED BY COMISSIONERS PERMIT UNDER THE 14250 KING THRESHOLD WILL NOT PRODUCE VIABLE DATA ON POST RELEASE MORTALITY, RECAPTURE, AND OTHER PEER REVIEW PARAMETERS.
3. PROPOSAL 192 IS AN OUT OF CYCLE PROPOSAL GENERATED AFTER ALL OPORTUNITY FOR PUBLIC TESTIMONY WAS PAST IN THE LAST

BOF MEETING. PUBLIC TESTIMONY WILL NOT EXIST OR WILL BE SEVERELY LIMITED TO DETERMINE THE EFFICACY OF PROPOSAL 192. AS WITH OTHER PROPOSALS THAT HAVE SUCH A PROFOUND IMPACT ON A FISHERY AND ITS USER GROUP. TO THE POINT OF BEING EXCLUSIVE, PROPOSAL 192 SHOULD BE DISCUSSED IN CYCLE.

4. THE PLAN TO MAKE BEACH SEINES AN APPROVED GEAR TYPE AND THEN ALLOW FOR TESTING UNDER THE 14250 THRESHOLD IS DISCRIMINATORY TO FISHERMEN THAT HAVE PREVIOUSLY APPLIED FOR COMMISSIONERS PERMITS FOR TESTING FLAGGED NETS AND WERE DENIED PER THE COMMISSIONER "THE COMMISSIONER DOES NOT HAVE THE AUTHORITY TO ISSUE AN INTERIM-USE (EXPERIMENTAL) PERMIT, FOR AN EXISTING GEAR TYPE, IN A FISHERY THAT HAS BEEN CLOSED FOR CONSERVATION REASONS. AN INTERIM-USE COMMISSIONERS PERMIT MAY BE ISSUED ON AN EXPERIMENTAL BASIS IN COMMERCIAL TAKING OF A FISHERY RESOURCE WITH VESSEL, GEAR, AND TECHNIQUES NOT PRESENTLY QUALIFYING FOR LICENSING UNDER CHAPTER 05 OF ALASKA STATUTE TITLE 16 AND IN CONFORMITY WITH STANDARDS ESTABLISHED BY THE CFEC (AS 16.05.050(9))." PROPOSAL 192 MAKES BEACH SEINES AN APPROVED GEAR TYPE AND THUS VIOLATES THIS STATUTE IF COMMISSIONERS PERMITS ARE ISSUED FOR COMPENSATION FOR FISHERMEN UNDER THE 14250 THRESHOLD. "TO PROVIDE HARVEST OPPORTUNITY ON MORE ABUNDANT SOCKEYE SALMON, THE BOARD INSTITUTED DIPNETS AS LEGAL GEAR FOR S04H PERMIT HOLDERS". IF FLAGGED NET TESTING WAS DENIED BY THESE STATUTES THEN BEACH SEINES SHOULD ALSO.

5. PROPOSAL 192 OPENS THE BOF TO POTENTIAL CONFLICT OF INTEREST VIOLATIONS OF THE ETHICS ACT, WHICH PROHIBITS MEMBERS FROM TAKING OFFICIAL ACTION WHERE THEY HAVE A PERSONAL OR FINANCIAL INTEREST. BOARD MEMBER SVENDSEN WAS ON THE RECORD DURING THE 2025 BOARD OF FISH MEETING IN MARCH WHERE HE STATED THAT HE WOULD LIKE TO SEE ALL GILLNETS REMOVED FROM COOK INLET. BOARD MEMBER SVENDSEN IS ALSO A MEMBER OF KPFA WHICH OFTEN TIMES IS IN DIRECT CONFLICT WITH COOK INLET COMMERCIAL FISHERMEN. MEMBER SVENDSEN ALSO OWNS PROPERTY IN POACHERS COVE SUBDIVISION ON THE KENAI RIVER WHICH HAS A BOARD MEMBER ASSOCIATION FOR THE EXCLUSIVE FISHING SUBDIVISION WHICH ALSO HAS AN INPLACE LOT LEASE PROGRAM FOR THE POACHERS COVE ASSOCIATION THAT GIVES BENEFIT TO MEMBER SVENDSEN IF HE SO CHOOSES. AS IN THE AREA M CONTROVERSY, CRITICS MAY ACCUSE THE BOARD OF FAVORING CERTAIN FISHING INTERESTS THROUGH REGULATORY DECISIONS. IN BRINGING PROPOSAL 192 FORWARD AND IF PASSED OUT OF CYCLE, THE BOARD MAY BE EXPOSING ITSELF TO LITIGATION WHERE ALLEGATIONS OF THE BOARD BREACHING STATE PROCEDURES WHICH CAN BE INTERPRETED AS AN UNFAIR PROCESS BY THOSE AFFECTED BY THE REGULATIONS.
6. ACCORDING TO ALASKA ADMINISTRATIVE CODE 5 AAC 39.105(6), A BEACH SEINE IS A FLOATING NET DESIGNED TO SURROUND FISH, WHICH IS SET FROM AND HAULED TO THE BEACH. IT IS A SPECIFIC TYPE OF LEGAL GEAR DEFINED IN REGION-SPECIFIC REGULATIONS, (5 AAC 18.332) AS HAVING MINIMUM LENGTH/DEPTH REQUIREMENTS TO DIFFERENTIATE IT FROM OTHER GEAR. KEY

COMPONENTS OF THE DEFINITION ARE THAT IT IS SET FROM AND HAULED TO THE BEACH OR TO A VESSEL ANCHORED TO THE BEACH. ITS OPERATION IS SPECIFIED ONE END OF A BEACH SEINE MUST REMAIN ON A BEACH ABOVE THE WATER SURFACE AT ALL TIMES DURING THE SET AND THE OTHER END NOT ANCHORED. SET BEACH SEINES ARE ANCHORED ON BOTH ENDS WHEN SET WITH THE OUTSIDE ANCHORED BY AN ANCHORED BUOY. IN THE SET POSITION SALMON ARE FUNNELED INTO THE OPENING BY DIRECTION OF THE CURRENT. IN THIS CONFIGURATION THE SET BEACH SEINE IS A FIXED STRUCTURE WITH THREE SIDES AND AN OPENING. IN ALASKA, A FISH TRAP IS DEFINED AS A, USUALLY LARGE-SCALE STATIONARY OR FIXED GEAR TYPE DESIGNED TO CORRAL FISH, SPECIFICALLY SALMON, INTO AN ENCLOSURE, MAKING ESCAPE DIFFICULT. FISH TRAPS ARE ALSO DEFINED AS ESTABLISHING PROTECTIVE TERRITORIES AND EXCLUSIVE TO ITS USER. SET BEACH SEINES ARE FIXED ENTITIES AND ALSO ESTABLISH PROTECTIVE TERRITORIES THAT ARE EXCLUSIVE TO ITS USERS THAT DIVULGE OVER 80% OF THE ESSN PERMIT HOLDERS OF THEIR PERMITS USE.

FOR THE ABOVE REASONS I STRONGLY OPPOSE THE PASSAGE OF PROPOSAL 192 IN ANY FORM AMENDED OR NOT.

RESPECTFULLY SUBMITTED,

RUSSELL CLARK, ESSN PERMIT HOLDER



Central Council of the Tlingit & Haida Indian Tribes of Alaska

April 23, 2026

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

Sent via email.

RE: Central Council of the Tlingit & Haida Indian Tribes of Alaska Comments on RC 182 “Proposed Traditional Knowledge Policy (5 AAC 96.6XX)”

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

The Central Council of the Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) respectfully submits these comments for the May 2026 Supplemental Alaska Board of Fisheries meeting regarding the proposed Traditional Knowledge Policy (5 AAC 96.6XX). Tlingit & Haida represents more than 38,000 Tribal Citizens whose cultural, spiritual, nutritional, and economic wellbeing is inseparable from the sustained health of fisheries and marine ecosystems in Southeast Alaska. Our Tribal governance systems, laws, and stewardship practices are rooted in thousands of years of continuous relationships with these resources.

The Board of Fisheries operates under *AS 16.05* (Alaska Fish and Game Code) and implements regulations through 5 AAC. With that authority comes a responsibility to ensure its decisions are informed by the best available information, including knowledge systems developed through generations of stewardship and direct relationship with Alaska’s fisheries. Tlingit & Haida strongly asserts that Traditional Knowledge (TK) is essential to meeting this mandate. In addition, Tlingit & Haida supports the Board’s effort to formally recognize TK as articulated in proposed 5 AAC 96.6XX(a). The acknowledgement that TK constitutes an “important aspect of best available science” is a necessary and overdue step.

However, as currently drafted, the policy remains aspirational rather than operational. The Board’s authority under *AS 16.05.251* requires conservation and sustained yield decisions to rely on the best available information. By defining TK as part of best available

science (5 AAC 96.6XX(a)), the Board has already established a legal basis that triggers an obligation to meaningfully incorporate TK into decision-making. Failure to operationalize this standard may create administrative vulnerability, including inadequate record-building under administrative law principles, failure to consider relevant factors (i.e., TK evidence) or arbitrary weighting of knowledge systems. To avoid these deficiencies, the policy must include clear procedural directives and documentation requirements. Tlingit & Haida recommends the following additions and considerations to strengthen the proposed TK policy:

1. Affirm Tribal-Specific Nature of Traditional Knowledge

The policy must explicitly recognize that Traditional Knowledge is Tribe-specific, place-based and non-transferable between Tribal sovereigns. Recommended addition: “Traditional Knowledge shall be understood as specific to the Tribe, community, and place from which it originates and shall not be generalized or substituted across Tribal Nations.” This clarification is critical given the existence of 229 federally recognized Tribes in Alaska, each with distinct governance systems, economic, and ecological relationships with fisheries.

2. Affirm Tribal Engagement

Current language states the Board will “seek and invite” TK holders but does not define how. This must be strengthened into a procedural requirement through documentation of outreach efforts in the administrative record.

3. Require Documentation and Use of TK in Decision-Making

The current proposal does not require the Board to demonstrate how TK is used. Recommended addition: “The Board shall document in its findings how Traditional Knowledge was considered, interpreted, and applied in its decision-making process.” This aligns with administrative law expectations and ensures TK is acknowledged and integrated into outcomes.

4. Expand Acceptable Forms of Traditional Knowledge Submission

While the proposal allows alternative formats at the Chair’s discretion, this should be guaranteed, rather than discretionary. We recommend remote testimony options, written TK reports, and/or audio/visual submissions. Many Tribes and communities lack the capacity to attend in-person meetings due to funding, staffing, and competing obligations.

5. Address Time Constraints for TK Testimony & Board Preparedness and Competency

The current 10-minute limit is structurally insufficient for the communication of TK. TK is often conveyed through storytelling, relational context, and intergenerational observations. As several years exist between statewide regulatory meetings, it is often difficult to convey TK and community impacts on several proposals at a time. Tlingit & Haida recommends providing flexibility beyond 10 minutes for TK presentations and strongly recommend the Board come prepared with questions to better engage in follow-up dialogue; meaningful engagement with TK requires preparation by decision-makers. Recommended addition: “Board members shall undertake reasonable efforts to understand the cultural, ecological, and regional context relevant to Traditional Knowledge provided.” This includes pre-meeting reviews of regional context, engagement with Tribal governments when appropriate, and development of informed questions.

To support successful implementation of this policy, Tlingit & Haida further recommends that the Alaska Department of Fish & Game establish a dedicated Tribal Liaison position. This role would help facilitate communication and engagement with Tribal governments, coordinate Traditional Knowledge submissions, support culturally appropriate engagement processes, and assist the Board in preparing for matters involving Tribes and Traditional Knowledge.

6. Clarify Distinction Between Traditional Knowledge and Local Knowledge

The proposal distinguishes TK and Local Knowledge, but risks conflation in practice. Tlingit & Haida strongly supports maintaining this distinction, and recommends explicit recognition that TK is rooted in Indigenous governance systems and worldviews. The Board must avoid substitution of local knowledge where TK is applicable and is the best information available. For thousands of generations, Indigenous Peoples have managed Alaska’s fisheries through systems grounded in reciprocity, responsibility, and intergenerational sustainability. These systems are proven governance frameworks that have sustained ecosystems over millennia. Integrating TK is not only a matter of inclusion but a necessary condition for effective fisheries management in Alaska.

Conclusion

Tlingit & Haida appreciates the Board’s leadership in advancing a Traditional Knowledge Policy. However, to fulfill its statutory obligations under AS 16.05 and its regulatory authority under 5 AAC, the Board must move beyond recognition and establish clear, enforceable mechanisms for the integration of TK. We respectfully urge the Board to adopt the policy with the strengthening revisions outlined above to ensure that TK is

meaningfully incorporated into Alaska's fisheries management system. If you have any questions, please reach out to the Office of the President at otp@tingitandhaida.gov.

Tlingit & Haida stands ready to work collaboratively with the Board to ensure this policy becomes a meaningful and durable framework for fisheries governance in Alaska. Gunalchéesh, Háw'aa (thank you) for your consideration.

Richard J. Peterson

Tlingit & Haida President





ORGANIZED VILLAGE OF KWETHLUK
Kwethluk Indian Reorganization Act Council
P.O. Box 130, 130 Church Way

Phone: (907) 757-6714/6715, Fax: (907) 757-6328, e-mail: kwethlukira@gmail.com

April 23, 2026

Via E-Mail and Online Portal

Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

We are from the Organized Village of Kwethluk. We are writing in support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making and is something the Native community has sought for years. In 2023, AFN's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.



ORGANIZED VILLAGE OF KWETHLUK
Kwethluk Indian Reorganization Act Council
P.O. Box 130, 130 Church Way

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Accordingly, we supported the Board's development of its Policy on Traditional Knowledge in 2024 and now support Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mary K. Nicolai', written in a cursive style.

Mary K. Nicolai, President

Organized Village of Kwethluk



NATIVE VILLAGE OF KOTZEBUE

PO Box 296, Kotzebue, Alaska 99752
(907) 442-3467 • www.kotzebueira.org

Tribal Government serving the Iñupiaq people of Qikiqtaġruk.

April 24, 2026

Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

The Native Village of Kotzebue has had the opportunity to review the Board of Fisheries Proposal 189, that adds a new regulatory section approving the use of Traditional and Local Knowledge in the Board process. Recognizing that many Alaskan's hold a wealth of first-hand and accumulated knowledge, that can be used to great effect when discussing the fisheries of Alaska and the management of them, is commendable of the Board of Fisheries. While this approach should have been in place since the beginning of the State's management of fisheries, we still appreciate the Board taking the steps now to propose and expectedly pass and incorporate this use into the Board of Fisheries process going forward.

The Native Village of Kotzebue supports the **Board of Fisheries Proposal 189** on Traditional and Local Knowledge and encourages the Board to pass this proposal.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Whiting', is positioned below the word 'Sincerely,'.

Alex Whiting
Environmental Program Director

Name: Jesse Walker
Coeur Mining, Inc.

Community of Residence: Juneau

The Board should not adopt Proposal 189. While traditional and local knowledge is valuable in decision making, it should not carry the same weight as biological data. Testimony based in traditional knowledge should be encouraged, and it should be afforded the same consideration as any other public testimony.

Name: Mitchum Senior

Community of Residence: Palmer

They are fishing game I do not often write comments, but I feel the need to do so.

Off late, it is apparent to me that the Department of natural resources has been moving in a direction that is increasing regulations and rules on us the citizens.

While there is a definite need for regulations and rules to sustain our natural resources, the burden of over regulating is destroying the resources and our communities by adding unnecessary and extreme pressure on us the citizens which then intern have less regard for their laws, regulations and resources that sustains us. This is a natural human tendency. I can confidently say that I am a law, abiding citizen. And I want to have the rules and regulations that are necessary to protect the resources, but I am afraid that these proposals are not necessary to protect the resources and this is an overreach in areas that are not needed to be regulated or passing rules on. I am aware that the king salmon numbers are down. I am willing to not catch a king salmon, but what is the reason for a snatch catching the king salmon when they are being caught on the high seas? Not only that King Salmon are reserved for sport fishers not the local residence in ALASKA so what is the value of a king Salmon to me and my family?

The idea is not just adding more regulation and rules to burden the residence of ALASKA the idea is to put the necessary rules and regulations in place to preserve the resources that benefit Alaskans.

If I have to read a textbook in order to go hunting and fishing because there is so much rules and regulations, what do you think will happen eventually? If you have any reasoning about human beings and history of humanity, you will know that those rules and regulations will eventually be ignored and good luck finding all the perpetrators of the law.

Now, let us use clear reasoning, do we really need to specify the fish wheel construction? Do we really need to start going in that fine grain with the state policies?

As for the king salmon if they have no value to us in Alaska, we can't catch them. We can't eat them but yet they're running up our rivers and we can't enjoy them so what should we do with them? What value are they to us?

And likewise, any of the other regulation and restrictions that you add to make the resource go outside of the reach of the common resident in ALASKA what value are those resources to us? Why should we care about them if they do not have any value to us? So may say preserving it for the next generation, but I can assure you that never wins. Take a look at the history of conservation and see for a fact that hunting and fishing has been the cornerstone of preserving these resources.

Final thought, thank you for reading my submission and please stop increasing unnecessary burden on us. The people of ALASKA and please stop limiting the resources available to us unnecessarily.

Name: Mike Bethers
and my sons family

Community of Residence: Auke Bay

I'm a 78 yr old life-long hunter and fisherman and have been associated with the regulatory process for over 50 years, including 23 years as a management biologist for ADFG where regulatory process was a daily activity. Do not adopt any proposals which would allow a regulation or regulatory change to be based on customary, local, or traditional knowledge . Regulatory changes should be made only based on the best most recent biological data available.

Traditional and local knowledge often is based on peoples memory of the best and worst of situations and not the normal or typical situation or condition, and is often very out of date. Our public resources in Alaska should be managed only using the BEST, MOST RECENT BIOLOGICL DATA AVAILABLE, and if its not available, do a project to get it and then get it done.

Thank you,
Mike Bethers

Name: Brent Johnson

Community of Residence: Clam Gulch

Brent Johnson

April 25, 2026

[REDACTED]
Clam Gulch, AK 99568

Alaska Board of Fisheries, regarding Proposal 192,

I'm a longtime setnetter in Corea Bend, ten miles north of Ninilchik. I've also seined for salmon and for herring.

Under Section (A) this proposal makes beach seines legal gear for setnet permit owners and makes setnets illegal gear.

In 2025 Brian & Lisa Gabriel graciously brought a beach seine to our setnet site. Using our tractor we deployed the seine on our running line and fished it for at least half an hour. We retrieved the seine and caught zero salmon. We did catch a lot of seaweed. It's my belief that seaweed will often prevent the use of beach seines between our site and Ninilchik. Seaweed is a problem after storms and by big tides. When seaweed comes we move nets away from shore because the seaweed rolls along the bottom and once a net is far enough out that the leadline doesn't drag the bottom, it doesn't catch much seaweed.

It is common for some setnet sites to have only offshore nets and no beach nets. They will be completely disenfranchised by proposal 192.

Stipulation D of proposal 192 requires fishing the seine on a Shore Fishery Lease. But setnets are not required to be on a Shore Fishery Lease. Very few setnetters in the area south of Clam Gulch have Shore Fishery Leases. We don't have one.

It would be exceedingly rare for a setnetter to own a beach seine. Building one would likely cost \$5,000 or more. At no time during the last 3 years has the forecast of 14,250 "large" king salmon triggered a setnet "opening" during the dates (June 20-July 31) stipulated in Section 1. This is just a way for the Board of Fish to further harm setnet fishers.

Two fishers can pick up a setnet and load it in a boat or pickup truck. A beach seine can only be moved with equipment or by restacking it. A seine full of seaweed can't catch salmon and would be a nightmare to move. Please don't pass proposal 192.

Name: Shawna Wolk

Community of Residence: Kasilof

Shawna Wolk

[REDACTED]
[REDACTED] Kasilof 99610

To: Board of Fish 2026

Re: proposal 192

Thank you for the opportunity to comment on and expressly oppose Proposition 192.

As a 35 year resident of Kasilof I've watched our community of setnetter families diminish with each Cook Inlet BOF decision limiting openers and now the legal style of fishing allowed.

Please do NOT implement Beach Seine.

Please do not place anymore restrictions on Setnetters.

Please do not pass proposition 192.

There's little to no evidence this will save Kings.

Please don't pass 192.

Hopefully you will choose not to.

Shawna Wolk

Name: Scott Adams

Community of Residence: Homer

I'd like to see proposal 192 to be pulled, and not even be concerned, for many reasons. The setup of the beach seine should be allowed to a use of a skiff. With the tides the way they are in Upper Cook Inlet, trying to do everything from the beach is setting up for disaster. Is the BOF not concerned about safety issues that could come up working in the tides of Cook Inlet, with a beach seine. A seine is a lot heavier than a gillnet, meaning the tide will make it harder to deal with. The cost of a seine is not cheap, so an added cost to a fishery that hasn't honestly fished for years, is another back breaker.

I find it interesting that the BOF have tried to get rid of the East Side Set Netters, instead of using methods that have cut the number of Kings caught. There is an elder gentleman that fishes near Kenai. He has swallowed up his net, in order to caught fewer Kings, he has fished like this for years. He has requested for years to have this a change in regulations and allowed to continue fishing.

I would like to see the BOF go that route, instead of beach seining or commercial dip netting, both are limiting the set netters the opportunity to make a living, and isn't the safest way to catch salmon in Upper Cook Inlet. Some of the set netters, are multi generational fishermen, trying to make an honest living.

If the BOF is actually looking for solutions to allow the East Side Set Netters to continue fishing for Sockeyes without large numbers of Kings. Use shallower nets, or maybe go back to the past and put in a few fish wheels & pens. Keep the Sockeyes and release the Kings.

Let's keep this fishery alive and allow all to participate.

Comments on Proposal 192. My name is Jim McGrath, I reside in Kasilof Alaska, I have worked in the Upper Cook Inlet commercial salmon fishery since 1982, and bought a SO4H permit in 1987, and established UCI ESSN fish sights approximately four miles south of the Kasilof River in statistical area 244-22 that year. I am a member of the Soldotna/Kenai Board of Fish and Game Advisory Committee. I oppose PROPOSAL 192.

PROPOSAL 192 WOULD AUTHORIZE THE USE OF FISH TRAPS IN THE UCI ESSN COMMERCIAL SALMON FISHERY.

WHAT IS A FISH TRAP

Fish traps are defined in Metlakatla Indian Community v. Egan, 369 U.S. 45 (1962)

“A trap consists of tall stakes or mechanically driven piling extending from the shore to varying distances seaward, depending on the depth of the water. Wire or webbing is stretched across the stakes or piling from the shore to the seaward end and from the ocean bottom upward to a point above high water. Located at the seaward end is an extended wing or hook and an opening into the heart and pot. When the webbing is on the ocean bottom fish cannot pass around the trap at the shoreward end. One tendency of migrating fish is to parallel the shoreline and travel with the incoming tide. Fish stopped by the webbing of a trap will eventually follow it seaward in an attempt to by-pass the obstruction. The wing or hook is constructed so as to discourage by-passing and divert the fish into the heart and pot where they remain. With some variations in construction, floating traps adapted to deep water are commonly used and are highly productive.”

RUNNING LINES ARE ANCHORS - COOK INLET SET BEACH SEINES ARE FISH TRAPS

PROPOSAL 192 would authorize the deployment and retrieval of “set beach seines” using “existing set gillnet infrastructure” known as ‘running lines.’ Set beach seines would replace set gillnets in the fishery. This running line fishing method allows a set beach seine net to be anchored to land above the upper beach water line and anchored on the seaward end of the net.

Cook Inlet ESSN Running lines are constructed with hand driven pilings installed above the water line on the upper beach and below the low water line at the seaward end. These pilings commonly consist of hand driven rebar, steel stake, or wood piling, and a pulley or block is secured to both the upper beach and outer seaward pilings. When a continuous running line is fed through the piling blocks and is unsecured, the running line moves freely through the system. When a set gillnet or “set beach seine” is set and deployed using a running line, a ‘running line stopper knot,’ or a ‘rolling hitch knot,’ is tied to the running line and is tied off to the upper beach pilings, or heavy tractor, or truck, above high-water line on the beach. This stopper knot keeps the running line from traveling freely through the piling blocks and secures the line and attached net in place making the entire running line static, fixed, and anchored. With the running line tied-off and fixed, the outer seaward piling and block at this stage functions as a prohibited seaward anchor, and the net is anchored at both the upper beach and seaward ends. With the seine net set and anchored a “hook” is set at the seaward anchored end from the beach to deter fish from leading around the outer end of the net, directing fish back to the ‘bag’ of the net. When the net is retrieved the running line stopper knot is untied and released and the

running line again moves freely through the piling blocks, the net at this point is unanchored allowing the outer end of the net to be towed in to the beach closing the net. It doesn't matter if an anchor line is 6 fathoms long or a 600-fathom continuous loop running line, an anchor is an anchor.

The UCI ESSN beach set seine is not in any way a floating seine net as defined in AAC 105.39.105 (6) and allowed under 5 AAC 21.382 (A) but is intentionally set, fixed, and anchored at both the upper beach end and the outer seaward end. An anchored set beach seine as fished in the UCI ESSN using this running line method meets the exact definition of a prohibited pile driven fish trap.

Adoption of PROPOSAL 192 and 5 AAC 21.382 would authorize the erection and operation of fish traps and is in violation of;

AS 16.10.070: Operation of fish traps. Fish traps, including but not limited to floating, pile-driven, or hand-driven fish traps, may not be operated in the state on or over state land, tideland, submerged land, or water. This section does not prevent the operation of small hand-driven fish traps of the type ordinarily used on rivers of the state that are otherwise legally operated in or above the mouth of a stream or river.

AS 16.10.100: Erection of fish traps prohibited on land or water owned by the state. Fish traps, including but not limited to floating, pile-driven, or hand-driven fish traps, may not be erected, moored, or maintained on or over land, tideland, submerged land, or water owned by the state.

A person who violates AS 16.10.070 is guilty of a misdemeanor and is punishable by imprisonment for not more than one year, or by a fine of not more than \$5,000 or by both.

PROPOSAL 192 would also authorize fish methods in noncompliance with the following Alaska Statutes and Alaska Administrative Code regulations;

5 AAC 39.260 - Seine specifications and operations (h) One end, and only one end, of a seine lead may be attached to land above the waterline. If the lead is attached to land above the waterline, no other anchor may be used on the lead, purse seine, seine vessel, or skiff. "Anchor" is defined in

5 AAC 105 (d) (19) an anchor is a device used to hold a salmon fishing vessel or net in a fixed position relative to the beach; this includes using part of the seine or lead, a ship's anchor or being secured to another vessel or net that is anchored;

5 AAC 21.382 (6) a beach seine is a floating net designed to surround fish which is set from and hauled to the beach

5 AAC 39.105 - Types of legal gear

(2) a set gillnet is a gillnet that has been intentionally set, staked, anchored, or otherwise fixed;

(6) a beach seine is a floating net designed to surround fish which is set from and hauled to the beach;

Ak. Stat 38.05.082 Leases for Shore Fisheries Development. The director, with the approval of the commissioner may lease tide and submerged land for fisheries development. Fisheries development includes the utilization of shore gillnets or setnets for the taking of fish.

5 AAC 18.332. Seine specifications and operations. [Kodiak] (e) When an anchor is used during the operation of a purse seine, hand purse seine, or beach seine, only the shoreward end of the seine or lead may be anchored; the seine shall be attached to the licensed vessel, and the vessel may not be anchored, except that, in the operation of a beach seine, an additional anchor, used to anchor the vessel to a beach, may be used only while retrieving the beach seine.”

WHEN AND HOW DOES A SEINE NET BECOME A FISH TRAP

The issue of when and how a seine net becomes a fish trap was addressed by the Board at the March 20, 2026 BOF meeting in Anchorage. PROPOSAL174 sought to delete 5 AAC 39.260 (I) Seine Specifications and Operations, which reads;

“(I) During the operation of a purse seine, the propulsion engines of the seiner or skiff assisting the operation, must be running and the vessel must be controlling configuration of the purse seine.”

Below is ADFG Staff and AWT testimony, and Fish Board members questions and comments on PROPOSAL 174 at the March 20, 2026 BOF meeting;

ADFG; “The Department saw significant increase in the number of [PWS Purse Seine] fishermen setting their seines as fish traps in the early 1980s. As a result, the department adopted regulations in 1985 to explicitly prohibit this practice and followed up in in 1987 to further clarify regulations adopted in 1985 to prohibit the use of seines as fish traps. The department opposes this proposal”

AWT testified that; 5 AAC 39.260 (I) “essentially closed a loophole and that people are not committing these violations [fishing seine nets as fish traps] and that this regulation is effective, so we too oppose this.”

Board member Carpenter; “when you’re operating a seine vessel with the motor off, you’re not fishing a seine at that point.... seining in very shallow water where the seine is anchored on the bottom and then it becomes a trap.”

Proposal 174 was rejected by the Board by a vote of 0 for and 7 against.

It is obviously Inconsistent and defies logic for the Board to correctly and unanimously reject adoption of Proposal 174 because it would have allowed PWS purse seiners to use their seine nets as fish traps, the Board then the very next day and proposed Board Generated Proposal 192 based on RC 177 authorizing the use of ‘set beach seines’ to replace set gillnets in the ESSN fishery in Cook Inlet. The restrictions that apply in the PWS purse seine fishery must be applied evenly in the proposed UCI ESSN set beach seine fishery. I reiterate that Cook Inlet “set beach seines” using “existing set gillnet infrastructure running lines” are being used as fish traps

COST RECOVERY

RC 177 and Board Generated Proposal 192 was presented as necessary to allow the fishery to go forward as commercial fishery with retention of fish for sale in 2026 to allow “cost recovery” in order to gather more data. Commissioner’s set seine permits were issued in 2014, for the 2015 season (9 years before the Kenai River king salmon were placed in stock of concern status) and in 2024 to Brian Gabriel and Gary Hollier on July 19, 2024, which authorized set beach seine experimental test fishery as a legal commercial gear type to harvest fish for commercial sale. The test set beach seine permit issued in 2014 did not fish in 2015, and the two 2026 permits produced no usable data. The 2024 Gabriel permit and partner Chris Every fished UCI 01, mostly in statistical area 244-32, and reported sale of 15,424 sockeye salmon sold, resulting in a gross income of around \$145,000 dollars. Hollier permit UCI 03 reported fishing seven days all in stat. area 244-32, with reported sale of 5,228 sockeye salmon sold, resulting in a gross income of about \$48,880 dollars. By way of comparison, this puts those commercial fishing permits far above the average gross income of other purse seine, set gillnet, and drift gillnet salmon fisheries across all fisheries in Alaska in 2024. Kodiak purse seine 2024-\$102,178 dollars. PWS Purse Seine 2024 - \$42,500 dollars. Area M Purse Seine-\$119,395 dollars, Area M Drift Gillnet-\$59,605 dollars. UCI Drift-\$32,375 dollars., UCI ESSN set gillnet-\$0.00 dollars. Commercial UCI set beach seines have order of magnitude lower overhead expenses than any other fishery noted above. The only overhead costs known from the two permits fished are Permit 01 are a one-time cost of net \$6,000 dollars for commercially built net. Permit 03, reported overhead one-time cost of \$1,800 dollars for a self his built net. Costs of fisheries observer, fuel crew, and incidentals costs have not been shared and are unknown. Proposal 192 would establish a highly profitable and highly exclusive commercial salmon fishery in UCI. Proposal 192 would preclude participation from at least 90 percent of the current ESSN set gillnetters and create an entirely fishery that would mostly disproportionately benefit only beach set gillnet sites in statistical area 244-41, 244-42, 244-31 and 244-32.

I will note here that CFEC published in 2022 “Findings from a Modified Optimum Numbers Study on the Cook Inlet East Side Set Gillnet Fishery.” CFEC Report Number 22-03N. (pg.30.) “Through analysis the August 2022 survey, CFEC determined the average desired *minimum* net income per permit from the ESSN fleet: **\$14,842**. This was based on the response of 44 group leaders representing 166 permits total, or approximately 40% of ESSN permits, and in response to the question- *In order to consider your operation viable as a Cook Inlet set gillnet operator on the East Side, how much money do you need to make annually after accounting for your annual costs?*”

DATA GATHERING

The 2024 commissioners permit required a highly credentialed fishery observer paid at permittees expense to be at the site at all time documenting in detail the date, times, and duration of net deployment and retrieval, wind speed and direction, stage of tide, number and species of fish caught, number, condition, and size of fish captured and released on ADFG provided data sheets and a detailed end of season written summery from the permittees. This detailed report was provided to the Board as RC005 when meeting on ACR 8 in October 2024.

Proposal 192 requires only in 5AAC 21.382 that under (H) number of any king or coho salmon that are released must be recorded on a ADFG fish ticket under disposition code for release;

None of the detailed data gathering and reporting that was required with the 2024 commissioner's permits is mandated with Proposal 192 and fish ticket recording is an opaque and not exactly a very robust, public, or open way of gathering and sharing whatever data may be data gleaned from the fishery in 2026.

THE BOARD OF FISHERIES PROCESS

From the very beginning of this process has been out of the ordinary, exclusionary, and hurried. Commissioner's permits were issued through a private process, the ensuing out of cycle ACR BOF hearings, RCs submitted late in the process, Board Generated Proposals, no formal prior proposal but forward, and no local Advisory Committee hearings. This has caused a lot of confusion, mistrust, suspicion, misunderstanding, and resentment among the UCI ESSN fishermen and families. This confused process was especially increased when RC 177 was submitted on the last day of the out of cycle at March 21, 2026 Board meeting far away in Anchorage and BGP 192 was passed with no public testimony by the board in the final hour of that meeting. This process has been far afield of the stated mission and policies of the Board:

“Alaska's process for enacting fish and wildlife regulations is an outstanding example of an open public process. The structure ensures that a wide range of needs and values are addressed through a high level of public involvement and scrutiny. In addition, the administrative framework helps ensure that pressures from specific interest groups do not influence the departments' job to sustainably management fish and wildlife.”

ALTERNITIVE SELECTIVE FISHING GEAR IN UCI ESSN FISHERY

An alternative selective fishing gear type is already available to UCI ESSN fishery permit holders, commercial fishing dip-nets. Alternative commercial dip-nets were presented as an alternative selective gear type and approved after a formal proposal was submitted to the local Advisory Committees and the Board, and was been reviewed by and approved by CFEC. The dip net fishery is working as a selective gear type and should be the only legal gear type allowed in the fishery until the Kenai River Late King Salmon Stock of Management Concern is no longer in place.

If a future UCI ESSN set beach seine test fishery is to go forward at all it should be done with state of Alaska allocated funding, as was done with the 2023 Katama net depth study, in all ESSN statistical areas for multiple days in multiple years with intensive scientific review of identification of separate genetic stocks, sex, size at age, and post release mortality data available to the public, and considered in the regular BOF hearing cycle.

Thank you for your consideration

Jim McGrath

Name: Susan Hermansen-Jent

Community of Residence: Humpy Point, South Cohoe

Alaska Board of Fisheries,

Regarding Proposal 192

I am writing on behalf of my family, longtime participants in the Cook Inlet Commercial Set Net Fishery at Humpy Point, South Cohoe Alaska.

We have experienced the full evolution of this industry—from the era of fish traps to individual set net sites and the implementation of the Limited Entry Act. To go from fishing five days a week to facing no season openings at all is disheartening. It is painful to witness the decline of a multigenerational way of life that now feels like a mere footnote in history.

As for Proposal 192, specifically Section A, which seeks to replace commercial set gillnetting with beach seine gear, WE FIRMLY OPPOSE. This sweeping change threatens both our livelihoods and our local fishing heritage.

Furthermore, we are deeply concerned about the significant startup expenses required for this transition. A \$5,000+ investment in beach seine gear alone is a heavy burden, especially since we already maintain beach sites, tractors, vehicle fleets, boats, and nets, along with the cost of required permits, buoy stickers, shore leases and boat registration fees. Furthermore we have no assurance that beach seining our portion of Humpy Point would be feasible or profitable. This uncertainty is heightened by the fact that the "14,250 large king salmon" escapement threshold hasn't triggered a single opening from June 20 to July 31 in the last three seasons. Data suggests this investment is more likely to sit idle than pay off—an unsustainable fiscal risk for most set netters. While this proposal aims for a complete replacement, beach seining is not a viable solution for every permit holder. We urge you to consider the impact on families like ours and maintain the established gillnet fishery.

Sincerely,

Susan Hermansen-Jent

Humpy Point, S Cohoe


Anchorage , Alaska 99516

FOOTNOTE:

The Key Factors

The proposal originally brought forward by local set netters to provide economic relief during king salmon conservation closures has become a flashpoint for several conflicting interests:

* Fear of Full Replacement: Opponents are concerned that beach seining would eventually lead to a total ban and replacement of set nets.

* Scientific Uncertainty: There is a lack of data proving that king salmon caught in beach seines would survive after being released.

* Limited Participation: Concerns have been raised that beach seining would benefit only a few individuals, thereby reducing overall community

Name: Mike Adams

Community of Residence: Cooper Landing

Proposal 192

I am writing today to oppose proposal 192 for the following reasons:

This proposal is out of cycle and I believe it should be addressed during the Upper Cook Inlet Board meeting when all of those affected will be present. Many users and community members may not be aware that management decisions about Upper Cook Inlet waters are being made at this special meeting. Others will likely be unable to adjust their schedules at the last minute to make time for comments and/or to attend this meeting. Many stakeholders will therefore not be involved in the process.

This proposal presents conservation concerns. There is limited data on the implementation of beach seines in this area. How many Kings can we forecast to be intercepted in the seine nets? What is the mortality rate for kings that are intercepted? There is a wide latitude of real world scenarios in which intercepted fish may be subjected to a wide range of detrimental conditions and how individual permit holders actually use this gear type will likely play a significant role in mortality on release. This is a new gear type that not all set net permit holders have experience with. This will likely lead to a further increase in mortality rates for intercepted kings. The Kenai River King Salmon Stock of Concern Management plan has been in place for 2 years. During that time we have finally seen kings return to the Kenai River in large enough numbers to reach the lower escapement goal in 2025. I don't think we should change such a critical component of the management plan now, when it seems to be working to allow king escapement after so many prior years of very poor king returns. Only those set net permit holders with beach seine gear will be able to participate in the beach seine fishery. This will disproportionately affect the other permit holders.

Thank you for taking the time to consider my comments on proposal 192.

Name: Dan Breeden
Bristol Bay Native Association

Community of Residence: Bristol Bay

Please "See Attached."

Comments on Proposal 189, 5 AAC 96.6XX, New Section, Board of Fisheries Policy on Traditional Knowledge
Position: Support with amendments. BBNA supports the recognition of Traditional Knowledge in Board of Fisheries decision-making, but does not support adoption of Proposal 189 as written unless the proposed regulation is revised to remove ambiguity, define key terms, and establish clear procedures for implementation.

BRISTOL BAY NATIVE ASSOCIATION
P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257



- Aleknagik*
- Chignik Bay*
- Chignik Lagoon*
- Chignik Lake*
- Clarks Point*
- Curyung*
- Egegik*
- Ekuk*
- Ekwok*
- Igiugig*
- Iliamna*
- Ivanof Bay*
- Kanatak*
- King Salmon*
- Kokhanok*
- Koliganek*
- Levelock*
- Manokotak*
- Naknek*
- New Stuyahok*
- Newhalen*
- Nondalton*
- Pedro Bay*
- Perryville*
- Pilot Point*
- Port Heiden*
- Portage Creek*
- South Naknek*
- Togiak*
- Twin Hills*
- Ugashik*

April 27, 2026

Bristol Bay Native Association Comments on Proposal 189

Proposal 189, 5 AAC 96.6XX, New Section, Board of Fisheries Policy on Traditional Knowledge

Submitted to	Alaska Board of Fisheries
Submitted by	Bristol Bay Native Association
Proposal	Proposal 189, 5 AAC 96.6XX, New Section, Board of Fisheries Policy on Traditional Knowledge
Position	Support with amendments. BBNA supports the recognition of Traditional Knowledge in Board of Fisheries decision-making, but does not support adoption of Proposal 189 as written unless the proposed regulation is revised to remove ambiguity, define key terms, and establish clear procedures for implementation.

Introduction

Bristol Bay Native Association (BBNA) submits these comments to the Alaska Board of Fisheries on Proposal 189, 5 AAC 96.6XX, New Section, Board of Fisheries Policy on Traditional Knowledge.

BBNA supports keeping Traditional Knowledge in the Board of Fisheries process. Traditional Knowledge can provide useful fishery history, local context, and information that may help the Board understand areas, fisheries, and resource issues that Board members may not know firsthand.

BBNA does not support adoption of Proposal 189 as a regulation unless the proposed regulatory language is revised to remove ambiguity and establish clear, enforceable standards. The regulation should define the key terms, establish the nomination and review process, identify the role of affected Advisory Committees, and protect sensitive Traditional Knowledge. These standards should be included in the regulation itself, or in

formally adopted procedures tied to the regulation, so the process is not left to informal practice, subjective interpretation, or inconsistent application by future Boards or Board chairs.

Requested Action

BBNA requests that the Board amend Proposal 189 before adoption. The Board should amend Proposal 189 to:

1. Clearly define Traditional Knowledge and Local Knowledge;
2. Explain who decides whether information is Traditional Knowledge, Local Knowledge, or regular public testimony;
3. Clarify who may nominate or recognize a Traditional Knowledge holder;
4. Require a process to verify or document that a person is authorized or nominated by the community, tribe, or organization they claim to represent;
5. Provide affected Advisory Committees and local communities notice and an opportunity to respond where practicable;
6. Avoid blocking participation only because an Advisory Committee did not meet or timing made Advisory Committee review impossible;
7. Protect sensitive Traditional Knowledge from exploitation or forced disclosure;
8. Allow reasonable flexibility in presentation format and time where needed; and
9. Include enough guardrails so the process remains useful without becoming a second public-comment pathway for ordinary user testimony.
- 10.

1. Proposal 189 should not be adopted word-for-word without clearer definitions.

Proposal 189 uses terms that need clarification before becoming regulation. These include "Traditional Knowledge," "Local Knowledge," "community," "organization," "recognized," "nominated," "Traditional Knowledge holder," and "local knowledge expert."

BBNA is concerned that the definitions are too broad. If the terms are not defined more clearly, the Board, future chairs, future Board members, Advisory Committees, tribes, organizations, and members of the public may apply the rule differently.

The Board should define these terms before adoption or adopt formal procedures with the regulation that explain how those terms will be applied.

2. Traditional Knowledge should be kept separate from Local Knowledge and ordinary public testimony.

Traditional Knowledge should remain distinct from Local Knowledge. The proposal itself treats those terms differently, but the distinction should be clearer in the regulation.

Local Knowledge may be valuable to the Board, but it can be broad. It can include current observations, fishery experience, user knowledge, and information from people living, working, harvesting, processing, guiding, fishing, or otherwise participating in a fishery.

That information should continue to be received through regular Board processes, including written comments, public testimony, record copies, Advisory Committee meetings and recommendations, and Board committee processes.

The Traditional Knowledge process should not become a second public-comment lane for Local Knowledge, current fishery observations, user testimony, or proposal advocacy.

3. Traditional Knowledge reports should not be used as proposal advocacy.

BBNA understands that Traditional Knowledge may provide information that is relevant to a proposal. However, Traditional Knowledge reports should not be used as an additional opportunity to support or oppose a proposal.

Support, opposition, and policy advocacy should remain in regular public testimony, written comments, record copies, Advisory Committee recommendations, and other ordinary Board procedures.

The regulation should say clearly that Traditional Knowledge reports are for Traditional Knowledge, not for proposal advocacy or ordinary user testimony.

4. The nomination language is too broad unless clarified.

Proposal 189 allows Traditional Knowledge holders to be recognized and nominated by a community, tribe, or organization whose interests include conservation, protection, restoration, or enhancement of fishery resources.

BBNA is concerned that this language is too broad as written. Without clarification, a person or organization that does not actually hold or represent Traditional Knowledge could attempt to use the Traditional Knowledge process. Organizations or user groups could use the process to support a position under the label of Traditional Knowledge.

The regulation should require a clear connection between the Traditional Knowledge holder, the nominating community, tribe, or organization, the fishery, place, species, or subject matter, and the Traditional Knowledge being presented.

A general interest in fishery conservation, protection, restoration, enhancement, or other fishery use should not be enough by itself to qualify a person to present as a Traditional Knowledge holder.

5. The Board should require verification or documentation of authority.

BBNA is concerned that Proposal 189 does not clearly state who checks whether a person is actually authorized by the community, tribe, or organization they claim to represent.

The regulation should answer that question. If a person signs up as a Traditional Knowledge holder nominated or recognized by a community, tribe, or organization, the Board should require documentation, written nomination, written authorization, or another clear verification method.

That documentation should identify the person providing the Traditional Knowledge report, the community, tribe, or organization recognizing or nominating the person, the fishery, place, species, or subject matter involved, and the scope of the Traditional Knowledge report.

6. The Board should not rely on self-identification alone.

The Board should identify who reviews Traditional Knowledge sign-ups. The regulation should state who reviews Traditional Knowledge sign-ups and what criteria are used.

BBNA is concerned that the process cannot depend only on informal practice or the discretion of a particular Board ~~chair~~.

Because Proposal 189 would become regulation, the rule should be clear enough to apply consistently after Board membership or Board leadership changes.

The regulation or written procedures should explain who reviews Traditional Knowledge sign-ups, what information must be submitted, what criteria are used, when review occurs, how late requests are handled, and how disputes or questions about eligibility are resolved.

7. Affected Advisory Committees and local communities should receive notice where practicable.

Advisory Committees are part of the Board of Fisheries process and operate at the local level. BBNA is concerned that if Traditional Knowledge is presented directly to the Board without notice to the affected local area, Advisory Committees and local participants may not have a fair opportunity to receive, consider, support, or respond to that information.

BBNA recommends that, where practicable, accepted Traditional Knowledge sign-ups, subject-matter summaries, and authorization or nomination materials be shared with affected Advisory Committees and affected local communities before Board deliberations.

This should not be an absolute barrier to participation. A tribe, community, or knowledge holder should not be prevented from presenting Traditional Knowledge only because an Advisory Committee did not meet or timing made Advisory Committee review impossible.

The goal should be local notice and opportunity to respond where practicable, not a rigid procedural bar.

8. Guardrails are needed so the process is not misused.

The Traditional Knowledge process can be useful, but it can also be misused if there are no sideboards.

Without clear definitions, verification, and review, the process could allow people to claim Traditional Knowledge when they are actually presenting Local Knowledge, user testimony, or advocacy. It could also allow organizations to use the Traditional Knowledge process to gain additional time or influence outside the normal comment process.

The Board should add guardrails that prevent misuse while still allowing real Traditional Knowledge to be heard.

9. Sensitive Traditional Knowledge should be protected.

BBNA is concerned that Traditional Knowledge can be exploited if sensitive information is placed into a public record. This may include information about harvest areas, locations, timing, practices, family knowledge, or other sensitive information.

The regulation should state that sharing Traditional Knowledge is voluntary. Nothing in the regulation should require disclosure of sensitive, confidential, sacred, culturally restricted, or location-specific information.

The Board should allow knowledge holders to provide summaries, generalized descriptions, maps without precise locations, written reports, recorded statements, audio, video, translated testimony, or other appropriate formats. A decision not to disclose sensitive Traditional Knowledge should not be treated as a lack of knowledge.

10. Time limits and presentation formats should be flexible enough to make the process work.

Proposal 189 includes a ten-minute allowance. BBNA understands the Board's need to manage meeting time.

However, Traditional Knowledge may involve, translation, history, cultural context, long-term fishery knowledge, and information that cannot always be fully shared in a short oral presentation. The amount of time available may also change depending on how many people sign up.

The Board should allow reasonable flexibility in time and format. This may include written reports, recorded statements, audio, video, translated statements, summaries, and other materials submitted into the record. The Board should consider reasonable additional time where needed, translation, or complex Traditional Knowledge reports.

This flexibility should be tied to Traditional Knowledge and should not create a broad additional time category for Local Knowledge, user testimony, or proposal advocacy.

11. The process should remain workable.

BBNA recommends guardrails, but the process should not become so rigid that it blocks Traditional Knowledge from being heard.

The Board should not prevent a tribe, community, or knowledge holder from participating only because a local process was missed or an Advisory Committee did not meet.

The Board should create a balanced process: clear enough to prevent misuse, flexible enough to allow real Traditional Knowledge to be presented, and protective enough to avoid exploitation of sensitive information.

Recommended Amendments

BBNA recommends that Proposal 189 be amended to include the following:

1. State that the Traditional Knowledge report process is for Traditional Knowledge only.
2. State that Local Knowledge, user knowledge, current fishery observations, and proposal advocacy belong in regular Board processes.
3. Define Traditional Knowledge and Local Knowledge more clearly.
4. Clarify that ordinary user experience is not Traditional Knowledge merely because a person has experience in a fishery.
5. Clarify who may nominate or recognize a Traditional Knowledge holder.
6. Require a clear connection between the knowledge holder, nominating entity, fishery, place, species, and Traditional Knowledge being presented.
7. Require documentation, written nomination, written authorization, or another clear verification method when a person claims to speak as a Traditional Knowledge holder for a community, tribe, or organization.
8. Identify who reviews Traditional Knowledge sign-ups and what criteria are used.
9. Explain how late requests, disputes, or eligibility questions will be handled.
10. Provide affected Advisory Committees and local communities notice and an opportunity to respond where practicable.
11. Do not make Advisory Committee review an absolute bar to participation when timing or logistics make review impossible.
12. Protect sensitive, confidential, sacred, culturally restricted, or location-specific Traditional Knowledge from forced disclosure.
13. Allow summaries, generalized descriptions, written reports, recordings, audio, video, translated statements, and other appropriate presentation formats.
14. Allow reasonable flexibility in time limits where needed for elders, translation, or complex Traditional Knowledge reports.
15. State that Traditional Knowledge reports are not a time to advocate for or against a proposal.
16. Maintain a clear record of how Traditional Knowledge reports were accepted, reviewed, and considered.

Conclusion

BBNA supports keeping Traditional Knowledge in the Board of Fisheries process. The process can be useful and can help the Board understand fishery history, local context, and information that may not be captured through ordinary proposal testimony.

However, Proposal 189 should not be adopted as written. The Board should clarify definitions, separate Traditional Knowledge from Local Knowledge and ordinary public testimony, verify who is authorized to present Traditional Knowledge, provide affected

Advisory Committees and local communities notice where practicable, protect sensitive knowledge, and allow flexible presentation formats.

With those amendments, Proposal 189 can keep Traditional Knowledge in the Board process while reducing the risk of confusion, misuse, unfairness, or inconsistent application.

Thank you for your consideration,

Dan Breeden

President & CEO
Bristol Bay Native Association

Dear Alaska Board of Fish and Game,

4/27/2026

I strongly oppose Proposal 192 and the replacement of set gillnets with set beach seines in the Upper Subdistrict. While the intent to reduce king salmon mortality is understandable, this proposal overlooks critical, practical realities that make a seine-based fishery both inefficient and, in many locations, nearly unworkable.

First, the issue of location cannot be overstated. The existing set gillnet sites were established and proven over decades based on tidal flow, beach slope, substrate, and fish migration patterns. These sites are not universally compatible with beach seine operations. Many areas in the Upper Subdistrict have uneven bottoms, strong currents, and soft or obstructed shorelines that make the effective deployment and retrieval of a seine extremely difficult. What works for a drift or gillnet fishery does not automatically translate into a viable seine fishery.

Second, the discrepancy in materials and infrastructure required is significant. Set gillnet operations are relatively straightforward and rely on gear that fishermen already own, maintain, and understand. Transitioning to a beach seine fishery would require substantial new investment in nets, lines, anchoring systems, and potentially additional labor and vessels. This is not a simple gear swap—it represents the creation of an entirely new fishery model. Expecting permit holders to absorb these costs without clear evidence of economic viability is unreasonable.

Most importantly, the proposal fails to adequately address the persistent and severe issue of seaweed. The Upper Subdistrict is well known for heavy weed loads specifically near the mouth of the Ninilchik River, particularly during the proposed fishing period. Set gillnets already contend with this challenge, but beach seines would amplify the problem dramatically. Seines function by encircling and hauling everything in their path; in these waters, that would mean overwhelming quantities of seaweed. This would make sets excessively heavy, difficult to retrieve, and potentially unsafe to operate. In many cases, the volume of seaweed alone would render fishing impractical, if not impossible, regardless of fish presence.

Additionally, the handling requirements associated with seines—especially with mandatory live release of king and coho salmon—become far more complicated when nets are clogged with vegetation. Fish survival rates may not improve under these conditions, undermining one of the central goals of the proposal.

In summary, Proposal 192 attempts to impose a one-size-fits-all solution on a highly variable and challenging fishery. It underestimates the importance of site-specific conditions, ignores the financial burden of transitioning to entirely new gear, and fails to realistically account for the overwhelming impact of seaweed in the Upper Subdistrict. For many permit holders, this would not be a modification of their operation—it would effectively eliminate their ability to fish.

For these reasons, I strongly urge rejection of this proposal.

Gary Deiman & Kelsey Deiman-Szymanski

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Gary Deiman & Kelsey Deiman-Szymanski

Name: Marilyn Wilson

Community of Residence: Kenai, Alaska

I oppose proposal 192 this is reallocation of the fishery taking out all outside gear leaving only a few select beach sites to fish. This is not the way to a solution. This is a way for the state to eliminate a whole fishery without the input from 80% of the permit holders. This was being snuck in by a handful of permit holders with beach sites with no regards to the majority. This proposal should have never been moved forward by the board until 2027!

Name: Andrew Umlauf

Community of Residence: SHORELINE

I am writing today in opposition of proposal 192. Public process has not been followed or allowed and it seems 192 violates CFEC rules. Replacing set nets with beach seines and allowing no public testimony, put forth in a sneaky way at the end of a misc. finfish meeting is morally wrong. These kind of acts by the board violates public trust. Please reject this proposal or delay it to the regular UCI meeting next year where due process can be followed.

Name: Melissa Good

Community of Residence: Kodiak

To the Alaska Board of Fisheries members,

I am writing to express my strong opposition to Proposal 192. I grew up setnetting just north of the Ninilchik River. My childhood revolved around our fish camp each summer, and setnetting paid my way through both undergraduate and graduate school. My family has worked that site since fish traps were outlawed. Despite continued strong sockeye salmon returns, setnetting is no longer a viable way to earn a living for many small family operations located between the Ninilchik and Kenai Rivers. With my long-standing experience fishing in this area, I can say with certainty that the transition to beach seine gear outlined in this proposal would be both technically unworkable and economically devastating for setnet families and communities throughout Upper Cook Inlet.

First and foremost, the environmental conditions at the Ninilchik sites—including those farther north—make beach seining impractical. As longtime fishers in this area know, loose seaweed loads moving with the tides are immense and come daily. Unattended setnets can quickly sink and drag, fouled with seaweed, rendering them ineffective. Operating a beach seine under these conditions would be extraordinarily difficult, if not impossible, and would not yield a catch.

Furthermore, the safety risks of this proposal cannot be overstated. Cook Inlet has one of the largest tidal ranges in the world. Requiring fishers to manually operate, deploy, and retrieve heavy beach seine gear—often with machinery—along the immediate tideline in these conditions creates significant hazards. The speed and power of the incoming tide in the Upper Subdistrict make the shore-based maneuvers required by this proposal inherently dangerous.

The economic reality also makes this supposed "opportunity" unrealistic. After years of closures and significant financial hardship, asking setnetters to invest tens of thousands of dollars in new beach seine gear, vessels, and heavy equipment is simply not feasible. Most permit holders are already struggling to maintain their existing operations. They do not have the capital for a forced gear conversion, particularly one that would likely see limited use under the restrictive king salmon escapement thresholds.

In addition, Proposal 192 ignores the broader salmon management picture. In recent years, both the Kasilof River and the Kenai River have frequently experienced substantial sockeye salmon over-escapement. While escapement goals are designed to maximize sustained yield, repeatedly exceeding those goals can reduce future production through density-dependent effects, increased competition for spawning habitat, and reduced juvenile survival. The East Side Setnet Fishery has historically played a critical role in managing these abundant sockeye runs and preventing chronic over-escapement. Restricting or effectively eliminating this fishery would further reduce managers' ability to harvest surplus sockeye salmon when returns are strong, ultimately harming both the resource and the communities that depend on it.

Finally, the requirement that fishing occur on a Shore Fishery Lease would exclude a significant number of fishing families. Many setnetters in our area do not hold these leases and instead operate offshore lease sites. Proposal 192 would effectively disenfranchise these permit holders overnight.

Proposal 192 is not a viable solution under the Kenai River King Salmon Stock of Concern Management Plan. It is technically impractical, economically destructive, and would undermine effective management of Upper Cook Inlet sockeye salmon. I strongly urge the Board to reject this proposal.

Sincerely,

Melissa Good

Name: Gavin Hudkins

Community of Residence: Kenai

To the Board,

I support the intent of Proposal 192, especially allowing set beach seining as an additional tool during the Stock of Concern (SOC) plan.

However, I do not support replacing traditional set netting with set beach seining. Set netting has long been an important part of this fishery and should remain available when runs allow.

Set beach seining should be used as a supplemental option, not a replacement. A multi-gear approach gives managers more flexibility while balancing conservation and opportunity.

Thank you for your consideration.

Gavin Hudkins

Name: Michael Jones
The Organized Village of Kasaan

Community of Residence: Kasaan, AK

In support of Proposal 189 because considering Traditional Knowledge and Local knowledge to its regulations.



April 28, 2026

Via E-Mail and Online Portal
Märit Carlson-Van Dort
Chair, Alaska Board of Fisheries
marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

The Organized Village of Kasaan is writing in support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making and is something the Native community has sought for years. In 2023, AFN's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges

cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, the Organized Village of Kasaan supported the Board's development of its Policy on Traditional Knowledge in 2024 and now supports Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Jones", written in a cursive style.

Michael Sajúu júu Jones

Name: Jason Hudkins

Community of Residence: Kenai

To the Board,

I am writing in support of the intent of Proposal 192, particularly the inclusion of set beach seining as another tool that could be used during times when the Stock of Concern (SOC) plan is in effect. I believe this method offers potential benefits as a live-release fishery and can help provide sockeye harvest opportunity while continuing to focus on king salmon conservation.

That said, I do not support the idea of using set beach seining as a replacement for the traditional set net fishery. Set netting has been an important part of this fishery for many years and continues to be a valuable management option when runs are strong enough to allow access.

I believe there is room for both conservation and opportunity. Set beach seining can serve as an additional tool during restrictive times, but it should complement existing gear types rather than replace them. Maintaining multiple management options gives the Board and managers more flexibility as salmon returns change from year to year.

Please consider an approach that protects king salmon while also preserving the fishing traditions, access, and livelihoods tied to this fishery.

Thank you for your time and consideration.

Jason Hudkins

S04H Permit Holder

30 year participant in the ESSN fishery

Father of 4th generation ESSN Children

Grandfather of 5th generation Grand Children

Ahtna Tene Nene Comment in Support of Proposal 189

Ahtna Tene Nene supports Proposal 189 because it recognizes the longstanding stewardship of Alaska Native peoples and affirms the legitimacy of their knowledge systems. Traditional Knowledge is not anecdotal; it is a rigorous, time-tested way of understanding ecosystems, built through continuous observation and lived experience over many generations. Embedding this policy in regulation helps correct historical imbalances in whose knowledge is treated as “valid” within fisheries management.

Sustainable fisheries management requires long-term perspectives. Traditional Knowledge provides insight into ecological patterns, species behavior, and environmental change across time scales far longer than most scientific datasets. Incorporating this knowledge enables the Board to detect trends earlier, understand variability more deeply, and avoid management decisions that overlook local realities. Proposal 189 is a proactive step toward safeguarding Alaska’s fisheries for future generations.

This policy also strengthens community engagement and encourages broader participation in the Board process. Many Traditional Knowledge holders have historically been excluded due to structural barriers such as limited time, travel costs, or unfamiliarity with formal testimony formats. By explicitly inviting and recognizing these knowledge systems, the Board signals that community experience matters. This will foster richer dialogue, more inclusive decision-making, and stronger relationships between the Board and the people who depend on Alaska’s fisheries.

For these reasons, Ahtna Tene Nene urges the Board to adopt Proposal 189.

Name: HARRY LEMAN

Community of Residence: NINILCHIK

NO !! on prop 192

More data...needed.

Live face to face testimony give and take needed before you try to ram this through.

OUT OF CYCLE !!

NO REASON to rush this through through this year...

WAIT to revisit IN CYCLE.

As a LIFELONG SETNETTER with sites approximately 9 miles north of NINILCHIK, Grandfathered in with a beach net location that dates back to PRE-STATEHOOD at my father's last COMMERCIAL FISHTRAP location, I can tell this AREA is NOT CONDUCIVE to beach seining with many problems such as ROCK PILES...SEAWEED, KELP, STICKS & LOGS floating through, any given tide...with problems of access to the beach, NO NAVIGABLE BEACH AT HIGH TIDE.

Coupled with the COST \$\$\$ of NEW TYPE OF GEAR, EQUIPMENT (LOADERS, SKIDDERS, TRACTORS, etc. MAKE THIS 'BOONDOGGLE' of a NEW VIRTUALLY UNTESTED FISHERY UN-DOABLE !!

Not to mention it DIS-ENFRANCHISES the MAJORITY of the 440ish ESSN PERMIT HOLDERS.

PLEASE, GO BACK TO THE DRAWING BOARD, LISTEN TO ALL THE SETNETTERS, IN ALL THE DIFFERENT AREAS AND VOTE DOWN THIS PROPOSAL !!!

My Setnet Sites are at the exact location of my Father's last FISHTRAP from 1958.

Consider alternate ideas.

Such as 'Co-Op' FISHTRAPS, which would be the easiest, most effective way to separate the species...the few KINGS CAUGHT IN A FISHTRAP CAN BE SAFELY RELEASED UNHARMED...and SOCKEYE RETAINED and thus, OVER-ESCAPEMENT CONTROLLED.

BACK to the DRAWING BOARD...CONSIDER DESIGNING and ALLOWING FISH WHEELS ATTACHED BETWEEN BOUYS OF EXISTING SET NET LOCATIONS, there by LETTING ALL SETNETTERS FISH AGAIN.

The BIGGEST PROBLEM IN THE KENAI, BIOLOGICALLY, IS OVER-ESCAPEMENT OF SOCKEYE !!

My FAMILY SETNET FISHING BUISINESS DATES BACK 100+ YEARS...and you SEEM HELL-BENT ON DESTROYING IT...And Can You Explain WHY ??

VOTE NO ON PROP 192 !!

and

GO BACK TO THE DRAWING BOARD !!

..

Name: Dan Norman

Community of Residence: Soldotna

I strongly oppose proposal 192 as written. It goes against everything the Board of Fisheries public process works. It also fails multiple components of the the sustainable salmon policy and the Alaska Constitution. I think the current SOC action plan worked well as implemented in 2025. I believe we now have a baseline for chinook harvest during the incredibly limited time and gear found within the SOC plan. A harvest of 6 large chinook and likely only 4 Kenai bound is an incredible success. the personal use dip net fishery averages 23 harvested since being a prohibited species and has an unknown mortality. The in river sockeye sport fishery has an estimated 18 large chinook mortality. The burden of conservation has been unfairly shouldered by one user group and it speaks to the larger agenda outside of conservation.

I do support beach seines as an ALTERNATE gear that should be written in as a new section (6) in the SOC plan rather than an elimination of set nets. I participated as crew in 2024 experiment and see the potential of beach seines, but it is far from the solution to the chinook decline. especially considering the known mortality that is higher in all the other user groups.

ALASKA BOARD OF FISHERIES

2026 Special Meeting — Upper Cook Inlet

Written Testimony in Opposition to Proposal 192 As Written

To:	Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries
From:	Daniel Norman
Date:	April 2026
Re:	Opposition to Proposal 192 As Written — Preservation of Set Gill Nets

I. Opening Statement

I respectfully submit this testimony in opposition to Proposal 192 as written. I support beach seines as an alternative gear type and have actively participated in the research and regulatory development of that gear method since the Commissioner's Permit experiments in 2024. This testimony is not opposition to beach seining. It is opposition to a proposal that, as written, eliminates all fishing opportunity during the SOC plan period for **361 of the 408 SO4H permit holders** in the ESSN fishery — **88.5% of the fleet** whose offshore lease sites make beach seining physically impossible regardless of willingness, capital investment, or operational expertise.

Proposal 192 is not a gear alternative. For 88.5% of this permit holder class, it is a complete closure. It eliminates the last net available to permit holders who have already absorbed more than a decade of progressive board-imposed gear reductions. We see that reductions adopted in 2024 gained data in 2025 to show achievement of their conservation purpose. The Board should not adopt a proposal that permanently locks out the overwhelming majority of a permit holder class based on lease site geography rather than fishing behavior or documented conservation impact.

II. A Decade of Gear Reduction and the Reality of Proposal 192

A. The Full Regulatory History of ESSN Gear Restrictions

The ESSN fishery has been subject to continuous, incremental regulatory restriction since 1976. The following timeline documents every significant gear and access reduction imposed by this Board, from the original seasonal framework through the SOC plan in effect today. This record is the essential context for evaluating whether Proposal 192, which would eliminate the remaining single net for 88.5% of the fleet, is proportionate to the documented conservation need.

Year	Board Action / Regulatory Change	Effect on ESSN Permit Holders
1976	King Salmon Plan: established 1:1 sport-to-commercial Chinook harvest ratio for late-run Kenai kings on ESSN beaches. Fishery	First direct Chinook constraint on the ESSN fleet. Commercial fishing tied to sport fish performance.

	closed if sport harvest exceeded commercial by 10%.	
1978	BOF institutes Upper Cook Inlet Salmon Management Plan. Commercial season set at June 25 – August 15.	Formal seasonal boundaries established. Full season access for the ESSN fleet under the umbrella plan.
1984	Opening date for ESSN in Kenai, Salmatof, and East Forelands sections moved from June 25 to July 1 to allow Chinook passage.	One week of early-season access eliminated in three sections. Early-returning Chinook passage protected at cost of early sockeye harvest.
1993	Area Registration requirement adopted for ESSN permits. Buoy stickers required on each net.	Increased administrative and compliance burden. Gear identification formalized.
1997	Opening date shifted from July 1 to July 8 in North K-Beach, Salmatof, and East Forelands sections. Closing date advanced from August 15 to August 10 for Kenai coho protection.	One additional week of early access eliminated (July 1–7 now closed). Five days of late-season access eliminated (Aug. 10–15 now closed).
1999	Three-tiered Kenai sockeye management plan adopted. 'Step Down' plans introduced in the Upper Cook Inlet umbrella plan.	ESSN fishing opportunity now conditional on run-strength tiers. Lower tiers restrict access in weak-return years.
2002	ESSN prohibited from fishing more than 24-hours between August 1 and August 7.	Critical late-season access narrowed. The August 1–7 window, historically important for late sockeye and pink salmon, effectively capped.
2005	August in-season windows eliminated. Season closes if daily harvest falls below 1% of cumulative sockeye harvest for two consecutive periods after August 1.	August access now subject to automatic closure trigger. Unpredictability increased for late-season operations.
2008	Closing date restored to August 15 for pink salmon harvest under Pink Salmon Management Plan. No-fishing zone within 600 feet of shore added during pink salmon periods.	Late-season access partially restored for pinks, but with new spatial restriction.
2011	Drift fishery decoupled from ESSN fishery. Stacking of two permits now subject to new restrictions.	ESSN operators who held two permits and stacked gear at multiple sites faced new limits on that practice.
2012	UCI BOF Task Force formed in response to low Chinook abundance and fishery closures. Mission: identify adjustments to balance setnet opportunity with Chinook escapement goals.	Formal process acknowledging that Chinook abundance is the controlling variable for ESSN access. Beginning of sustained restriction cycle.
2024	BOF Upper Cook Inlet Meeting: Kenai River Late-Run Chinook Salmon Stock of Concern (SOC) Management Plan adopted. SOC plan	

	restricts ESSN access to limited periods when 14,250 large Chinook are projected. Gear restricted to 1 net per permit, 29 meshes deep, 8-hour tide-centered openers. Stacking PROHIBITED.	
2025	SOC plan in effect. ESSN closed preseason. Two 8-hour openers authorized August 5–6 only — after recovery goal of 14,250 projected to be achieved. Result: 42,992 sockeye harvested; 6 large Chinook in the entire fleet across both openers.	82 permits made deliveries in two days — the only ESSN commercial fishing in the 2025 season.
2026 (BGP 192 as written)	Would eliminate set gillnet access during the SOC plan period entirely. Set beach seines only — meaning 361 offshore lease holders have NO access regardless of run conditions.	

B. The Progressive Reduction of ESSN Gear — Summary

The following table shows the net effect of the regulatory history above, from the ESSN fleet's historical maximum gear configuration to what a single permit holder is authorized today under the SOC plan:

Era / Status	Nets Per Permit	Mesh Depth	Stacking Allowed	Effective Gear Units (2 permits, 2 sites)
Pre-SOC Historical Full Access	3 nets	45 meshes deep	Yes — max 6 nets at 2 sites	6 nets × 45 meshes deep
Board-Imposed Reductions (Gradual)	Reduced	Cut to 29 meshes	Yes — continued at reduced depth	Declining
Current SOC Plan (In Effect Today)	1 net	29 meshes deep	PROHIBITED	1 net × 29 meshes deep
BGP 192 As Written	0 (gillnet not authorized)	N/A	N/A	ZERO — setnet eliminated entirely for 361 offshore permit holders

A permit holder who once operated **six nets at 45 meshes deep** across two shore fishery lease sites today operates **a single net at 29 meshes deep on one site**, with stacking prohibited. This is an effective reduction of more than **90% in deployed gear capacity**. Each step was accepted in good faith, with the understanding that restrictions were proportional to documented conservation need and that reasonable fishing opportunity would be preserved. Proposal 192 as written eliminates what little remains — and eliminates it for 88.5% of the fleet.

After more than a decade of accepting progressive gear reduction — from six nets at 45 meshes deep to one net at 29 meshes — 361 of 408 SO4H permit holders now face total elimination of SOC plan access under Proposal 192 as written. Their only remaining gear option is physically impossible for their lease sites. This is not a proportional reduction. It is a complete exclusion.

C. Who Proposal 192 Actually Affects

Of the 408 SO4H permit holders in the ESSN fishery, only a few dozen hold shore fishery lease sites with beach access suitable for set beach seine operations. The remaining 361 permit holders hold offshore leases. For them, beach seining is not a gear choice — it is a physical impossibility. The following table shows what Proposal 192, as written, means for each class of permit holder:

Permit Holder Class	Number of Permits	% of ESSN Fleet	Access Under Proposal 192 As Written
Shore fishery lease holders (beach sites)	47	11.5%	Full access — may fish beach seines
Offshore lease holders (no beach site)	361	88.5%	ZERO ACCESS — beach seining is physically impossible

Proposal 192 as written is not a gear alternative for 88.5% of the ESSN fleet. It is a complete elimination of all fishing opportunity during the SOC plan period for 361 permit holders whose offshore lease sites make beach seining physically impossible. This Board would be eliminating access for the overwhelming majority of a permit holder class based on lease site geography, not fishing behavior, not conservation impact, and not proportional burden.

5 AAC 39.222(c)(4)(D) — Burden of Conservation
"...the burden of conservation shall be shared among all fisheries in close proportion to each fishery's respective use, consistent with state and federal law." The 361 offshore lease holders in the ESSN fishery have borne a decade of progressive gear reduction — from six nets at 45 meshes to one net at 29 meshes, with stacking prohibited. Proposal 192 as written does not ask them to bear more. It asks them to bear everything, while the 47 beach lease holders retain access. This is not a proportional sharing of conservation burden. It is the elimination of one class of permit holder entirely.

III. Two Weeks of Collaborative Work — and a Record That Proved True

Before presenting the Chinook harvest data, I ask this Board to consider who brought this issue forward and what that user group has demonstrated in the process.

During the 2024 Upper Cook Inlet meeting, members of this user group — the permit holders who had the most to lose from any outcome — spent two weeks working collaboratively with ADF&G staff to develop the operational conditions now found in the Stock of Concern Action plan. This was not a perfunctory stakeholder process. It was a substantive, two-week technical collaboration that produced

specific, practical recommendations grounded in decades of operational knowledge of these beaches, these tides, and these fish.

Among the key recommendations brought forward by the user group and adopted by ADF&G into the Commissioner's Permit conditions:

- **Rolling tide openers.** Fishing periods timed to coincide with tidal movement rather than fixed clock windows, to maximize sockeye passage through the gear while reducing the likelihood of Chinook encounters at slack and low water.
- **Leadlines off the bottom.** Knowing that Chinook salmon run in deeper waters, we adopted an operational practice that lead lines be kept above the substrate during sets. Doing otherwise would increase the probability of Chinook interception where late-run kings concentrate at lower depths in the water column, as documented during the Kintama Study.
- **Everybody gets opportunity.** We knew that beach nets historically catch lower rates of Chinook salmon. We had an option to make the fishery a beach-only set net fishery. We, as an industry, could not stand for 88.5% of our fishing families to be eliminated from fishing opportunity.

ADF&G adopted these recommendations into the SOC action plan and we got to see just how well these measures worked in 2025. The 2025 ESSN setnet openers on August 5 and 6 were similarly timed around high tide with prescribed gear restrictions consistent with the user group's operational recommendations. The result: 6 large Chinook in 42,992 sockeye across two openers, with the SOC recovery goal achieved. Only 4 of those 6 were likely bound for the Kenai River based on ADF&G genetic stock composition studies.

The user group that had the most to lose brought forward meaningful, science-grounded operational recommendations. ADF&G adopted them. The 2024 and 2025 results validated them. **This Board should weigh that record carefully when evaluating the credibility of what this user group now asks: preserve the set gillnet as a viable option so that all 408 permit holders have reasonable opportunity within the SOC plan.**

5 AAC 39.222(c)(3)(N) — Best Available Information

"Conservation and management decisions for salmon fisheries should take into account the best available information on biological, environmental, economic, social, and resource use factors." The operational recommendations developed collaboratively by this user group and ADF&G during the 2024 UCI meeting represent exactly this kind of best available information — practical, site-specific knowledge that produced documented, quantified conservation outcomes. That knowledge base resides in the 361 offshore lease holders who have fished these beaches for decades. Proposal 192 as written eliminates their participation.

IV. The Chinook Harvest Record — What the Data Actually Show

The 2025 Upper Cook Inlet Commercial Salmon Fishery Season Summary (ADF&G, October 24, 2025) provides the definitive record of Chinook harvest across the UCI commercial fleet. The following table presents those figures alongside the seven-year average Chinook harvest from the personal use dip net fishery, with two critical adjustments applied to the ESSN setnet data: the size threshold relevant to the SOC recovery goal (large fish, ≥ 75 cm mid-eye to tail fork) and the stock composition estimate for Kenai River-bound Chinook (64%).

Fishery / Gear Type	Chinook Harvested	Est. Large Kenai R. Chinook (64% stock comp.)	As % of 2025 Escapement (15,641)
ESSN Set Gillnet — 2 Openers (Aug 5–6, 2025)7 total; 6 large (≥75 cm)	7 total — 6 large	~4 large Kenai R. fish	0.026% (large Kenai R. fish only)
Commercial Dip Net — Full Season 2025	1	—	0.006%
Personal Use Dip Net — 7-Year Average (Chinook is a PROHIBITED species)	23 avg (incidental mortality)	—	0.147%
2025 Final Escapement (Preliminary)	15,641 large fish	—	SOC Recovery Goal Achieved
Sockeye Sport Fishery	18 Large Kenai Chinook		

** Stock composition estimate of 64% Kenai River-bound Chinook applied to the 6 large fish (≥75 cm) harvested by the ESSN setnet fleet in 2025, producing an effective large Kenai River Chinook harvest of approximately 4 fish. Personal use dip net Chinook harvest represents average incidental mortality of a prohibited species over seven years.*

The data demand the Board's attention on four specific points:

- Of the 7 Chinook harvested by the ESSN setnet fleet in 2025, only 6 were large fish (≥75 cm) — the size class measured by the SOC recovery goal. Of those 6, approximately 64% were Kenai River-bound, producing an effective large Kenai River Chinook harvest of **approximately 4 fish**. Against a final escapement of 15,641 large fish, this represents 0.026% of the spawning population.
- The commercial dip net fishery harvested 1 Chinook across the entire 2025 season — 0.006% of the final escapement.
- The personal use dip net fishery has averaged 23 Chinook annually over seven years. **Chinook salmon are a prohibited species in the personal use dip net fishery.** Every one of those 23 fish represents incidental mortality of a prohibited species — fish killed in a fishery not authorized to harvest them at all. Yet this fishery, operating in the same Upper Subdistrict waters during the same July season, faces no gear restriction, no time limitation, and a blind eye. Its average annual Chinook mortality as a prohibited species is **more than five times the effective large Kenai River Chinook harvest of the entire ESSN setnet fleet in 2025.**
- The SOC recovery goal was achieved in 2025 — the first of three consecutive years required to exit the SOC plan — with setnets fishing and with this Chinook harvest record.

The Board of Fisheries is prepared to eliminate the last net available to 361 ESSN permit holders based on an effective large Kenai River Chinook harvest of approximately 4 fish in 2025, while the personal use dip net fishery — in which Chinook are a prohibited species — has averaged 23 Chinook annually in the same waters during the same season without

comparable restriction. This is a palpable disregard for the burden of conservation as required by 5 AAC 39.222(c)(4)(D).

5 AAC 39.222(c)(2)(F) — Non-Target Stock Protection
"Salmon escapement and harvest management decisions should be made in a manner that protects non-target salmon stocks or species." The 2025 data show that after size and stock composition adjustments, the ESSN setnet fleet's effective large Kenai River Chinook harvest was approximately 4 fish — 0.026% of the final escapement. That standard of incidental Chinook impact is not being applied consistently to the personal use dip net fishery, where Chinook are a prohibited species generating higher average annual mortality in the same waters. Nor is the in river sockeye sport fishery mortality considered. ADF&G has commented that a mortality of 18 large chinook are found in the in river sockeye sport fishery.

V. Predictive Analysis — A Fully Prosecuted SOC Plan Setnet Season

The SOC plan authorizes a maximum of 8 fishing periods in the Upper Subdistrict when run conditions allow: up to 6 periods in the Kenai and East Forelands Sections and up to 2 in the Kasilof Section. In 2025, only 2 of those periods were authorized. Using the per-opener averages from the 2025 data as a conservative baseline, and applying the same size and stock composition adjustments used in Section IV, the following table projects the full conservation impact of a completely prosecuted SOC plan setnet season and compares it directly to the personal use dip net fishery's seven-year average:

Scenario	Total Chinook	Large Chinook (≥75 cm)	Est. Large Kenai R. Chinook (64%)	As % of Escapement
Actual 2025 — 2 Openers Fished	7	6	~4	0.026%
Personal Use Dip Net — 7-Year Avg (prohibited species)	23	—	—	0.147%
Fully Prosecuted SOC Plan — All 8 Available Periods	~28	~24	~15	~0.096%
Incremental Impact — 6 Additional Openers Beyond 2 Fished	+~21	+~18	+~11	+~0.070%

Even if all 8 authorized periods had been fished in 2025 — a scenario that did not occur — the estimated effective large Kenai River Chinook harvest from the ESSN setnet fleet would have been approximately **15 fish**, representing roughly 0.096% of the final escapement. The incremental impact of the 6 additional openers beyond the 2 that were actually fished would have been approximately **11 additional large Kenai River Chinook** — a number that is **less than half the personal use dip net**

fishery's average annual prohibited-species Chinook mortality and less than the mortality of the in river sockeye sport fishery.

A fully prosecuted ESSN setnet season — every opening the SOC plan allows, applied to the entire 408-permit fleet — would have produced a large Kenai River Chinook harvest smaller than what the personal use dip net fishery kills as incidental bycatch of a prohibited species in an average year. This Board cannot justify eliminating setnet access for 361 permit holders on the basis of a conservation impact that does not withstand comparison to an unrestricted fishery operating in the same waters.

5 AAC 39.222(c)(5)(A)(iv) — Precautionary Approach

"Where the impact of resource use is uncertain, but likely presents a measurable risk to sustained yield, priority should be given to conserving the productive capacity of the resource." After size and stock composition adjustment, the effective large Kenai River Chinook harvest of a fully prosecuted ESSN setnet season is estimated at approximately 15 fish — less than the personal use dip net fishery's seven-year average prohibited-species Chinook mortality. The precautionary principle does not support eliminating access for 361 permit holders on this basis.

VI. What I Ask the Board to Do

I supports beach seines as an alternative gear type within the SOC plan. I supported and participated in the 2024 Commissioner's Permit experiments. We spent two weeks at the 2024 UCI meeting collaborating with ADF&G to develop the operational conditions that produced an orderly fishery resulting in single-digit Chinook salmon harvest.

What we ask is simple: do not write the 361 offshore lease holders out of the SOC plan entirely. Proposal 192 as written does exactly that. Beach seines as an additional gear option — as originally envisioned in ACR 8 and Proposal 313 — gives the 47 beach lease holders their seine option while preserving reasonable fishing opportunity for the 361 permit holders for whom the set gillnet is the only option.

Specifically, I urge the Board to:

- **Reject Proposal 192 as written** and return to the alternative-gear framework of ACR 8 and Proposal 313, which authorized beach seines as an additional gear type within the SOC plan without eliminating set gillnet access.
- **Authorize cost recovery under Commissioner's Permits** for beach seine experiments in 2026, as the Commissioner indicated may be possible once the gear type is legalized. This can be accomplished under an alternative-gear structure without eliminating setnet access for the 361 offshore lease holders.
- **Allow the current SOC plan setnet framework to continue** building the consecutive-year escapement record required to exit the plan. The 2025 escapement of 15,641 large fish achieved the recovery goal — the first of three required consecutive years — with setnets fishing. The path forward is to build on that success.
- **Credit the collaborative work this user group has already done.** The two weeks of technical collaboration at the 2024 UCI meeting, the operational recommendations that ADF&G adopted, and the results those recommendations produced are a demonstrated record of good faith and scientific contribution. The 361 offshore lease holders who cannot fish seines carry that knowledge. Eliminating their participation eliminates that resource.

VII. Questions for the Record

I respectfully request the following questions be addressed by the Commissioner or Legal Counsel during the meeting:

#	Question for the Record
1	Of the 408 SO4H permit holders in the ESSN fishery, 361 hold offshore leases and cannot physically operate beach seines. Proposal 192 as written eliminates all SOC plan fishing opportunity for these 361 permit holders. How does the Board reconcile this outcome with the burden-of-conservation requirement at 5 AAC 39.222(c)(4)(D), which requires that the burden of conservation be shared in close proportion to each fishery's use of the stock?
2	After applying the size threshold relevant to the SOC recovery goal (large fish, ≥ 75 cm) and the 64% Kenai River stock composition estimate, the effective large Kenai River Chinook harvest of the ESSN setnet fleet in 2025 was approximately 4 fish — 0.026% of the final escapement. The personal use dip net fishery, in which Chinook are a prohibited species, has averaged 23 Chinook annually in the same waters during the same season. On what scientific or legal basis does the Board conclude that an effective harvest of approximately 4 large Kenai River Chinook by the ESSN setnet fleet requires gear replacement, while 23 prohibited-species Chinook killed annually by the personal use dip net fishery requires no comparable action?
3	A predictive analysis based on 2025 per-opener data, adjusted for size and stock composition, estimates that a fully prosecuted SOC plan setnet season — all 8 authorized periods — would produce approximately 15 large Kenai River Chinook, representing 0.096% of the 2025 final escapement. This is less than the personal use dip net fishery's seven-year average prohibited-species Chinook mortality. The known harvest of chinook in the personal use dip net fishery is far above the harvest of the ESSN fishery. The dip net fishery has an unknown mortality for chinook that are released. For a fishery that once harvested as many as 1800 chinook, what is the mortality of those 1800 fish that are released? The in river sockeye sport fishery has an estimated mortality of 18 large chinook. How does the in river mortality compare to ESSN harvest? Does the Department agree with this analysis, and if not, what are the Department's own estimates?
4	The user group brought forward the rolling tide opener recommendation and the leadlines-off-the-bottom operational practice during two weeks of collaborative work at the 2024 UCI meeting. ADF&G adopted both recommendations into the Commissioner's Permit conditions. The 2025 results validated those recommendations. Will the Department confirm this record for the Board, and will the Board credit it in its deliberations on Proposal 192?
5	If the Board were to authorize beach seines as an ALTERNATIVE gear type within the SOC plan, preserving set gillnet access for the 361 offshore lease holders, would the Commissioner have authority to issue Commissioner's Permits with cost recovery authorization for beach seine experiments below the 14,250 preseason projection threshold? Would this alternative structure achieve the data collection objectives identified by the Board without eliminating the fishing access of 88.5% of the ESSN fleet?

VIII. Conclusion

The Kenai Peninsula Fishermen's Association has participated in good faith at every step of this process. We accepted a decade of progressive gear reduction — from six nets at 45 meshes deep to one net at 29 meshes deep with stacking prohibited. We spent two weeks at the 2024 UCI meeting working collaboratively with ADF&G to develop operational conditions for beach seine experiments. We supported those experiments. We accepted the results and came back to this Board asking for the alternative-gear framework those results support.

The 2025 data validated everything this user group predicted. The SOC recovery goal was achieved with setnets fishing. The effective large Kenai River Chinook harvest of the ESSN setnet fleet was **approximately 4 fish, or 0.026% of the escapement**. A fully prosecuted setnet season would have produced approximately 15 fish — less than the personal use dip net fishery averages annually as prohibited-species incidental mortality in the same waters.

Proposal 192 as written would eliminate all SOC plan fishing opportunity for **361 of 408 permit holders — 88.5% of this fleet** — based on a conservation impact the data show is smaller than the prohibited-species bycatch mortality of an unrestricted fishery operating beside them. The Sustainable Salmon Policy does not permit this. The burden of conservation must be shared proportionately. It is not being shared proportionately.

I urge the Board to reject Proposal 192 as written and return to the alternative-gear framework of ACR 8 and Proposal 313. Give the 47 beach lease holders their seine option. Give the 361 offshore lease holders their set gillnet. Build the data record the Board says it needs. And let the recovery trajectory that began in 2025 — achieved with setnets fishing — continue toward the three consecutive years that will bring this fishery out of the Stock of Concern plan.

Respectfully,

Dan Norman

April 2026

Name: Carrie Hollier

Community of Residence: Kenai Alaska

My name is Carrie Hollier. I have been fishing on the East side of Cook Inlet my entire life. Myself, dad, and my children are all dual SO4H permit holders in Cook Inlet. My kids are fourth generation fisher kids. I have seen the rise and now the fall of the East Side Set Net Fleet. I am hopeful with the strong sockeye runs predicted and the uprising numbers of King Salmon returning, my family will be able to be able to return to the days of working hard to achieve an honest and rewarding livelihood.

I oppose Proposal 192 as written. I strongly disagree with the idea of replacing Set Net gear entirely. If this proposal passes, 88.5% of setnetters would lose their opportunity to harvest sockeye even when when the chinook goal is met.

Last year during the (2) day Set Net season, only 6 large Kings were caught. According to genetics, only 4 of those 6 were Kenai River Bound. When fishing the 8 hour openers, we do not have gear in the water during low tide. A method that has shown to catch far fewer chinook.

I do support Set Beach Seines as an ALTERNATIVE gear type, NOT as a replacement to Set Netting. I participated in the 2024 Commissioners permit Beach Seine Fishery. This implementation of gear proved to be worthy of successfully live releasing chinook while harvesting sockeye.

In conclusion, I strongly oppose Proposal 192, but see the opportunity in changing the language of the proposal for it's purpose to act as an alternative gear type during times of low abundance.

Thank you for your time,

Carrie Hollier

To the members of the Board of Fisheries and other stakeholders,

I am a third-generation ESSN. My children and extended family fish with me as a 4th-gen ESSN fisherman. This small Setnet business has been operating out of Kenai, Alaska, since 1964. That is more than 60 years! While I'm one small family fishing operation in UCI, my operation is similar to dozens of families in the Upper Cook Inlet (UCI).

Although I personally don't collect a PEF because I don't stay in Alaska for the required 180 days, I spend a lot of time and money in Alaska (usually 3-4 months a year), and I have always hired several local Alaskans to join my crew. To the genuine locals, I am considered a part of the local community.

Last year alone, I spent over \$100,000 on my business **in Alaska**; many summers, I spend far more than I make. Please do the math on a small, 62-year-old family business in Kenai, run by a non-resident. This is money that goes back into the local community! This figure does not include the amount of fish that I sell to a local processor, which is even more money that goes back into the Kenia Peninsula community. Again, do the math over 62 years. It easily exceeds \$10M.

I am tired of the false dialogue that "out-of-staters" come to Alaska, make money, and leave. It's not accurate data. Furthermore, this double standard seems to apply only to the non-resident ESSN, because if an out-of-state Sporty comes to AK to spend money and then leaves, the guides love that and don't make a fuss.

Furthermore, I own property in Kenai, and I pay a significant property tax to the local borough every year. I help fund schools that my kids do not attend, as well as other Alaska government institutions.

These "small family farms" also provide sustainable food to people, which I believe should take priority over tourism. You can't eat money or fun, but you can eat fish.

The Set Beach Seine (SBS) was a solution developed by the ESSN to harvest sockeye **below the 14,250 large king escapement goal**, while successfully protecting Kings (Chinook). We have also proven that it works. We have also proven that this can be replicated on multiple beach sites and work. The SBS is a solution to keep small businesses like mine (and scores of others) afloat **if we are allowed to use them below the 14250 Large King goal mark.**

Having an SBS to use instead of our set nets above the 14250 king goal is a bad deal for the ESSN. It's highly likely we can't use our setnets or the SBS, leaving us with nothing. Proposal 192 gives the illusion of "may fish" but in reality, it is just that, and an illusion; it will be highly probable that our nets stay dry.

I support using an SBS in place of the traditional setnets, provided it can be used below the 14,250 king goal. Again, please remember that the sport fishery and the PU fishery killed more kings than the SBS did when tests and more than the entire ESSN commercial Dipnet fishery did over the last three years.

As proposal 192 currently reads, it has problems; therefore, I oppose it and encourage the Board members to do the same, as it hurts many Kenai Peninsula families and does irreparable damage to the community.

Here are some of the problems with prop 192 (I could list probably 10 problems, but will keep it to four):

1. This is a massive decision to end the use of setnets (a traditional gear type); it definitely should NOT be done out of cycle, with no representation for the ESSN, no deliberation, no committee, no public testimony, etc. That is just bad ethics; not all laws are ethical, and this is one of them.

2. As it currently reads, the “trigger” as to whether we use the SBS is a preseason forecast, which is unprecedented and makes no biological sense. That means that if, during the season, the king number were to exceed 14,250, we still could not fish using the SBS because of where the preseason number sits right now. In reality, the preseason forecast is re-evaluated and become inthe inseason number with more accuracy, so why make a preseason number the trigger - that is just nonsensical.

3. Only allowing the use of the SBS above the 14,250 defeats the entire purpose of the SBS. The SBS was designed and tested specifically to allow ESSNs to fish *below* that threshold with zero king mortality. By locking the use of the new gear behind a forecast number that the river hasn't seen in years, the proposal offers an illusion of opportunity while guaranteeing your nets stay dry

4. Once a fishery loses ground, it never gets it back. To put this decision in a comparable sports fishing context, if you were to be voting on a sport fishing issue of similar magnitude as this “board-generated proposal,” you would be voting to NOT allow mouth snagging (flossing) of any fish below the 14250 king number - people would be up in arms. That is the kind of impact this has for the ESSN. Something of this magnitude needs to be heard in a cycle under appropriate participation and procedures. Proposal 192 eliminates set gillnets as an authorized gear type between June 20 and August 15 when the SOC is triggered. If the SBS proves economically unviable, or if the BOF keeps it locked behind unattainable forecast thresholds, you have absolutely no legal fallback gear. The gillnet option is permanently off the table during these critical mid-summer weeks.

Please oppose prop 192.

Sincerely,

Alan Crookston	Nick Crookston	Chris Rice
Nina Crookston	Lisa Crookston	Nick Haney
Wesley Crookston	Brian Crookston	Josh Hancey
Luke Crookston	Lee Crookston	Mitchele Steed
Todd Crookston	Katie Crookston	Josh Steed
Paul Crookston	Neal Crookston	Jordan Steed
Alison Crookston	Stephen Crookston	Connie Forsgren
Lauren Crookston	Michael Crookston	John Forsgren
Sarah Crookston	Tarah Crookston	Kellie Shirk
James Crookston	Carter Crookston	Dawsey Forsgren
Mathew Crookston	Molly Rivera	Carie Forsgren
	Jackson Rivera	Amy Forsgren
	Makenna Crookston	(UCI fishing crew) ²⁵

CHILKAT INDIAN VILLAGE



**An Indian Reorganization Act Village
Under Act of Congress June 15th 1935**
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April 24, 2026

Via E-Mail and Online Portal

Märit Carlson-Van Dort

Chair, Alaska Board of Fisheries

marit.carlson-vandort@alaska.gov

RE: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

This letter is being submitted by the Chilkat Indian Village (Tlákwan Aan – Klukwan) Tribal Council on behalf of its Tribal Citizens and the residents of the Village of Klukwan. Chilkat Indian Village (Tlákwan Aan – Klukwan) (CIV hereafter), a federally recognized Tribal Government, writes in support of Board of Fisheries Proposal 189 that would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Greater consideration of Indigenous Traditional Ecological Knowledge (ITEK) will improve state and federal decision-making, and is something the Alaska Native community has sought for years. CIV actively works with multiple state and federal agencies to incorporate ITEK in natural resource governance. Furthermore, in 2023, Alaska Federation of Native's membership passed Resolution 23-02, asking the Board of Fish and Board of Game to incorporate ITEK in their processes.

Integrating Indigenous Traditional Ecological Knowledge (ITEK) into the Board's decision-making processes offers a multitude of benefits that enhance the effectiveness and sustainability of fisheries management. ITEK, accumulated over generations, provides a deep understanding of local ecosystems, fish behavior, and environmental changes. This knowledge complements western scientific data, leading to more holistic and informed decisions. Including ITEK in the Board's deliberation can help mitigate divisive proposals by fostering a more inclusive approach that respects and utilizes the knowledge of Indigenous communities. This integration not only bridges cultural gaps but also ensures that management strategies are rooted in a thorough understanding of the ecological and cultural contexts of Alaska's fisheries.

Accordingly, CIV Tribal Council supported the Board's development of its Policy on Traditional Knowledge in 2024, and now supports Proposal 189. Establishing that the Board will consider Traditional Knowledge and Local Knowledge in its decision-making process is good governance and will lead to better informed discussions and better decisions for Alaska.

Gunalchéesh,

Kimberley Strong, President



April 28, 2026

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email: dfg.bof.comments@alaska.gov

RE: Public Comments by KRSA for Statewide Finfish and Supplemental Issues Meeting

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

The Kenai River Sportfishing Association (KRSA) respectfully submits the following public comments for consideration at the Alaska Board of Fisheries Supplemental Issues meeting, scheduled to be held virtually in May 2026. These comments reflect KRSA's perspectives on a series of proposals that directly influence fisheries management, subsistence access, and conservation measures throughout Alaska.

Proposal 189: Incorporating Traditional Knowledge - Support

Adopting a policy to integrate Traditional Knowledge into regulation will significantly enhance fisheries management and foster sustainable practices.

Proposal 190: Yukon River King Salmon Stock of Concern Management Plan - Support

Adopting the Stock of Concern Action Plan for Yukon River king salmon into regulation will formally codify board intent for management during an unprecedented period of decline. The Management Plan should include recovery criteria necessary for removing the Stock of Concern designation.

Proposal 191: Yukon River Fall Chum Salmon Stock of Concern Action Plan - Support

KRSA supports adopting the Stock of Concern Action Plan for Yukon River Fall Chum salmon into regulation including recovery criteria for removing the Stock of Concern designation.

Proposal 192: Replace Commercial Set Gillnets with Beach Seines in the Kenai River Late-run King Salmon Stock of Concern Management Plan - Support

KRSA supports replacing commercial set gill nets with set beach seine gear in an attempt to reduce incidental king salmon mortality while fishing for target sockeye. Continuing restrictions on the commercial set gillnet fishery are essential to equitably share the conservation burden, protect escapement, and rebuild a sustainable Kenai king salmon run.

Beach seines have the potential to significantly reduce king mortality by releasing kings that survive initial capture. King catches are also expected to be reduced by limiting beach seines to shoreline fishing sites which will reduce the fishery area and amount of gear in the water.

Experimental use of beach seines in 2024 under commissioner permits found that this gear can provide significant commercial fishing opportunity for abundant sockeye. This gear option was not available when the current *Kenai River Late-run King Salmon Stock of Concern Management Plan* was adopted in early 2024.

Careful implementation is warranted considering significant questions regarding catch efficiencies and incidental mortality rates for king salmon. Depth has been a critical factor in the design of the set gill net fishery, yet there has been limited evaluation of how beach seine length and depth affect king salmon encounters in different areas of the fishery. Mortality rates on kings released alive from beach seines are unknown. Fish might be subject to significant delayed mortality found in commercial salmon fisheries in other areas.¹ King salmon moving close to the beach may also be caught and released multiple times which will likely reduce survival. Delayed impacts of capture might also include reduced spawning success even among fish that survive.

All commercial fishery opportunities should continue to be managed conservatively based on king salmon abundance. If Proposal 192 is implemented, KRSA recommends that fishing activities should not commence until the minimum recovery goal of 14,250 king salmon is assured while considering potential errors in preseason forecasts and inseason projections of run size, and uncertainty in estimates of catch and release mortality in beach seines.

KRSA encourages the Department to seek answers to the key questions regarding king salmon catch and survival rates in beach seines. The association does not support the issuance of Commissioner's permits to investigate these issues if there is uncertainty about achieving the recovery goal.

Respectfully submitted,



Shannon Martin
Executive Director
Kenai River Sportfishing Association

¹ <https://wdfw.wa.gov/sites/default/files/publications/01595/wdfw01595.pdf>

Name: Francis Estalilla

Community of Residence: Aberdeen WA

PROP 190: SUPPORT with amendment

This clause...

(1) the majority of the lower bounds of the established BEG and SEG ranges are met or exceeded in five consecutive years and is expected to be met in the future years;

... is a terribly WEAK threshold for lifting the stock of concern status.

While three out of five is technically a MAJORITY, when I went to high school 60% was a grade D-minus.

You MUST do better!

At the very minimum, please add the language, "at least one of which must meet or exceed S-msy" just like the de-listing criteria you wisely included in the Kenai Late Run King Salmon Action Plan.

Even better would be to make it 5 out of 5 years (as in the Yukon chum proposal 191) exceeding the lower SEG/BEG with at least one year meeting or exceeding S-msy.

Thanks for your consideration.

PROP 191: SUPPORT with amendment

This clause...

(1) the lower bound of the drainage-wide sustainable escapement goal (SEG) of 300,000-600,000 fall chum salmon has been achieved or exceeded in each of the five consecutive years; and is projected to be met in future years;

... MUST likewise be strengthened as per my proposed amendment for Prop 190.

Simply add the language, "at least one of which must meet or exceed S-msy"

Again, thanks for your consideration.

PROP 192: SUPPORT with caution

I applaud the Board's forward thinking on implementing LIVE CAPTURE techniques in the sockeye-directed fishery of the east side Cook Inlet beaches. Live sorting and release of NON-target late run king salmon from abysmally depleted populations bound for the Kenai and Kasilof Rivers is a MAJOR step forward in the management of the east-side beach fishery to better achieve king salmon recovery.

Be particularly mindful that the real-time dataset on this emerging gear-type is extremely limited and should cautiously be considered PRELIMINARY. While the survival of kings salmon encountered by the gear would intuitively be improved, any gains in improved release mortality could be offset by 1) the potential for a greater number of first time chinook encounters with the gear, and 2) the certainty of subsequent recapture at some unknown level.

This proposal no longer has many of the essential "king avoidance" elements of the modified ESSN fishery found in the original Kenai LR King Salmon Action Plan... e.g. short nets, shallow nets to keep them off the bottom, NOT fishing thru the period within two hours on either side of low slack tide... provisions meant to keep the gear from encountering kings in the first place.

I am hopeful that the improved release mortality rate of this emerging gear-type proves to be significant enough to offset any possible unintended additional mortality arising from greater king salmon encounters. If the contrary proves to be the case, the 12 hour periods could be modified at the next UCI Finfish Meeting in 2027 to avoid fishing thru the low tide exchange.

Given these uncertainties, this beach seine fishery should NOT be prosecuted unless the recovery goal of 14250 is ASSURED. In other words, the Board should consider 14250 as the "hard bottom" below which NO ONE is fishing.



April 28, 2026

Alaska Board of Fisheries
 Marit Carlson-Van Dort, Chair
 Via email: dfg.bof.comments@alaska.gov

RE: Oppose Proposal 192

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to provide written comment in advance of the special virtual May Alaska Board of Fisheries (BOF) meeting. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association comprised of major Alaska seafood processing companies that operate in 22 coastal communities across Alaska. PSPA member companies have historically participated in and are fully dependent on commercial salmon fisheries across the state, including on the Kenai Peninsula. **PSPA opposes Proposal 192 and any modification of this proposal, which eliminates an entire gear type from fishing Upper Cook Inlet (set gillnet gear) in the Kenai River Late-run King Salmon Stock of Concern Management Plan. We would clearly also oppose broadening this proposal to further restrict or eliminate the gear type in Cook Inlet regulations.**

The significance of eliminating an entire commercial fishery and the highly allocative nature of the proposal are reasons enough not to approve Proposal 192. At a minimum, the Board should review it during the regular in cycle period, at the time other relevant proposals are being deliberated and stakeholders would have adequate ability to provide input into the process. The Board will be reviewing all Cook Inlet escapement goals and stock of concern recommendations in October, prior to the 2027 cycle when this issue should be discussed. The Board instead chose to deliberate the proposal out of cycle, in a virtual meeting not scheduled until last month, and with no allowance for oral public comment at the meeting. In a normal Board meeting, the public has opportunity to not only submit written comments, but also has at least two opportunities to comment orally, and opportunity to discuss issues with Board members in person at various times. These additional public input opportunities are extremely important to fill information gaps, answer questions, respond to proposed modifications of proposals, or correct the record, since the Board can amend and adopt proposals in the same meeting. The May 1 meeting allows for none of these opportunities and is extremely poor process compared to the Board's standard.

Proposal 192 was adopted on the record in March as a Board Generated Proposal in part *to address the inability of fishermen to sell their catch under a commissioner's permit testing beach seines*. Fishermen were able to sell these fish prior to the Board's actions in 2025. But when the Board modified Proposal 313 last year to replace setnet gear with beach seines (instead of adding beach seines) and the proposal failed, the result was that beach seines were prohibited from selling fish, even under a commissioner's

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permit. ADFG has made clear on the record that while Proposal 192 would allow the sale of fish harvested with beach seines, it would also prohibit set gillnet gear.

In addition, the memo from CFEC to the Board dated April 6 and posted to the Board's website stated that Proposal 192 likely violates the Alaska Limited Entry Act. CFEC questions the legality of the removal of set nets for beach seines in the SO4H permit. They point out the action would effectively create a new fishery, beyond a gear modification or addition, in which case "CFEC does not have statutory authority to impose or enforce limitations on a fishery that has not undergone limitation proceedings." The memo also points out the proposal ties the gear authorization (beach seine) to the lease site as opposed to the permit, which is also a violation of the Limited Entry Act. In addition, the memo emphasizes the high cost of seine gear and the burden of requiring significant capital investment from a fleet already facing economic constraints and with little time before the season starts, as well as the practical reality that many permit holders do not have suitable shoreline access for beach seines. There is no question this proposal will remove access to the fishery resource from commercial fishermen.

Additional reasons PSPA opposes Proposal 192:

- **According to CFEC data, the Cook Inlet set gillnet fishery has 730 active permits and 84% of them are held by Alaska residents.** Proposal 192 would not only eliminate these small Alaska businesses from fishing in Upper Cook Inlet but severely reduce the permits' value. Any discussion of a buyback, in this process or the Alaska Legislature, is disingenuous when you've removed value associated with a permit.
- The Board's recent action at the Statewide meeting to close three major areas to drift gillnet fishing in Cook Inlet is already severely damaging to the 560 permit holders in that fishery and the small processors on the Kenai that buy their fish. Taking further action to eliminate the set gillnet fishery from Upper Cook Inlet is not fisheries management, it is just punitive to the commercial sector that supports the Kenai Peninsula.
- **Exploitation of this stock is below 5% in all fisheries combined since 2020, and the Upper Cook Inlet commercial harvest of all Chinook salmon in 2024 was 169 fish (97% below the previous 10-year average of 4,969 fish).** Prohibiting an entire setnet fishery, eliminating businesses, and sacrificing the economic benefit to Kenai Peninsula communities is unnecessary and punitive given this low level of impact. By comparison, ADFG data show 3,526 Chinook were killed in the freshwater component of the Cook Inlet sportfish fishery in 2024, using an 8% catch-and-release mortality rate, which equates to 95% of the mortality.
- The Kenai River Late-run King Salmon Stock of Concern Plan is meant to help recover the stock, but the Board is continually changing the goals. The SEG for the stock is 13,500 - 27,000 fish and has been met in 5 of the last 9 years. ADF&G continues to recommend the SEG remain the same each Upper Cook Inlet cycle. However, in 2020 the BOF created an OEG of 15,000 - 30,000 fish.

Then in 2024, in the creation of the Kenai River Late-Run King Salmon Stock of Concern Management Plan, the Board created a Recovery Goal of 14,250 - 30,000 fish. The Board continues to raise the goals above what ADF&G finds is necessary to sustain fish populations and prevent overfishing while allowing for continued commercial harvest.

- While the proposal applies to the Kenai River Late-Run King Salmon Stock of Concern Management Plan, on the record, one purpose of the proposal seems to be to conserve coho salmon returning to the Deshka and Little Susitna Rivers in Northern Cook Inlet so they can be harvested instead in the sportfish fishery, **which is not a conservation issue, but an allocative one**. In addition, the proposal is not tied in any way to coho abundance. The proposal instead creates a prohibition on set gillnet gear without the ability to adjust gear restrictions in response to actual coho harvests or escapement. In addition, as described in ADFG comments at the Statewide meeting, coho is well understood to be underestimated by the Deshka River and Little Susitna River weir counts.

Please oppose Proposal 192. Aside from the lack of conservation merit, lack of previous support from ADFG, and inconsistencies with state law, it eliminates a commercial fishery supporting the Kenai Peninsula without adequate notice to those affected and no public comment opportunity during the Board meeting.

Sincerely,



Julie Decker
PSPA
Wrangell, AK

Name: Chelsa Johnson

Community of Residence: Homer

Dear Chair and Members of the Alaska Board of Fisheries,

I am writing to formally oppose Proposal 192.

Proposal 192 should be rejected because it does not simply add beach seining as an optional tool for East Side Setnet permit holders. It replaces commercial set gillnet opportunity in the Kenai River Late-Run King Salmon Stock of Concern Management Plan with a newly established set beach seine gear type. That is a major allocative, economic, and structural change to the East Side Set Gillnet fishery.

Many setnetters do not support Proposal 192 because it would take away lawful, traditional set gillnet opportunity and replace it with a gear type that is not proven to be workable across the full fishery. Beach seining may work in limited locations under limited conditions, but it is not a fair, practical, or fleet-wide replacement for the ESSN fishery.

ADF&G's own analysis identifies serious problems. Adoption would likely reduce commercial harvest by an unknown amount. It would also reduce the number of permits able to participate because not all permit holders have onshore DNR lease sites. This means Proposal 192 does not encompass the totality of the setnet fleet. It would create winners and losers within the same permit class.

That raises a serious fairness question: who gets to participate, who does not, and why?

If this proposal results in only a small number of permits being able to fish — whether that number is 38 permits or any other limited number — the Board must explain how those permits are selected, what legal basis supports that selection, and what happens to all of the remaining permit holders who still cannot fish. A proposal that leaves the majority of setnetters shut out while allowing only a select group to operate is not a conservation plan. It is an allocation decision.

There are hundreds of Cook Inlet set gillnet permits, and ADF&G has reported more than 700 active set gillnet permits in Cook Inlet. ADF&G also states that more than 1,300 drift and set gillnet limited entry permits exist in the UCI area combined. If only a small subset of permit holders can physically or legally use beach seine gear because of lease location, beach profile, equipment, tide conditions, or site access, then Proposal 192 is not a replacement for the ESSN fishery. It is a selective reallocation of opportunity away from many families and businesses.

The Board should also consider fish quality. Beach seining requires fish to be pulled onto the beach, and in some operations fish may have to be dragged or moved with tractors, loaders, or even heavy equipment such as a D6, depending on beach conditions. That raises serious concerns about bruising, crushing, sand, mud, seaweed contamination, delayed handling, and overall market quality. Commercial fish quality matters. If fish are dragged up the beach through seaweed, sand, mud, and debris, the product is not the same as fish handled through a conventional setnet operation.

This is not a minor operational detail. Poor quality harms markets, processors, fishermen, and the reputation of Cook Inlet salmon. Before the Board replaces an entire commercial gear type, it should require a complete fish quality analysis, processor input, handling protocol, and economic review.

Beach seine gear is also highly site-specific. ADF&G has acknowledged that it is sensitive to weather, tide stage, water conditions, beach profile, obstructions, steep beaches, shallow beaches, and extended tidal flats. Setnetters know these beaches are not uniform. Some sites may be too steep. Some may be too shallow. Some may have heavy seaweed. Some may not have enough beach. Some may not be safely workable with the tides. Some permit holders do not have the lease location or physical beach conditions necessary to operate this gear.

That means Proposal 192 would not treat permit holders equally. It would allow opportunity for some while leaving others with no meaningful way to fish.

The economic impacts are also significant. Setnetters have invested in permits, leases, sites, nets, anchors, boats, equipment, crews, cabins, shore infrastructure, and decades of work based on the legal set gillnet fishery. Proposal 192 would force permit holders to purchase new gear and possibly heavy equipment, while still denying many of them any practical ability to participate. There has been no adequate economic analysis, no transition plan, no compensation plan, no processor quality review, and no fleet-wide feasibility review.

There are also unresolved biological and management questions. ADF&G has acknowledged that beach seines may be effective in some circumstances, but there are still unknowns regarding how effective the gear would be across the subdistrict and the fate of released fish. Limited experiments in limited locations should not be used to justify replacing a long-standing fishery.

Proposal 192 is also incomplete from a regulatory standpoint. ADF&G has identified inconsistent stipulations between allowable gear and allowable fishing locations, and noted that the proposal does not explain how the department should adapt management to inseason run information. A proposal with unresolved location, gear, enforcement, quality, allocation, and management questions should not be adopted.

The current Kenai River Late-Run King Salmon Stock of Concern Management Plan already restricts set gillnet opportunity to protect king salmon. Set gillnet fishing is only allowed when the recovery goal is projected to be met. If that threshold is met, then the rationale for removing setnets disappears. If the threshold is not met, then Proposal 192 still does not provide equitable access to all setnetters.

I also object to the process. A proposal that effectively removes set gillnet opportunity from the management plan and replaces it with a gear type that only some permit holders can use should be heard during the regular Upper Cook Inlet cycle with full public testimony, full public notice, full economic review, and meaningful participation by all affected permit holders.

If the Board wants to explore beach seines, it should do so as a voluntary, additional, experimental option with clear safeguards — not as a replacement for set gillnets and not as a selective allocation of opportunity to a small number of operators.

Before any beach seine proposal is considered, the Board should require answers to the following:

Who is eligible to fish this gear?

How many permits can actually participate?

What happens to the permit holders who cannot participate?

How will permit holders be selected if only a limited number of sites are workable?

What is the legal basis for allowing some S04H permit holders to fish while others remain closed?

What are the fish quality impacts of dragging or moving fish across the beach?

What are the processor and market impacts?

What are the costs of new gear, tractors, equipment, crews, and beach modifications?

How will enforcement work?

How will ADF&G manage this gear inseason?

What data proves this gear can work across the entire ESSN fishery, not just a few selected sites?

Until those questions are fully answered, Proposal 192 should not be adopted.

For these reasons, I respectfully request that the Board reject Proposal 192 in its entirety. The Board should preserve lawful set gillnet opportunity in the East Side Set Gillnet fishery and direct any future consideration of

beach seine gear through a transparent, fully noticed, science-based, economically informed, and fleet-wide process during the regular Upper Cook Inlet meeting cycle.

Respectfully,

Chelsa Johnson

CANFISCO GROUP USA

A Division of the Jim Pattison Group

April 29, 2026

Ms. Märit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Canfisco Group opposition to Proposal 192

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

The Canfisco Group comprises several seafood processing companies united by common ownership and purpose. Our group operates 11 seafood processing plants in Bristol Bay, Kenai, Kodiak, Yakutat, Sitka, and Ketchikan, employing 4,000 workers and supporting 1,750 independent fishermen each year.

Canfisco Group opposes Proposal 192, which would eliminate an entire gear type (set gillnet gear) from the Kenai River Late-run King Salmon Stock of Concern Management Plan. We would further be opposed to any amendment that broadens this proposal to further restrict or eliminate any commercial gear type in Cook Inlet regulations.

We believe the allocative intent of the proposal to remove an entire commercial fishery that has been a historical participant in Upper Cook Inlet is reason enough to reject the proposal. Any proposals that are allocative in nature should only be deliberated in-cycle when escapement goals and stock of concern recommendations are being reviewed, and other relevant proposals are being considered.

Throughout the entire statewide meeting, there was no notice of the intent to create the board generated proposal that created Proposal 192 until immediately before miscellaneous business. There was no ability for stakeholders to engage.

The Board Generated Proposal was adopted in part to address the inability of fishermen to sell their catch under a commissioner's permit testing beach seines prior to the start of this year's salmon season. Last year, when the Board flipped Proposal 313 from adding beach seines to the S04H permit to replacing set gillnet gear with beach seines, and then voted down the proposal, the results were that beach seines were prohibited from selling fish, even under a commissioner's permit. The memo from CFEC outlines that even if the board passes Proposal 192, S04H permit holders will likely not be eligible to sell fish caught by beach seines this year. The proposal may violate the Limited Entry Act, as removing one gear type and replacing it with another would effectively create a new fishery and require limitations proceedings.

Proposal 192 states retention of king and coho is prohibited from a beach seine and deliberation on the board generated proposal cited it would pass more coho to Northern Cook Inlet. ADF&G statewide comments outlined that the only coho index streams that have not met escapement recently (Deshka and Little Susinta) have not



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been fully enumerated for the last five years due to environmental factors¹. *These fish counts below escapement are minimum counts.* Proposal 192 is not a conservation effort; it is entirely allocative as it prohibits S04H permit holders from selling coho (and Chinook), with no ability to retain and sell in the future based on actual coho abundance, at a time when no coho stocks are designated as stocks of concern.

There are 730 active S04H permits to set gillnet in Cook Inlet, and 84% of them are held by Alaska residents. As noted in CFEC's memo, Proposal 192 would eliminate the vast majority of these small Alaskan businesses, as only a few sites are suitable for beach seines. These permit holders were given very short notice that their businesses and the value of their permits are at risk.

Proposal 192 increases restrictions to only commercial fisheries under the Kenai River Late-run King Salmon Stock of Concern Management Plan, aimed at recovering the Chinook stock. The sustainable escapement goal for the stock is 13,500 - 27,000 fish and has been met in 5 of the last 9 years. ADF&G has continued to recommend this SEG for over a decade while the board has repeatedly increased in-river goals. In 2020, the board created an optimal escapement goal of 15,000 - 30,000 fish, and in 2024, a recovery goal of 14,250 - 30,000 fish. The Board has repeatedly raised the goals above those ADF&G deems necessary to sustain fish populations and prevent overfishing while allowing continued harvest. All while making it more difficult for ADF&G to manage and prevent over escapement of the Kenai and Kasilof sockeye.

In 2025, Kenai River late run king salmon escapement was 15,641 large fish - *the recovery goal, optimal escapement goal, and sustainable escapement goal were all achieved.* And the East Side Set Gillnet (ESSN) fishery opened for two very short fishing periods, harvesting only 7 kings among 43,000 sockeye². Eliminating this fishery following a year in which all goals were met is not a conservation effort; it is reallocation. In 2025, Kenai River sockeye escapement exceeded the inriver goal by 140%, and the Kasilof River sockeye escapement exceeded the optimal escapement goal by 223%³.

Exploitation of all Chinook stocks in Cook Inlet is below 5% in all fisheries combined, and the Upper Cook Inlet commercial harvest of Chinook salmon in 2024 was 169 fish⁴. By comparison, ADF&G data shows mortality of 3,526 Chinook in the freshwater sport fishery in the same year, using an 8% catch-and-release mortality rate, which equates to 95% of the overall Chinook mortality.

The Board's recent action at the Statewide meeting to limit fishing time to 16 hours, establish a closure within 2 miles of the Kenai Peninsula, permanently close Drift Area 1, Drift Area 2, and Anchor Point, and increase the

¹ ADF&G (Alaska Department of Fish and Game). 2025. Alaska Department of Fish and Game staff comments on Agenda Change Requests, Alaska Board of Fisheries meeting, Anchorage, Alaska, October 28–29. Alaska Department of Fish and Game, Regional Information Report No. 5J25-03, Anchorage.

² ADF&G (Alaska Department of Fish and Game). 2025. Alaska Department of Fish and Game staff comments on Proposal 192, Alaska Board of Fisheries meeting, May 1

³ Table 192-3 and Table 192-4

⁴ Gleason, C. M., A. R. Munro, and K. P. Gatt, editors. 2025. Run forecasts and harvest projections for 2025 Alaska salmon fisheries and review of the 2024 season. Alaska Department of Fish and Game, Special Publication No. 25-10, Anchorage.



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August 1% rule to 3% is already severely damaging to the 560 drift gillnet permit holders and processors on the Kenai that buy their fish. Taking further action to eliminate the set gillnet fishery is not conservation; it is the continuation of punitive actions against the commercial sector that supports the Kenai Peninsula.

The Board should consider Proposal 192 with respect to the following elements of 5AAC 39.222, the policy for the management of sustainable salmon fisheries:

- The goal of the policy includes the sustained economic health of Alaska's fishing communities,
- The board's regulatory management and allocation decisions will be made in an open process with public involvement, and
- When it is necessary to restrict fisheries on salmon stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use.

Thank you for the opportunity to provide written comments in advance of the special virtual meeting. However, we are deeply concerned by the board's decision to develop this board generated proposal without prior public notice, and to vote on it outside the regular cycle, without in-person public attendance—all within the two months leading up to the start of the salmon season.

Sincerely,



Megan O'Neil
Director of Government Affairs
Petersburg, Alaska



Name: Nate Patsos

Community of Residence: Soldotna, AK

My name is Nate Patsos and I am a third generation East Side Setnet fisherman who lives in Soldotna. I OPPOSE Proposal 192 for several important reasons.

1) This proposal is highly allocative and violates the Board of Fish's own procedures. Such a proposal should not be considered during an out of cycle BOF meeting. It lacks a realistic opportunity for stakeholder input and expert discussion.

2) It is a bad idea to take the setnets out of the setnet fishery. Setnetters have invested a lot of time and money on gear and infrastructure, much of which is custom made by hand for their particular fishery and location. Set gillnets are an efficient and effective tool available to harvest significant quantities of sockeye salmon that are often abundant in Cook Inlet. The majority of S04H permit holders are local residents. Setnets are the tool that brings the value of the natural resource into the local community. Set gillnets should not be eliminated.

3) Proposal 192 would put many S04H permit holders "out of business". I believe beach seines will provide an excellent fishing opportunity for some setnetters, but is not a viable option for all. Many do not have a beach location with a shore lease to use a seine, and of those locations, not all are practical to deploy a seine. Beach seines are not a simple "replacement" for gillnets.

4) Fishing opportunity by set beach seines should not be reliant on exceeding the Kenai king escapement forecast of 14,250. Testing of these seine nets has shown they harvest sockeye without king mortality.

Therefore, beach seine opportunity should be tied to sockeye escapement, not king.

Thank you for your consideration. In conclusion, beach seine opportunity would be a benefit for our community, but regulations need to be implemented following proper procedures and the economic opportunities of stakeholders need to be respected.

Name: Tanya Doner

Community of Residence: Anchorage

I am firmly against board generated proposal 192. You are considering a proposal that will have devastating consequences for the entire fishery without any public testimony and input from stakeholders. Please do not do this.

Tanya Doner

Name: Tony Jackson

Community of Residence: NIKISKI

I am opposed to proposal 192 as it is currently written. The set net fishermen should not be the only user group affected during runs where the stock of concern has not met it's limits. Furthermore, set net businesses should be able to attempt to harvest with seine gear in low abundance years without permanently losing set net gear during high abundance seasons.

Name: Karen McGahan
McJack Fishery

Community of Residence: NIKISKI

I oppose prop 192. Set net fishermen should have equal access to harvesting the resource as drifter fishermen, sport fishermen, dipnetters, and guides. This is not happening now, nor will it happen in the future if this proposal passes.

Name: Leah Jackson

Community of Residence: NIKISKI

I oppose having to give up set net gear while other user groups continue to have access to the resource. In years of low abundance, we are willing to seine, but ONLY in low abundance years.

Name: Alan Crookston

Community of Residence: Kenai

I oppose Prop 192 as it is currently written. The SBS was conceived as an alternative gear type under the SOC plan to harvest sockeye while achieving ZERO king mortality successfully. If an amendment to 192 can be made under these conditions, I can support it, but as it is currently written, I oppose it.

Name: Nina Crookston

Community of Residence: Kenai

I have built and tested SBS on my beach site. It cost me \$988 to put it together. It serves as a means and method of harvesting sockeye while achieving ZERO king mortality. But the only way the SBS makes sense is if it can be used below the 14250 king goal. If an amendment can be made to use the SBS below 14250, then I am in favor. As Prop 192 currently reads, I am opposed.

Name: Wesley Crookston

Community of Residence: Kenai

My dad and I have built and tested SBS on my beach site. It cost me \$988 to put it together. It serves as a means and method of harvesting sockeye while achieving ZERO king mortality. But the only way the SBS makes sense is if it can be used below the 14250 king goal. If an amendment can be made to use the SBS below 14250, then I am in favor. As Prop 192 currently reads, I am opposed.

Name: Luke Crookston

Community of Residence: Kenai

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Name: Wesley Crookston

Community of Residence: Kenai

My dad and I have built and tested SBS on my beach site. It cost me \$988 to put it together. It serves as a means and method of harvesting sockeye while achieving ZERO king mortality. But the only way the SBS makes sense is if it can be used below the 14250 king goal in the SOC plan. If an amendment can be made to use the SBS below 14250, then I am in favor. However, as Prop 192 currently reads, I am opposed.

Name: Victoria Coleman
Behalf of myself East Side Setnetter

Community of Residence: Kenai Alaska

Victoria Coleman
35565 baranof street
Kenai, alaska

I am writing this communication that I am against proposal 192. I am a resident of Kenai, Alaska. My husband, Kenny Coleman was an eastside setnetter for 54 years. I have fished alongside my husband and our 2 sons since 1984. Working with my husband and our children has been the highlight of my working life...watching our sons learning the benefits of fishing and learning a deeply ingrained work ethic is priceless. And yes, many years we've had harvests resulting in great profits as commercial fishers we also have mediocre or bad seasons, all part of the business we've chosen to participate in. However, the last 10-12 years have been difficult to disastrous for setnetters, lack of fishing time due to regulatory changes have placed an inordinate burden of conservation on setnetters.

Each setnetter fisherman is a small business owner. Their livelihoods support their family and fuel the economy in their communities.

This proposal is not fair to all setnetters. I ask each and every one of you on the board of fisheries what am I and other setnetters to do with our setnet permits, nets, skiffs and the shore fisheries leases that I pay and renew every year. Our gear and permits are limited to Cook Inlet. My family has 4 permits, and we all reside in Kenai. This proposal to change the gear requirements is for only a few fisherman/fisherwomen. My husband fought the good fight for many years for all setnetters. He never missed a board of fisheries, as many of you may have seen or talked to him. I am asking each and every one of you to please do not pass proposal 192.

Name: Tim Doner

Community of Residence: Anchorage

I am writing my comments in opposition to BOF proposal 192. This proposal is ridiculous and discriminatory at face value. The fact that a proposal like this and worded in such a way could ever even be considered is frightening and alarming for all user groups involved in the BOF process. The proposal and even the concept of “prohibiting” setnets as a legal gear type in my SO4H fishery should never be considered and I can’t be more opposed to such a narrow minded and every allocative concept.

Thank you for your time.

I do not support any proposal that does NOT have public testimony. This behavior is eroding public trust in the BOF process. This excludes the stakeholder's engagement and does not provide for a reasonable scientific discussion.

I do not support board generated proposals out of regular cycle. When the board at the March statewide meeting during miscellaneous business introduced proposal 192. It did not give opportunity for public engagement. During the statewide meeting in March of 2025 this same proposal was voted down because it did not have enough time for public testimony from the stakeholders.

Proposal 192 is deeply concerning as written; this is not the original proposal submitted as 313 in the March 2025 statewide meeting the BOF took it the original proposal and did exactly opposite of the original proposal. This is straightforward evidence of the BOF intent to erase hundreds of fishermen from fishing.

The BOF has not given ESSN fair and scientific based management since 2014. We have harbored the full share of conservation efforts of a mixed stock fishery. By principal of this board, it is the duty to take every user group and traditional fishing methods into consideration and to share the burden equally! We ESSN fishermen are being singled out for reallocation of a state resource. It is the full intention of the BOF to eliminate ESSN.

This is reallocation in the name of conservation!

Brian Koski

Name: Robert Manley

Community of Residence: Kenai

the board of fish proposal 192. the director of board of fish says that 192 was not presented by the board because of a emergency. if so why try to get 192 past so fast? cant be because of kings when other user groups have caught more in 2025 and the board not trying to slow them down? cant be because of silvers. the board would not replace 210 setnet with 400ft beach seine net to fish were silvers like to go? cant do any thing in a beach seine that you cant do in setnet. you can release a king out of a setnet and it will swim away bent Johnson did this a few years back and tag them and had good outcome on it because he could release them under 3mi. cant do that in beach seine it takes 20 or so mi to release in beach seine. beach seine will have a negative affect on commercial dip net.

as the board knows test on beach seine in Columbia river was not good. 192 affects a lot of people for the board to rush this 192 in is a crime. the board member who made prejudice remarks to commercial fisherman in march 2025 should be excused. i hope the board of fish will do the right thing and vote no on 192. no reason to move so fast on 192. i oppose proposal 192

Name: Boyd Leman

Community of Residence: Ninilchik

Board members..... I'm am writing this in total Opposition to proposal 192. I have never seen anything as lacking in science and reeking in Politics. How does disenfranchising generations of family and community fisheries..... not for a week or month or season but forever solve the problems this proposal creates. As Setnetters we ask that the board work with us to create opportunities and help sustain healthy populations of the various salmon that navigate Upper Cook Inlet not wipe out an established fisherie for the good of a few who happen to be in an area that might work for a beach seine operation. Enacting this proposal will deny opportunities to over 400 setnet permit holders..... please consider working with us not destroying us. I respectfully ask the board to consider alternative options and let us do what we do best..... catch fish for a living and protect the resource. Thanks for your time. Boyd leman

Name: Brian Scow
Scowfishing LLC

Community of Residence: Kenai Alaska

I support 192 with amendments to keep gill nets under the current plan 14,250 kings

Name: Michael Crookston

Community of Residence: Nikiski

I oppose prop 192. It will cause severe damage to the Kenai peninsula community and it's families. I support the use of SBS only if they shell be used below the 14,250 king escape goal within the SOC plan.

Name: Joe Dabranca

Community of Residence: Lincoln California

I support 192 with amendments to keep gill nets under the current plan of 14,250 kings and allow scene nets to be used to release kings

I support Proposal 189 with changes to 5 AAC 96.6XX. (a) as noted below. My reason for excluding the word “enhancement” is because the concept of enhancing salmon runs is not part of Alaska’s constitution. *Protection* is the constitutional mandate and enhancement is not part of protection or traditional or even local knowledge. Enhancement has, in some areas, created tremendous imbalance and is an issue that has overridden traditional and local knowledge, with ruinous results. It does not belong in this Proposal.

I submit my own revision of 5 AAC 96.6XX. (A) and (b) because there is no mandate for inclusion of local or traditional knowledge on the committees that report to the board and it’s critical to bring that knowledge in at the beginning. For committees and teams to fully and completely assess, comment, and recommend policy to the Board, those committees and teams must include local and traditional knowledge. For instance, the Cook Inlet Regional Planning Team consists only of aquaculture representatives and state employees. There are times when local and traditional knowledge (I have watched this time and time again) is blatantly ignored and reasonable questions completely bypassed. This is unacceptable. For the Board to receive accurate, timely, whole-picture information, respectful inclusion of local and traditional knowledge at the very beginning must be mandatory and inclusive. It makes no sense to have local and traditional knowledge become an issue at Board Meetings when it could have been included from the start in advisory committees, regional planning teams, and other groups.

PROPOSAL 189

5 AAC 96.6XX. New Section.

Adopt a Policy on Traditional Knowledge into regulation, and incorporate the new concept into subsistence regulations as follows: This regulatory language is in addition to

2024-305-FB: Alaska Board of Fisheries Policy on Traditional Knowledge Chapter 96 is amended by adding a new section to read:

5 AAC 96.6XX. Board of Fisheries policy on traditional knowledge.

(a) The Alaska Board of Fisheries recognizes local knowledge and traditional knowledge as an important aspect of best available science. As such, access to these knowledge systems should be an important part of informing Board decisions through their close proximity and intimate, often long-standing, relationships with fish resources, the environment, and the ecological systems that are critical to fishery sustainability. These relationships may exceed direct references to the natural world to include values associated with an entire world view, such as reciprocity, respect, and relationality.

The Board endeavors to incorporate traditional knowledge by seeking and inviting traditional knowledge holders recognized and nominated by their community, tribe, or by an organization whose interests encompass the conservation, protection, restoration, [OR ENHANCEMENT] of fishery resources, to share their experiences, values, alternative and/or independent observations and data collections directly with the Board, **it's committees, and teams**.

(b) For the purpose of this section, "Traditional Knowledge" means knowledge, or a way of knowing, that is unique to a given culture or society, and, often through language, encompasses a worldview that defines specific relationships between humans and nonhuman attributes of the world. As knowledge that derives from both personal and the cumulative experiences of one's forbearers, it is grounded in generational knowledge but also subject to change and refinement.

Traditional Knowledge is characterized by a long time scale, is usually local in scale, and often provides a counterpoint to more broad-based, scientifically produced knowledge. This sharing of information may not be limited to in-person testimony but may include consideration of alternative forms of audio or visual media at the discretion of the chair. The Board will provide the opportunity to sign-up prior to Board meetings to

provide traditional knowledge relevant to the proposals and subject matter under consideration at that meeting. The time allowance is ten minutes. The Board defines Traditional Knowledge differently than Local Knowledge.

[THE BOARD’S DECISION-MAKING HAS LONG INCORPORATED LOCAL KNOWLEDGE HOLDERS AND EXPERTS PRIMARILY THROUGH THE DEPARTMENT’S LOCAL ADVISORY COMMITTEES, ORAL AND WRITTEN PUBLIC COMMENTS, AND THE BOARD’S COMMITTEE PROCESSES.]

The Board mandates all committees and teams, such as local advisory committees, regional planning teams, and other ad hoc groups, to include a balanced number of local knowledge holders and traditional knowledge holders as part of their voting structure.

(c) For the purpose of this section, “Local Knowledge” means knowledge, or a way of knowing, developed from the observations and experiences of people living, working, harvesting, and processing fish or game in specific places, and local knowledge holders may or may not be Indigenous Peoples. Local Knowledge can evolve over time, but it is inherently the product of knowledge based on personal or shared experience. Local knowledge holders can be local people residing in communities with area and community specific insights to share. One important distinction of local knowledge from traditional knowledge is that one does not necessarily need years of experience to hold local knowledge about an ecosystem, fishery, or species of fish. The term ‘local knowledge holder’ is used in reference to any, and all, people that hold information relevant to a particular fishery for example, residents, fishermen, while a ‘local knowledge expert’ is more specific and acknowledges that an individual may hold above-average knowledge about a topic that is deep in breadth and scope. A ‘local knowledge expert’ may also be recognized by their peers as such.



NATIVE VILLAGE OF NUNAM IQUA

Nunam Iqua Traditional Council

P.O. Box 27

Nunam Iqua, AK 99666

Phone: (907) 498-4184 Fax: (907) 498-4185

Email: nunamtribe@gmail.com

April 29, 2026

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Members of the Alaska Board of Fisheries,

The Nunam Iqua Tribe respectfully submits this letter to formally express our strong opposition to Proposals 190 and 191, which propose changes to the stock status of Yukon River King Salmon and Yukon River Fall Chum.

As a federally recognized tribe representing the interests of its members, who are solely subsistence users, we contend that these proposals have been introduced without providing adequate time for public and Board review of their full biological, economic, and social ramifications.

Our opposition is grounded in the following critical points:

- **Limited Time for Impact Analysis:** The expedited nature of these proposals precludes a thorough review of their long-term impacts on the subsistence resources vital to our tribal members.
- **Insufficient Public Participation:** The compressed comment period restricts our ability, as a tribal entity, to provide meaningful input, which is essential for informed decision-making by the Board.
- **Risks of Hasty Management Decisions:** Altering stock status, especially when it may lead to significant regulatory restrictions, necessitates comprehensive, long-term data. Proceeding without adequate review risks imposing unnecessary economic hardship on our tribal members and could exacerbate existing conflicts over subsistence resource allocation.
- **Need to Maintain the Status Quo:** Current management plans by ADF&G and U.S. Fish & Wildlife are already conservative. A new stock designation, without robust justification and review, is unlikely to improve management outcomes and may unnecessarily complicate existing, effective practices.

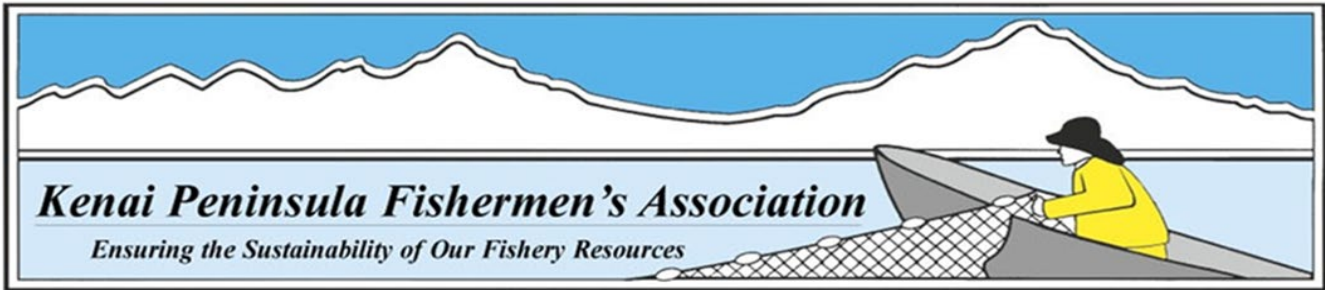
We respectfully request that the Board table Proposals 190 and 191 until the next scheduled cycle. This will allow for a full and transparent review of their potential implications.

Thank you for your time and dedicated service to Alaska's fisheries.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan Peter', with a stylized flourish at the end.

Alan Peter
Tribal President
Nunam Iqua Tribe



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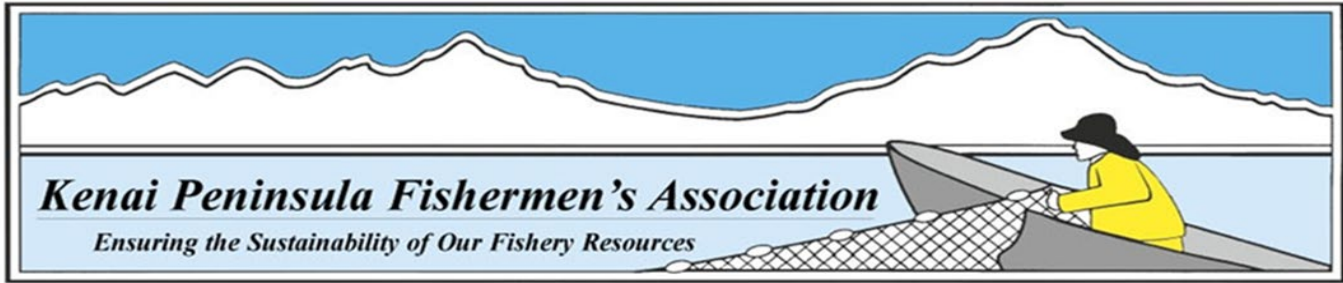
To:	Chair Carlson-Van Dort and Board Members
From:	Kenai Peninsula Fisherman’s Association
Date:	April 29, 2026
Re:	Comment and Substitute Language for Proposal 192 — Set Beach Seines, Upper Cook Inlet Central District Eastside Setnet Fishery

INTRODUCTION OF THE KENAI PENINSULA FISHERMEN’S ASSOCIATION

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

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

The ESSN fishery has been declared a Federal Fisheries Disaster by the Governor of the State of Alaska, Michael J. Dunleavy, for seven of the past eight years. For two years-2018 and 2010, fishermen, processors, crew members and municipalities have received payment. Six years are pending, four approved and waiting for Congressional funding, two waiting approval by the United States Department of Commerce, Secretary Harold Lutnick.



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Alaska Board of Fisheries

P.O. Box 115526
 Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

On behalf of the Kenai Peninsula Fishermen's Association (KPFA), we submit the following comments regarding Proposal 192 and the future structure of the Kenai River Late-Run King Salmon Stock of Management Concern plan for your consideration at the special virtual meeting on May 1, 2026, via Zoom.

We are commenting in opposition to the way Proposal 192 was brought forward—not solely based on its substance, but on the process by which it was introduced. We are concerned that this meeting does not provide for in-person communication with board members, which they so often express makes the process work.

This proposal was generated by the Board without a formal request from an industry stakeholder, departing from the standard public process that ensures transparency, meaningful public engagement, and balanced consideration across user groups. A request for clarification of unknown information from a stakeholder to an ADFG employee should never be considered a reason to open a fully vetted management plan under any circumstance.

The strength of this Board's process has historically been grounded in stakeholder-driven proposals, where those directly affected identify problems, develop solutions, and participate meaningfully in outcomes. Moving forward with Board-generated proposals outside that framework undermines confidence in the process and creates inconsistency in how fisheries are evaluated and managed. For these reasons, we urge the Board to consider both the importance of process and the value of constructive substitute language that leads to practical, equitable solutions and a better outcome for the fishery.

Proposal 192, as written, will result in the loss of our traditional set gillnets; we ask the Board to leave gillnets in the Stock of Concern plan as adopted back in 2024. Conservation measures were considered in depth when the plan was vetted during a full Upper Cook Inlet meeting. Two weeks of public testimony, committee of the whole, stakeholder participation and negotiation cannot be

disregarded with an out-of-cycle board generated proposal for a gear type that is the foundation of a fishery.

Two years into the Stock of Concern plan has resulted in only two days of opportunity in 2025 with gill nets. Those openings represented the work of the stakeholders at the 2024 UCI meeting. With reduced permits, reduced nets, shallower nets, minimal hours in the plan focused around high tides and an in-season projection of over 14,250 king salmon threshold that must be projected with a high degree of confidence. August 5th and 6th in 2025 yielded a harvest of 43,207 sockeye, 82 pink, 42 chum, 7 kings and 1,561 coho. The total large king salmon escapement in 2025 was 15,641 fish.

In 2025, 7 total kings were harvested in the ESSN fishery. Of those, six were over 24 pounds, and one was 2 pounds. The six large kings harvested out of a total run of 15,641 kings represents 0.038% of the 2026 king run—less than four hundredths of one percent. In other words, 99.96% of the run was unaffected by the set gillnet harvest. At that run level, a 0.04% harvest rate is biologically negligible and represents a near-zero impact on the stock.

Given that, set gillnets provided meaningful opportunity for a struggling fishery, they harvested 43,207 sockeyes, and, by design, drastically reduced king salmon harvest during the 16 hours they were fished in 2025.

The Stock of Concern plan already includes significant reductions to fishing time, gear, and area compared to 2010 and 2011, including an estimated:

- 85% reduction in allowable fishing time
- 90% reduction in the number of nets in the water

This is the truth about retaining gillnets in the Stock of Concern plan. Gill nets were not allowed to fish in 2024 because of not meeting the king thresholds, but they were used in 2025 because the king thresholds were met. The Stock of Concern plan in both years performed exactly as it was intended to perform. The 2024 and 2025 seasons reflect the work of the stakeholders at the 2024 UCI meeting. One year the gear was fished, one year it was not.

There is no biological data or harvest data that supports removing gill nets from the Stock of Concern plan. Those fishermen who choose to wait to fish their historic gill nets can do that under the current Stock of Concern plan when it allows.

Rather than limiting opportunity by the elimination of our historic gear, we are offering substitute language to improve this proposal and move the fishery forward—specifically by allowing set beach seines as an alternative to set gill nets only and in a way that enables practical, fleet-scale use by those who choose to use them under the Stock of Concern plan. We recognize the importance of rebuilding the Kenai River late-run king salmon stock within the established recovery goal of 14,250 to 30,000 large fish. Conservation remains the highest priority, and we are committed to being part of solutions that achieve sustainable outcomes as represented by our work at the 2024 Upper Cook Inlet Board of Fish Meeting.

Conservation measures must be applied in a way that is equitable, data-driven, and maintain fishing opportunities where possible, particularly in historical fisheries. We submit these solutions and proposed substitute language for the Board's review. The alternative language should incorporate the following components:

Retention of Set Gillnets

We strongly oppose the complete removal of set gillnets from the Kenai River King Salmon Stock of Concern plan as presented in Proposal 192. Set gillnets must remain in the Stock of Concern plan. The language in Proposal 192 that removes gillnets in the Stock of Concern plan must be removed.

Set gillnets are the historical and proven gear of the Eastside Set Net Fishery (ESSN) fishery. During periods of low king salmon abundance, fishing time will be extremely limited or eliminated under existing management triggers. However, that reality does not justify removing the gear entirely from the plan.

When king salmon abundance allows and goals are being achieved, set gillnets remain the most efficient, fair, and economically viable method for harvesting sockeye salmon. Maintaining this traditional gear preserves flexibility, stability, and the ability to adapt to changing run conditions as they have for 150 years. They should not be replaced in the current Stock of Concern plan and justified for removal because of other available gear types, such as dipnets and set beach seines, which were introduced as alternative gear only, not total replacement solutions.

Adopt Set Beach Seines as an Alternative Gear

KPFA supports the continued and expanded use of set beach seines as an alternative gear type in the Kenai River Late-Run King Salmon Stock of Concern plan. Specifically, we support providing our fishing families with meaningful opportunity to participate in this fishery with set beach seines. This can only be accomplished by adding substitute language to include removing pre-season triggers in the plan that close the fishery, not allow it to open. We suggest:

- Open fishing with set beach seines based on historic season dates and sockeye management tiers currently in the AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan and 5 AAC 21.365. Kasilof River Salmon Management Plan.
- Open set beach seines 24 hours per week by commissioners EO authority.
- Allow for additional openings by the commissioner based on sockeye run strength and king salmon conservation measures.
- Remove pre-season king salmon triggers-Set beach seines, like dipnets are a live release gear and should be tied to sockeye returns.

Set beach seines offer a promising live-release method that testing data shows eliminates immediate king salmon mortality while allowing continued harvest of sockeye salmon. This gear has one full season of evaluation, and with properly scaled use in 2026, significant additional data can be collected.

In the 2024 Experimental Set Beach Seine project, fishermen conducted 364 deployments and retrievals over 21 days with two seines fishing independently and encountered only one large king salmon. The sole large king was just two inches over the large king threshold and was immediately released to vigorously swim away. Other observations during the release of the kings showed no noticeable scale loss attributed to minimal handling and sorting that set beach seines allowed with free swimming fish. The set beach seine is never pursed or lifted with fish inside, drastically reducing the possibility of smashing them. During the experiment, 20,653 sockeye salmon were harvested, indicating that the gear is economically viable when used on the traditional set net running line system. These results represent highly significant data points obtained while using the gear for only one season at two fishing locations near the mouth of the Kenai River. Additionally, set

beach seines appear to have a potential net avoidance factor based on the low interaction with large kings in the 2024 experimental fishery.

The full report can be found at the following link:

https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/ws/rcs/rc005_Lisa_Gabriel_Experimental_Set_Beach_Seine_Fishery_Report.pdf

Implementation at Scale

Through evaluation of setnet lease holders, family sites and local knowledge of the ESSN fishery, we anticipate participation to be limited by families or groups who will work together with a set beach seine. As we have seen in the past two years, not all fishermen will participate with the set beach seines, dip nets or gill nets in the Stock of Concern plan. Participation is up to each individual fisherman.

Set beach seine testing benefits will only be achieved through implementation at scale. A limited experimental fishery cannot generate:

- Statistically valid king mortality estimates
- Adequate king interaction sample size
- Real-world performance across beaches

To get this data we suggest participation at a fleet level that allows the Board and the Department to:

- Evaluate true gear performance.
- Collect meaningful king mortality data.
- Maintain sockeye harvest opportunity within a Stock of Concern.

Equity Across Fisheries

Set beach seines are a demonstrated, working solution—not a theoretical one. They could provide a practical path to restore meaningful harvest opportunity in the ESSN for fishermen who choose to participate with them, while maintaining strong conservation protections for king salmon.

All user groups encounter and release king salmon, yet the level of scrutiny applied to those interactions is not consistent. Estimates of king salmon mortality in the in-river sockeye sport fisheries rely on multiple assumptions, as key variables—such as encounter rates and post-release survival—which cannot be directly measured. The best available estimate places that mortality at approximately 13 large king salmon, with an upper bound of no more than 18 fish as stated in an email from a sport fisheries coordinator, in 2024. The personal use dipnet fishery has an undetermined mortality rate under the Stock of Concern plan.

By comparison, a fleet-scale set beach seine test—using conservative assumptions and using the Department’s standard 7% catch-and-release mortality rate in the in-river king fishery—if applied could result in an estimated 3–4 large Kenai-bound king salmon mortalities in one season. This is well under the assumptions in other fisheries and shows no threat to the survival of the stock.

Despite this, set beach seines are held to a higher standard of proof, while other fisheries continue to operate under similar or greater uncertainty. This creates an uneven framework that does not reflect a consistent, legal, or science-based application of conservation.

Paired Management Considerations

Set gillnets and in-river catch-and-release fisheries must be treated as a paired management consideration. If one is removed or significantly restricted within the Stock of Concern plan, the other must be subject to equivalent restriction or removal. Their existence in the plan went through an extensive public process which considered them paired during that process. If set gill nets are removed from the Stock of Concern plan, by the actions of Proposal 192, then catch and release for king salmon in the Kenai River must be removed.

Set beach seines and non-king target in-river fisheries must be considered an additional pairing. Set beach seines were not in existence when the Stock of Concern was adopted, but through board action in Proposal 192, they are before us now. In this discussion, they are the paired management equivalent of the in-river fisheries. In-river fisheries provide opportunity to harvest abundant sockeye and coho while relying on the live release of incidentally encountered king salmon, and both currently have uncertain post-release mortality rates. Under the Stock of Concern plan, the in-river sport fishery on the Kenai River is currently allowed to harvest 6 sockeye per day with 12 in their possession, regardless of the pre-season or in season sockeye run strength. In recent years, they have been liberalized for coho in mid-August. Both in-river fisheries have unknown interactions with king salmon with an assumed 13-18 large king mortality.

These fisheries all represent opportunity-based fisheries, and must be evaluated equally within the management framework, further supporting equal protections under the Alaska Constitution.

A fair and effective management approach requires that:

- King mortality is evaluated consistently across all fisheries.
- Conservation measures are applied equitably among users.
- Management decisions are based on comparable standards of data and uncertainty.

Set beach seines represent a gear type specifically developed by stakeholders to reduce king salmon impacts as an alternative gear in the Stock of Concern plan. Applying more restrictive standards to this gear than to others with comparable or greater uncertainty is inconsistent with both the Board's mission and equitable fisheries management.

Board policy requires that similarly situated user groups are treated consistently and that conservation measures are applied in proportion to each user group's relative impact on the resource. Alternative gear, including set beach seines, provides a means to achieve conservation objectives while maintaining fishing opportunities. Incorporating alternative gear allows conservation burdens to be applied proportionally and, in a manner, consistent with the constitutional principles of common use and equal protection.

Conclusion

During the two weeks of the 2024 Upper Cook Inlet Board of Fish meeting, permit holders worked collaboratively with ADF&G, Board members and other user groups to develop operational measures now included in the Stock of Concern plan through a fair and transparent process that reflects Alaska's fish and game regulatory system. This was a substantive; technical process grounded in real-world traditional fishing knowledge and science.

With the Board's request to stakeholders for alternative live release gear at that meeting, new gear was designed and tested in 2024 and 2025, producing strong conservation outcomes while

maintaining harvest opportunity for sockeye. The testing results demonstrate that the testing group has provided credible, science-based solutions. If additional testing data is truly the goal as expressed by multiple board members at the 2026 Statewide Finfish meeting, then we request the board adopt set beach seines in the Stock of Concern Plan as an alternative gear and ask the Commissioner to implement set beach seine operations under this section at a scale and geographic distribution sufficient to:

- Produce statistically valid estimates of mortality of king salmon in set beach seines.
- Evaluate gear performance across multiple fishing locations.
- Ensure adequate sample size through active, real-time fishery conditions.
- Allow the sale of sockeye salmon for cost recovery.

Future decisions must be based on demonstrated performance and real-world data—not worst-case scenarios unsupported concerns, or the next wild assumption meant to create barriers for set beach seine implementation as an alternative gear type in the Stock of Concern Plan.

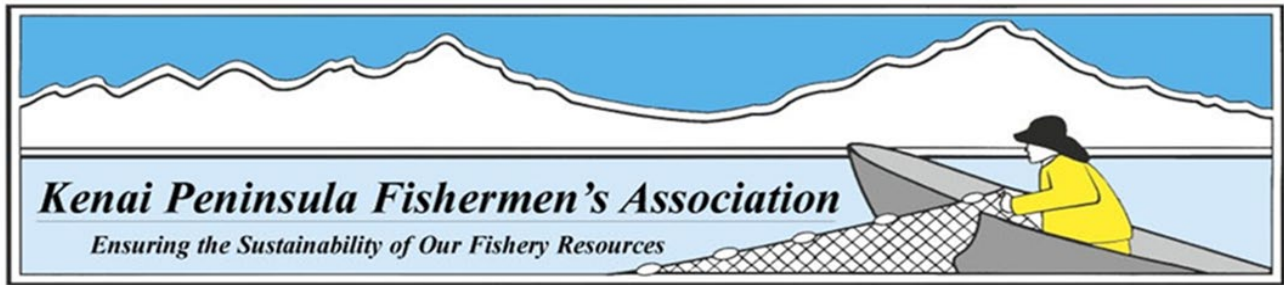
Proposal 192, as written, removes a proven gear without sufficient supporting data and is inconsistent with Article VIII of the Alaska Constitution, which ensures common use and prohibits exclusive advantage in fisheries, while failing to apply conservation measures equitably across user groups. The Board should consider the innovative live-release gear developed by stakeholders at its request as a solution that advances conservation and equitable access simultaneously.

We are not asking the Board to choose between conservation and fishing—we are asking for a plan that responsibly achieves both. The Board asked this fishery to find a way to harvest sockeye while protecting king salmon. Through innovation and adaptation of our traditional gear, the Board cannot deny that we have done exactly that.

In summary, Proposal 192 did not originate from stakeholders and is flawed in both process and substance, undermining the citizen-led process that is fundamental to fair and effective fisheries management. We therefore urge the Board to use the substitute language attached to this letter that includes:

- Retaining set gillnets with the current setnet structure and trigger in the Stock of Concern plan; they remain proven, efficient, and essential when abundance allows.
- Supporting a balanced, science-based approach that protects king salmon while preserving fishing opportunity.
- Supporting set beach seines as a supplemental, live-release gear—with a path to use them and not a replacement for set gillnets.
- Applying conservation standards equitably across all fisheries and user groups.
- Maintaining a multi-gear system that adapts to changing sockeye and king salmon run strength.
- Ensuring management supports both conservation goals and the long-term viability of fishing families.

Our suggested substitute language for Proposal 192 is attached to this letter. We urge the board to consider that language and also consider the sustained hardship this fishery has faced, including seven federal disaster declarations in the past eight years. We respectfully request a path forward that restores meaningful harvest of sockeye salmon, preserves access to historic allocation, and allows our families to continue their generational fishing practices while meeting conservation goals.



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To:	Chair Carlson-Van Dort and Board Members
From:	Kenai Peninsula Fisherman’s Association
Date:	April 29, 2026
Re:	Substitute Language for Proposal 192 — Set Beach Seines, Upper Cook Inlet Central District Eastside Setnet Fishery

PROPOSAL 192

5 AAC 21.382. Kenai River Late-run King Salmon Stock of Concern Plan

Replace commercial set gillnet opportunity in the Kenai River Late-run King Salmon Stock of Concern Plan with a newly established set beach seine gear type, as follows;

(g) In the Upper Subdistrict of the Central District set gillnet commercial fishery,

(1) from June 20 through June 30, when the preseason forecast of king salmon 75 cm mid eye to tail fork and longer is greater than 14,250 fish, including harvest and forecast error, the Upper Subdistrict set gillnet fishery may be opened as follows:

- (A) each setnet permit holder may use up to one set gillnet that is not more than 35 fathoms in length and 29 meshes in depth;
- (B) is open for not more than two eight-hour periods;
- (C) with a 48-hour continuous closure per week, beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;
- (D) fishery openings will be based upon Seldovia District Tide Tables by section as follows:
 - (i) Ninilchik River Mouth to Kasilof River Mouth (Stat Areas 244-21, 244-22), three hours later than the Seldovia District low tide;
 - (ii) Kasilof River Mouth to Kenai River Mouth (Stat Area 244-31), four hours later than the Seldovia District low tide;
 - (iii) opening times will be based on NOAA certified tide tables;

(2) from July 15 through July 27, when the in-season projection of king salmon 75 cm mid

eye to tail fork and longer is greater than 14,250 fish, including harvest and projection error, the Upper Subdistrict set gillnet fishery may be opened as follows:

- (A) each setnet permit holder may use up to one set gillnet that is not more than 35 fathoms in length and 29 meshes in depth;
- (B) is open for not more than four eight-hour periods;
- (C) with a 48-hour continuous closure per week, beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;
- (D) fishery openings will be based upon Seldovia District Tide Tables by section as follows:

- (i) Ninilchik River Mouth to Kasilof River Mouth (Stat Areas 244-21, 244-22), three hours later than the Seldovia District low tide;
- (ii) Kasilof River Mouth to Kenai River Mouth (Stat Areas 244-31, 244-32), four hours later than the Seldovia District low tide;
- (iii) Kenai River Mouth to Boulder Point (Stat Areas 244-41, 244-42), five hours later than the Seldovia District low tide;
- (iv) opening times will be based on NOAA certified tide tables;

(3) From July 28 through August 15, when the in season projection of king salmon 75 cm mid eye to tail fork and longer is greater than 14,250 fish, accounting for anticipated harvest, projection error and in season run strength, the Upper Subdistrict set gillnet fishery may be opened as follows:

- (A) each setnet permit holder may use up to one set gillnet that is not more than 35 fathoms in length and 29 meshes in depth;
- (B) is open for not more than two eight-hour periods;
- (C) with a 48-hour continuous closure per week, beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;
- (D) fishery openings will be based upon Seldovia District Tide Tables by section as follows:

- (i) Ninilchik River Mouth to Kasilof River Mouth (Stat Areas 244-21, 244-22), three hours later than the Seldovia District low tide;
- (ii) Kasilof River Mouth to Kenai River Mouth (Stat Areas 244-31, 244-32), four hours later than the Seldovia District low tide;
- (iii) Kenai River Mouth to Boulder Point (Stat Areas 244-41, 244-42), five hours later than the Seldovia District low tide;
- (iv) opening times will be based on NOAA certified tide tables

2024-2027 Cook Inlet Commercial Salmon and Statewide Regulations-Add the following NEW section under 5 AAC 21.382. Kenai River Late-run King Salmon Stock of Concern Plan.

5 AAC 21.382. Kenai River Late-run King Salmon Stock of Concern Plan.

(6) In the Upper Subdistrict of the Central District set gillnet commercial fishery,

- **from June 20 through August 15, when the preseason forecast of king salmon 75 cm mid eye to tail fork and longer is greater than 14,250 fish, including harvest and forecast error, the Upper Subdistrict fishery may open to S04H CFEC permits as follows:**
 - **allow for the use set beach seine, as defined in 5 AAC 39.105(6), as an alternative gear type for holders of a SO4H CFEC permits;**
 - **one set beach seine may be used per a commercial set gillnet shore fishery lease site, or City of Kenai Lease or historically fished location;**
 - **the maximum legal limit for a set beach seine is 70 fathoms in length, 110 mesh depth including border and chaffing strips, and three and one-half inch mesh size throughout; notwithstanding, 5 AAC 21.332 set beach seines shall have no minimum length, depth or mesh size requirements;**
 - **fishing with a set beach seine must occur from shore or waterline with one end anchored on shore and the outside end must be set and retrieved back to the shore or waterline using a running line;**
 - **fishing with a set beach seine from shore or waterline must occur at the location of a shore fishery tract identified in the recorded plat for that AS 38.05.082 lease, or City of Kenai Lease or historically fished locations; nothing in this subsection affects or changes the terms or conditions of AS 38.05.082 lease or City of Kenai leases and its lessee;**
 - **openings will occur for 24 hours per week, established by emergency order;**
 - **retention of king and coho salmon is prohibited, except that a king or coho salmon that is mortally wounded or caught as defined in (j) in a set beach seine is subject to stipulations in (i) and (j) of this plan;**
 - **the number of any king or coho salmon that are released must be recorded on a ADF&G fish ticket under disposition code for live release;**

■ a commercial dip net may not be operated within 600 ft of any part of a commercial set beach seine and no part of a commercial set beach seine may be operated within 600 ft of any part of another commercial set beach seine.

■ If gill nets are open to fishing on any day in this plan, then no set beach seine may be operated concurrently that same day.

What is the issue you would like the board to address and why? This is a board-generated proposal.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Alaska Board of Fisheries

(HQ-F26-BG

.....

Name: Nathan Scow

Community of Residence: Kasilof

The specific amendments are to keep gill nets in the plan as currently written
And allow for the use of seines under the preseason forecast of 14,250.

Name: Andrew Abraham

Community of Residence: Anchorage

I am neither a fisherman, but have been a subsistence fisherman on the Kuskokwim River for years and became a subsistence fisherman on the Bering Sea coast. I have seen the abundance of fish in both locations. But sadly it has gone downhill, when trawl fishing intensified during the '80s. We weren't able to collect the fish we needed to subsist on, which included dried and smoked salmon, which we shared with people who won't be able to fish. What we caught, we shared with those, who had none. It has to do with communal sharing as well as caring for your family. I'm sure it is the same for every fisherman on the rivers of Alaska.

Name: Lauren Crookston

Community of Residence: Kenai

I can support the use of SBS only if they shall be used below the 14,250 king escape goal within the SOC plan.

Name: GARY HOLLIER
SELF

Community of Residence: KENAI, AK

DEAR MADAME CHAIR AND MEMBERS OF THE ALASKA BOARD OF FISH,
I AM GARY HOLLIER, I HAVE BEEN AN EESN FISHERMAN SINCE 1971. I HAVE ATTENDED EVERY UPPER COOK INLET BOF TRI-ANNUAL MEETING SINCE 1986, PLUS NUMEROUS WORKSHOPS, STATEWIDE, AND ADDITIONAL EMERGENCY MEETINGS.

I AM TOTALLY OPPOSED TO BOARD GENERATED PROPOSAL 192.

I FEEL THAT THIS (BGP) IS CIRCUMVENTING THE BOF PROCESS THAT HAS BEEN IN PLACE SINCE BEFORE 1978, WHEN THE ORIGINAL UPPPER COOK INLET MANAGEMENT PLAN WENT INTO PLACE.

I FEEL THAT AN ISSUE LIKE BGP 192 SHOULD BE BROUGHT UP AT THE REGULAR SCHEDULED UPPER COOK INLET MEETING IN 2027.

IN BGP 192, IF PASSED AS WRITTEN, IT WOULD REMOVE SET GILLNETS FROM KENAI RIVER LATE-RUN KING SALMON STOCK OF CONCERN MANAGEMENT PLAN.

I AM CONFUSED BY WHAT 192 IS ASKING FOR, BUT IF I READ IT RIGHT, ONCE 14,250 LATE RUN KENAI RIVER KING SALMON ARE PROJECTED BY ADF&G ,THEN SET BEACH SEINES WOULD BE AN ALTERNATIVE GEAR TYPE FOR SO4H CFEC PERMITS.

BEACH SEINES WOULD HAVE TO BE SET FROM SHORE AND RETRIEVED BACK TO SHORE WITH A RUNNING LINE.

IF THIS WENT INTO EFFECT MY BEST CASE GUESS WOULD BE A MAXIMUM OF 45 BEACH SEINES MIGHT PARTICIPATE. THERE ARE AN AVERAGE 420 SO4H CFEC PERMIT HOLDERS THAT FISH IN THE ESSN FISHERY.

THAT MEANS THAT 89% OF THE PERMIT HOLDERS WOULD NOT HAVE A FISHERY.

EVERY THING ABOUT BGP 192 IS WRONG.

THE ESSN FISHERY PERMIT HOLDERS ARE 86% ALASKAN RESIDENTS, OF WHICH 80% LIVE IN THE KENAI PENINSULA BOROUGH.

PRETTY CONSEQUENTIAL NUMBERS OF ALASKANS WOULD LOSE THEIR SMALL BUSINESSES, DUE TO THIS ACTION TAKEN BY THE ALASKAN BOF.

ON A PERSAONAL LEVEL, MY FAMILY OWNS 9 SO4H SET NET PERMITS.

I CAN FISH ONE BEACH SEINE UNDER BGP 192.

I RECEIVED AN ORIGINAL SET NET PERMIT IN 1974 FROM CFEC.

THE OTHER 8 PERMITS WERE BOUGHT FROM PRICES ANYWHERE FROM \$15,000 TO \$105,000. THESE PERMITS UNDER BGP 192, WOULD BASICALLY DROP TO ZERO VALUE.

I DO NOT BELIEVE THAT THIS WAS THE INTENT OF CFEC AND THE STATE OF ALASKA WHEN LIMITED ENTRY WENT INTO EFFECT!

ALONG WITH THE DROP IN PERMIT VALUE, THE \$250,000 OF MY GEAR AND EQUIPMENT WOULD ALSO BOTTOM OUT.

BGP 192, IS TOTALLY ALLOCATIVE AND SHOULD NOT BE BROUGHT UP OUT OF CYCLE.

IN 2024 THE KRLRKSSOCMP WENT INTO EFFECT, AT THE UPPER COOK INLET MEETING. MUCH TIME WAS SPEND DEVELOPING THE PLAN.

ROLLING EIGHT HOUR OPENINGS TO KEEP THE SET NET GEAR OFF THE BOTTOM. FISHING WITH 29 MESH DEEP GEAR.

ONE NET PER PERSON,

AN ACHIEVEMENT OF 14,250 LARGE KING SALMON IN RIVER, WERE MANY IDEAS BROUGHT BY STAKE HOLDERS, BOF AND ADF&G TO COME UP WITH THE PLAN.

THE PLAN WENT INTO EFFECT FOR THE 2024 SEASSON.

NO SET GILLNETTING OCCURED IN 2024.

IN 2025, 8742 KINGS WAS THE PRESEASON FORECAST.

15,641 LARGE KINGS WAS THE FINAL ESCAPEMENT TO THE KENAI RIVER.

ONCE 15,000 WAS ACHIEVED FOR ESCAPEMENT, THE ESSN FISHERY WAS GIVEN 2-8 HOUR OPENINGS IN AUGUST.

7 KINGS WERE CAUGHT IN THIS FISHERY.

ONCE THE LARGE KING GOAL IS ACHIEVED THERE WILL BE SOME ASSOCIATED MORTALITY. JUST LIKE THERE IS IN-RIVER MORTALITY WITH THE DIP NET FISHERY AND ASSOCIATED FLOSSING FOR RED SALMON.

THE POINT IS THE RECOVERY GOAL HAS BEEN MET, PER THE PLAN.

FOR 2026 THE PRESEASON PROJECTION IS 12,750 PLUS LARGE KINGS RETURNING TO THE KENAI RIVER.

THE STATE OF ALASKA AND THE BOF HAS IMPLEMENTED RESTRICTIONS ON OTHER AREAS OF THE STATE TO REDUCE KING SALMON HARVEST. IT APPEARS THAT THESE MITIGATIONS ARE WORKING.

FOR THE 2026 SEASON, THE PLAN RECOVERY GOAL OF 14,250-30,000 LARGE KENAI KINGS , WITH A HIGH PROBABILITY WILL BE ACHIEVED, MAYBE 18,000 PLUS.

IN 2027 WITH KING SALMON ESCAPEMENT OF OVER 15,000 OR 18,000, THE OBJECTIVES OF THE KRLRKSSOCMP WILL BE ACHIEVED.

IT APPEARS TO ME THE STOCK OF CONCERN MANAGEMENT PLAN IS WORKING !!

I URGE THE BOF TO NOT PASS 192. IF NEED BE BRING THIS ISSUE UP AT THE REGULAR SCHEDULED MEETING FOR UPPER COOK INLET IN 2027.

THANK YOU,

GARY L HOLLIER

KENAI, AK.

Todd Smith Public Comment on Proposal 192

To: Alaska Board of Fisheries

Re: Opposition to Proposal 192

1. The proposal fails AS 44.62.190's requirement to state a reason.

AS 44.62.190 requires the Board of Fisheries to disclose, with notice of a proposed regulation, the reason for the proposed action and its origin. Proposal 192 supplies neither. The "issue" field reads only "This is a board-generated proposal," and the coordination field is blank. That is an identification of origin, not a reason. A noticed regulatory action that does not state why it is being taken does not satisfy the statute, and that defect cannot be cured by adoption.

2. Whatever the unstated reason is, it is not to help the fishery.

Because no reason is provided, it must be inferred from the text. The text is uniformly restrictive against the existing East Side fleet. Compared to the language Proposal 192 strikes, it eliminates the August window (closes the fishery on July 31 instead of August 15); eliminates the inseason-projection trigger and leaves only the preseason forecast, so a strong inseason run with a weak preseason cannot reopen the fishery; mandates conversion from set gillnet to set beach seine and removes set gillnet authority entirely during king-conservation periods; ties gear deployment to recorded-plat AS 38.05.082 lease tracts, City of Kenai leases, and "historically fished locations" rather than to the permit; prohibits retention of both king and coho salmon; requires individual fish-ticket recording of every released king and coho; imposes 600-foot separations between dip nets and seines and between seines; and limits the fleet to one seine per lease site rather than gear per permit. Increasing harvest opportunity is not on the list.

3. This is the second submission of identical text. Drafting error is not a credible reading.

The operative text of Proposal 192 is word-for-word the substitute language submitted by Members Chamberlain, Carlson-Van Dort, and Godfrey as RC 072 during the March 2025 UCI deliberations on Proposal 313. CFEC's memo charitably treats certain features as drafting issues the Board may not have intended. With twelve months of intervening time and identical text the second time around, that read is not available. It is reasonable to conclude that Proposal 192 has been deliberately drafted, vetted, and pushed forward to align with the Kenai River Sportfishing Association's longstanding policy positions for the East Side setnet fishery, with a clear interest in seeing it adopted before the current administration leaves office.

4. CFEC concern (1): Proposal 192 creates a new fishery that CFEC cannot authorize.

CFEC's April 6, 2026 memo states: "CFEC does not have statutory authority to impose or enforce limitations on a fishery that has not undergone limitation proceedings. In addition, the Alaska Constitution makes clear that fisheries may be limited only for purposes of resource conservation or to prevent economic distress among fishermen." Proposal 192 does not add seine as an alternative; it eliminates set gillnets during king-conservation windows and authorizes only beach seines. CFEC

characterizes that as moving beyond a gear modification and “more closely resemble(s) the creation of a new fishery.” The Board does not have authority to manufacture, by regulation, a new limited fishery that has not undergone the limitation proceedings the Limited Entry Act requires.

5. CFEC concern (2): tying gear to the lease site conflicts with the Limited Entry Act.

CFEC: “The proposal appears to state that each commercial set gillnet shore fishery lease site allows one complement of gear. That approach is inconsistent with the Limited Entry Act, which ties gear authorization to the permit — not the lease site.” Proposal 192’s (g)(1)(B) does precisely that. CFEC notes an individual may hold multiple permits and lease up to three Cook Inlet DNR sites, producing unequal gear authorization that does not track the permit-based structure of limited entry. This is not a drafting nit. It is a structural conflict with AS 16.43 that CFEC, by its own statement, cannot reconcile as the proposal is written.

6. CFEC concern (3): the shore-access asymmetry is a de facto limitation on existing participants.

CFEC’s data: in 2021 there were on average 432 S04H permits registered for this area against only 283 DNR lease tracts, of which only about 99 touch the shore. Proposal 192 requires seine deployment from shore at a recorded-plat lease site, City of Kenai lease, or “historically fished location.” CFEC’s conclusion: “This would amount to a limitation on fishing opportunities among existing participants.” Limitations among existing participants in a limited fishery are governed by AS 16.43 and the Alaska Constitution and require limitation proceedings. The Board cannot accomplish that result by regulation defining gear and operating conditions, and CFEC has explicitly disclaimed authority to enforce such a limitation outside of those proceedings.

Recommendation

Proposal 192 fails the AS 44.62.190 notice requirement, eliminates rather than adds opportunity, repeats verbatim a prior mid-meeting attempt (RC 072), and — by CFEC’s own analysis — requires changes that CFEC does not have statutory authority to authorize and that the Alaska Constitution does not permit. **Reject Proposal 192 as written.** Any further consideration of a shore-based seine alternative for the East Side should originate as an additive option to existing set gillnet authority, tie gear to the permit (not to the lease site), preserve participation across the existing 432-permit fleet, and be re-noticed under AS 44.62.190 with the reason for the proposed action actually stated.

All that was requested by the fishery – and all that is needed – is for the Board to make clear to ADFG that it is still considering beach seines as an alternative gear type in Cook Inlet, and that it’s appropriate to award commissioner’s permits and cost recovery to test this gear so everyone has more data for the next regulatory meeting. That you are considering this additionally restrictive proposal to an already shuttered fishery on May 1 is ironic considering that May 1 is opening day for the targeted Kasilof Early Run King fishery which remains open - with state funded enhancement and a new public facility - despite Kasilof ER Kings meeting every definition of stock of concern.

Todd Smith, Kenai

April 28, 2026

State of Alaska

Dept. Of Fish and Game

Board Support Section

PO Box 115526

Juneau, AK 99811-5526

Chair and Board Members,

I oppose Board generated proposal 192. Members of this Board are circumventing the public process for change of regulation. Several Board Members, with prejudice, have made it very clear that they want to remove set gill nets from Cook Inlet with no consideration of the historical value of this fishery or the impact it will have on the local community and the Kenai/Kasilof River. This is not the purpose of Board Members and is not what is stated in the Constitutional Authority. AS 16.05.221 (a) and (b). The purpose of these boards is for conservation and development of fisheries and wildlife resources.

At the Statewide meeting, March 3 – 16, 2025, Proposal 313, formerly ACR 8 was brought before this Board and voted down. This proposal states that the proposer wanted to include beach seine gear as an additional form of fishing and did not address taking out set gill nets.

I am a commercial set net fisherman on the East Side and have taken the conservation issue very seriously as has my entire family. We have already carried the burden far more than any other user, and we have utilized every method made available to us.

This Board has not taken into consideration any harm that they have done to the set net community, nor the cost that has been placed on us by implementing new gear types.

I believe that this is just another tactic to disenfranchise the user group with no real concern for the conservation of other stocks. There is no scientific proof that set net fisherman are the reason that the King salmon are not returning to the Kenai River. The catch of King salmon by the East Side Set Net (ESSN) has always been less than 1% of the total harvest of salmon.

Respectfully,

Christine Brandt, Keary, Gary Koski, Triple K Fisheries and the Blanchard Family

Constitutional Authority

Unlike many states in the union, Alaska enshrined its regard for natural resources in its constitution. [Article 8 — Natural Resources](#) lays out the framework for management of renewable resources:

§ 2. General Authority — The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the state, including land and waters, for the maximum benefit of the people.

§ 3. Common Use — Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.

§ 4. Sustained Yield — Fish, forests, wildlife, grasslands, and all other replenishable resources belong to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

§ 15. No Exclusive Right of Fishery [as amended in 1972 to allow limited entry] — No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the state

Because fish and wildlife were recognized as critically important to the fledgling state, the Alaska Department of Fish and Game was created as a cabinet level department run by a commissioner, who answers directly to the governor. The directives of the constitution were included in statute by the legislature under Alaska Statute 16.05.020. The functions of the commissioner are to:

(2) manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state.

The legislature also created the eight-member Alaska Board of Fish and Game, which was split into two seven-member boards (one for fisheries and one for wildlife) in 1975. The purpose of these boards is for conservation and development of fisheries and wildlife resources [AS 16.05.221 (a) and (b)].

Name: Keary Koski

Community of Residence: Kenai Peninsula

I oppose proposal 192

Name: Gary Koski

Community of Residence: Kenai Peninsula

I oppose proposal 192

Name: Laura Blanchard
Blanchard Family

Community of Residence: Kenai Peninsula

We oppose proposal 192

Name: Brian Gabriel
Alaska Blue Harvest Seafoods

Community of Residence: Kenai

Brian and Lisa Gabriel

Support for Proposal 192 with Substitute Language
Madam Chair and Members of the Alaska Board of Fisheries,

We are writing regarding Proposal 192 and its consideration at the special meeting of the Board of Fisheries within the Upper Cook Inlet regulatory framework.

We support the adoption of set beach seines as an alternative gear for use in the historical Eastside set gillnet fishery while operating under the Kenai River Stock of Management Concern (SOC) plan. As the original developers and testers of the set beach seine, we recognize set beach seines as viable alternative gear type, when operating under SOC constraints.

In 2024, during the primary testing phase, our group harvested approximately 15,513 sockeye salmon while encountering and releasing 13 king salmon, of which only one was a large king (greater than 34 inches). This demonstrates the gear's potential to provide meaningful sockeye harvest opportunity while maintaining low king salmon mortality through live release.

We presented to the Board at the 2025 Statewide meeting with a proposal that asked to formally implement set beach seines into regulation as an alternative gear within the SOC plan. While that proposal was not adopted, we were encouraged by the Board's recognition of the gear's potential and the expressed need for additional data.

During the 2025 season, we operated under a commissioner's permit; however, we were not allowed to recover costs associated with testing. This created a significant barrier to continued testing and data collection. The East Side Set Net (ESSN) fishery is already under economic strain, and expecting individual fishermen to finance ongoing gear testing is not a sustainable path forward.

At the 2026 Statewide meeting, we were again encouraged by Board member comments supporting the need for continued data collection and acknowledging the loss of a valuable season of information.

We believe set beach seines can provide a viable and conservation-focused harvest method for sockeye salmon while allowing for the live release of king salmon. However, the central issue remains, there is currently no clear regulatory pathway to continue testing and collecting the data the Board has stated it needs. Even under Proposal 192 as written, no structured mechanism exists to advance testing during the 2026 season.

Authorizing set beach seines as an allowable alternative gear within the SOC plan is the most practical way to achieve the Board's stated objectives.

At the same time, we want to be clear that we do not support the removal of set gillnets as proposed in Proposal 192. The development of set beach seines was never intended to replace gillnets, but rather to complement existing gear and expand management options.

It is important to consider recent performance under the SOC plan. In 2024, set gillnets were not utilized due to king salmon estimates falling below the minimum threshold of 14,250 fish. In 2025, because the objectives in the plan were projected, the fishery was conducted with two 8-hour openings on August 5 and 6. During those openings, approximately 43,207 sockeye salmon were harvested, with only 6 large king salmon harvested.

These results reflect that, under the highly restricted framework of the SOC plan, set gillnet operations resulted in a very low level of large king harvest—arguably a biologically insignificant impact.

This raises an important question: did anything occur during those controlled openings that would justify the complete elimination of historical set gill net gear from the SOC plan?

We have not seen evidence that supports such a conclusion.

We believe there is a balanced and practical path forward. Set beach seines should be implemented within the existing plan in a manner that allows the Commissioner to open their use during stock of concern conditions.

This would enable structured, in-season data collection while maintaining conservation safeguards.

Crucially, this can be accomplished without removing set gillnets from the plan. Eliminating a long-standing gear type without sufficient data is not justified and would unnecessarily reduce fishing opportunity.

In summary, we support the following:

- Adoption and implementation of set beach seines as an alternative gear in the SOC plan.
- Maintain set gillnets within the SOC plan.
- Allowing targeted openings of set beach seines under the SOC plan.
- Prioritized structured data collection and evaluation before considering permanent regulatory changes.

We feel this approach aligns with conservation objectives, preserves fishing opportunity in our historic fishery, and ensures that future decisions are grounded in real-world performance and verifiable data.

Thank you for your consideration.

Brian and Lisa Gabriel

Name: Greg Johnson
Johnson Family/Permit Holders

Community of Residence: Vancouver Wa

Board Members

I have participated in the BOF Process for the last 30 years and attended every Upper Cook Inlet BOF meeting and Statewide meeting where Cook Inlet ESSN had an ACR on the Agenda except for one since 2005. I have willingly given months of my life in preparation for and attending past meetings. My family has spent tens of thousands of dollars in direct cost and forgone winter revenue to willingly have me represent our Setnet Fishery and Business. The Introduction and process involved in bringing Proposal 192 to the table is WRONG and a significant departure from the process and Public Trust.

At the 2024 UCI meeting we were asked as an Industry to participate in good faith in the development of the Stock of Concern Plan. We did so and helped to create the plan despite alack of support from our Industry for such a drastic reduction in our fishery. We Acted in Good Faith in that process.

The Current Stock of Concern Plan reduces the number of nets by nearly 90 percent and reduces Time on the water by 85 percent prior to king conservation years. The setnet fishery cannot open unless the Department can assure both the normal minimum escapement goal will be exceeded and the Stock of Concern escapement goal is met or exceeded. Two openers in 2025 produced a King catch of 7 fish. Expanding that catch by fishing a maximum of 6 periods allowed under the plan in 2026 would result in a king harvest of 21 Kings. This amount of King harvest poses No Risk in both achieving or exceeding the minimum escapement goal or creating a risk to the recovery of this stock.

My family represents 5 permit holders and 7 Setnet Permits

- We do not Support Proposal 192

- We do not support Modification of the setnet language or trigger associated with the Stock of Concern Plan

We are not opposed to the investigation of alternative gear or Data collection surrounding it, or development of a proper plan that defines objectives related to Mortality and Demonstrated value across all beaches. There has been no overarching plan, formation of a work group or meaningful outreach by the BOF or the Department to industry in regard to Alt Gear Development. In the early 2000's in Prince William Sound there were significant allocation issues that had persisted for years that the normal BOF cycle had failed to remedy. A work group was formed with Board members and the affected three gear types. The outcome of that process has lasted for over 20 years and allowed all affected party's a opportunity and voice in the process. The institution Of Beach Seines directly into a management plan for Setnet Permit Holders without reasonable time and real participation from industry is inappropriate. The UCI BOF meeting will take place in 9 months.

Greg Johnson and Family

Name: Michael Morton

Community of Residence: HOMER

Subject: Comments Regarding Supplemental Proposals 189-192

To: Alaska Board of Fisheries

From: Michael Morton

I am writing to formally express my support for the repeal of the language originally adopted under Proposal 186/RC161. My opposition to the current regulation is based on significant procedural concerns and a lack of demonstrated conservation necessity.

Specifically, I urge the Board to consider the following points:

Procedural Integrity: The adoption of this measure involved significant process failures, including out-of-session voting and a lack of sufficient opportunity for public testimony. For a management change of this magnitude, a transparent and inclusive process is essential to maintain public trust.

Data Inconsistency: There appear to be significant inconsistencies in the data used to justify this action. Without a transparent, peer-reviewed data set, the regulation lacks the necessary scientific merit required for sound fisheries management.

Resource Allocation vs. Conservation: The current regulation functions more as a single-user group allocation rather than a legitimate conservation effort. Management actions should be balanced and based on clear biological objectives rather than shifting resources without a rigorous public process.

Thank you for the opportunity to comment on these supplemental proposals and for your commitment to fair and transparent fishery management.

Name: Western Brent

Community of Residence: Anchorage

Rescind 186 now for a plethora of reasons and ill protocols!

Name: Charles Lindsay

Community of Residence: Homer, Alaska

My name is Charles Lindsay, and I am a commercial drift gillnet fisherman in Bristol Bay, but I have previously fished Upper Cook Inlet. I recognize that my comment is not about Supplemental Proposals 189-192. But I feel so strongly about this that I am asking the Board to repeal the amendments adopted through Proposal 186 and RC161 and restore the prior Central District Drift Gillnet Fishery Management Plan.

The process that produced RC161 was broken from the start. The substitute language arrived the morning of the vote, after public testimony had already closed on a materially different proposal. Board Member Carpenter said it himself — "the public process is lost to a certain degree." That is not how major regulatory changes are supposed to happen, and this one was major. By the Board's own admissions on the record, RC161 is highly allocative, could cost the commercial fleet roughly a million sockeye, and will make it harder for the Department to manage the Kenai and Kasilof runs. That kind of harm deserves a full public process, not a last-minute substitute with drafting problems the Board was still fixing on the floor when it voted.

The coho conservation record used to justify this rewrite is incomplete and inconsistent — the Department's own staff comments acknowledge that Deshka and Little Susitna counts have been partial or minimum counts for years. Meanwhile Fish Creek and Jim Creek have been meeting or exceeding escapement goals. That is a mixed picture, not a conservation emergency. The Board should repeal RC161, reset to the prior management plan, and bring any new proposal through the regular Upper Cook Inlet cycle with proper notice and a real opportunity for the public to respond.

Name: Josiah Johnson

F/V Valiant

Community of Residence: Soldotna

I would like to submit a public testimony relating to the Petition to remove Proposal 186RC161 regulation change the board has made effecting the Cook Inlet Drift Fishery.

My wife and I are commercial drift gillnet vessel owners and permit holders in this fishery. As a life long fisherman, I have participated in commercial fisheries for salmon, crab, herring, halibut, black cod, pollock. We would respectfully request that the board repeal this proposal. The board is mandated by law to review substantive allocative issues during the appointed board cycle for each fishery. The law as I understand it is there to maintain a fair and balanced assessment of each proposal brought forward. Inclusion of all affected individuals and organizations using the best available science. The board has a duty to provide unbiased decisions based on conservation of the fish stocks as well sustainable harvest of surplus stocks.

Cook Inlet is a unique area with a variety of user groups and has always had many opinions on management of stocks in the region. Please allow for a robust discussion on the best management strategies before large allocative regulations are enacted. We all would like to see Cook Inlet produce vibrant returns of salmon for many years to come, along with providing a means to a sustainable commercial fishery that supports our unique Alaskan lifestyle.

Name: TRAVIS EVERY

Community of Residence: KENAI

Dear Alaska Board of Fisheries,

Since 2012, our family has been actively involved in efforts to provide East Side set netters with opportunities to fish during periods of low king salmon abundance while still allowing for the harvest of abundant sockeye salmon. Over the years, we have watched our fishing time—and our livelihoods—diminish to nearly nothing. Two years ago, following direction from the Board, we worked closely with the Department to implement a successful beach seine operation. This project was 100% observed by a retired Alaska Department of Fish and Game biologist. The results were extremely promising: sockeye harvest numbers were strong, while king salmon interception remained very low. It quickly became clear that beach seining could serve as a valuable additional tool—alongside dip netting and gillnetting—to give the Department more flexibility in harvesting surplus sockeye while protecting vulnerable king salmon stocks.

Importantly, beach seining was never intended to replace gillnetting, but rather to be used in conjunction with it as we cautiously evaluate king salmon returns. In recent years, millions of excess sockeye have escaped to spawning grounds in the Kenai and Kasilof Rivers—fish that could have supported our families and local economy.

Historically, a set net site was defined by a location where the outer buoy would go dry at the lowest tide of the year. These legacy sites shaped the original structure of the Cook Inlet fishery. Over time, however, the fleet has expanded significantly, with operations now extending up to a mile and a half offshore.

We recognize that a beach seine fishery would not include every current participant—potentially excluding about 20% of fishermen, similar to limitations seen with the current 600-foot fishery. However, location has always been a defining factor in the value of a set net operation.

East Side set netters have already demonstrated adaptability. Many have participated in the commercial dip net fishery when set net opportunities were restricted. Adding beach seining would provide another critical option—allowing fishermen to pivot during times of low king salmon abundance while still harvesting the large surpluses of sockeye returning to the Kenai and Kasilof Rivers.

We have also worked with legislators to explore a voluntary buyback program to reduce fleet size and increase sustainability. However, the financial reality is clear: our fleet has faced dire economic hardship for several consecutive years, leaving many families struggling to survive.

A beach seine fishery will not fully restore our industry. However, it would provide a lifeline—allowing approximately 80% of fishermen the option to remain operational during difficult periods, and giving the Department an additional, effective management tool.

We respectfully ask the Board to consider adopting beach seining as part of a flexible, adaptive management strategy for Cook Inlet.

Thank you for your time and consideration.

Sincerely,

Amber and Travis Every

Name: Cory Loos

Community of Residence: Homer

Hey,

Thanks for the time.

I strongly oppose 192. Due to the fact that this once again does not meet the criteria and it shows how the system is broken.

Regarding 186 petition. I fully support the reverse change of this. The long-term consequences and suffering this will cause to the fisherman, the local community's, jobs and peoples family's is real. 73% of their permits are held by local Alaskan family's. That has to be one of the highest CFEC fisheries permit holders per local residence. Coho is the new metric to close the drift fleet, just how kings was used to close the set nets. Except coho data of all upper Cook Inlet is so incomplete there is no true biological facts to support 186. The state doesn't even have fresh water logbooks for the in river guides anymore. Cook Inlet has the highest in River participation. But yet no accountability for the largest user group with the highest harvest levels. Let's start with real in river harvest data before restricting a commercial fleet anymore. Thank you.

Name: Pauline Mills

Community of Residence: Kasilof

Hi,

My name is Pauline Mills and I am an East Side Set Netter since the 80's. My children were raised commercial fishing and it has been the family business for years until politics ruined the fishery.

I am commenting because I am opposed to proposal 192 for many reasons.

This proposal does not represent all east side set netters but only fisherman with beach nets which viates the rights of the permit holders who have a vested interest in their business. Changing the gear adds expense to the fisherman that already have taken huge losses not to mention that not all fisherman have beach nets. The waste of all the set net gear, boats, etc already adds strain to the business owners. Please consider the fact that this fishery already has had so much taken away and this proposal would continue to take away and change the setnetters way of making a living. Please put proposals in place that safeguard our businesses and make it equal among all the fisherman that have invested in this industry.

Thank you.

Name: Kim Cresap

Community of Residence: Anchorage

I am a 45 year resident of Alaska and am completely in support of the petition repealing proposal 186 /RC 161. I object to the rewrite of the fishery management plan for Upper Cook Inlet in the manner it was done without opportunity to have a proper public process backed up by scientific reasoning. Proposal 186/RC 161 is purely allocative and must be repealed.

Name: Mark Walker

Community of Residence: Matsu

I am in opposition to proposal 186 RC161. I am in support of the petition to remove 186 RC161 because the proper vehicles were not used to make the boards decision on this regulatory measure.

Here are a few reasons why 186 RC161 should be repealed.

1. RC161 was introduced too late for meaningful public participation.
2. The Board voted on late substitute language that still contained drafting and authority problems.
3. The coho conservation record was incomplete, uneven, and internally inconsistent.
4. The Board imposed a disproportionate burden on the one sector with mandatory harvest accounting.
5. The conservation rationale was internally inconsistent with sockeye management needs.
6. Major allocative and economic harm was admitted on the record.
7. The official Department posture was not a full endorsement, yet the Board went further anyway.
8. Recusal and appearance-of-bias concerns undermine confidence in the 4-2 result.
9. The Board appears not to have made a disciplined explicit finding justifying the ACR-toRC161 pivot

Thank you for reading this

Mark Walker



Established 1955

North Pacific Fisheries Association
 P.O. Box 796 Homer, AK 99603
 npfahomer@gmail.com // www.npfahomer.com

Alaska Department of Fish and Game, Board of Fisheries

April 30, 2026

RE: OPPOSE Proposal 192

Dear Chair Van Dort,

The North Pacific Fisheries Association (NPFA) represents commercial fishing participants committed to sustainable, science-based management and a fair, transparent regulatory process. Proposal 192 raises significant concerns related to process, timing, implementation feasibility, and allocation impacts.

Previously Considered and Rejected by the Board

The core language underlying Proposal 192 was previously considered and failed on a 3–4 vote of the Board. Reintroducing substantively identical policy through a Board-generated mechanism circumvents that outcome and undermines the deliberative process.

Procedural Breakdown, Lack of Public Input, Out-of-Cycle Action

The proposal originates from late-breaking record copies introduced immediately prior to deliberation, with no meaningful opportunity for public review. This approach limits transparency prevents informed stakeholder participation and bypasses the standard process for full analyses.

Failure to Achieve Stated Objective

The proposal is intended to enable data collection on post-release survival using beach seines. However, regulatory and permitting timelines make it unlikely that beach seines will be a legal gear type in time for the 2026 season. As a result, no meaningful data collection is likely to occur.

Inequitable and Unworkable Outcome

Many setnet permit holders do not have sites suitable for beach seine operations. This creates a de facto loss of access and an unjustified allocation shift.

Precedent Risk

Adoption would set a precedent that major policy changes can be advanced through last-minute, out-of-cycle Board actions, undermining regulatory stability.

Commercial Fisheries Entry Commission Concerns

The CFEC Memo cautions that Proposal 192, as written, functions as a mandatory gear replacement rather than an optional alternative, raising potential conflicts with the Limited Entry Act. It also highlights risks of inequitable access due to limited shoreline sites and notes that significant regulatory clarification, legal review, and time would be required before implementation.

NPFA recommends the Board reject Proposal 192 and consider any future evaluation of alternative gear types during the regular Upper Cook Inlet cycle. NPFA appreciates the Board's consideration of our comments.

Sincerely,

Malcolm Milne

President, North Pacific Fisheries Association

Name: Bruce Markwood

Community of Residence: Anchorage

Please consider removing 186rc161 as this proposal was not correctly vetted through the public process and creates a major in regulations.

Please consider not passing proposal 192. This gear type has a mortality rate up to 40% of all the fish that are caught. This gear type would also allow only a very few setnetters to participate.

Name: Steve Tvenstrup

Community of Residence: Kenai

I'm commenting on RC161 /proposal 186 . I've participated in the board process since 1986 ,spent numerous days attending 23 board meetings, the process that the board takes to take a agenda change request up from its original form to the end results and change it to an RC that a board member submit and does not give the public a chance to comment on the dramatic changes that took place on RC161 ! I'm in full support of the petition to reconsider . This should have been put on hold until the regular meeting in 2027 where the public could submit comments and attend the committee meetings to defend their concerns.

Thank you for the opportunity to comment on this issue .

Name: Christopher Leuci

Community of Residence: Soldotna

186RC161, I support the elimination of RC 161. Given the ongoing concerns involving lawful infringements, process failures, data issues, and alleged ethics violations by certain members of the Board, I believe it is in the best interest of the public, the fisheries, and the State of Alaska for these initiatives to be repealed and reconsidered through a lawful, transparent, and properly supported process.

Name: LARRY CONKLIN

Community of Residence: ABERDEEN, WA

Remove 186RC161

This is primarily an allocation issue and as such should not have been considered in an out of cycle session per your own rules. BOF already has a severely tarnished image and this maneuver is a step to far. Cook Inlet is held up as a warning across the state of what can happen if politics is allowed to be the driving factor in fisheries management. Do better.

Cook Inlet will be up this coming cycle. Follow the rules and normal procedure and consider it then. There was no compelling evidence presented that would show that waiting a few months would be of any consequence.

Follow the the rule. Follow normal procedure Remove 186RC161 .

Name: Deborah Anderson

Community of Residence: Homer

I suggest that you strongly consider the proposal submitted by Chelsea Johnson “PETITION TO REPEAL THE REGULATORY AMENDMENTS ADOPTED THROUGH PROPOSAL 186 / RC161”.

A lot of time and consideration has gone into this proposal to repeal proposal 186/RC161. This subject should not be taken lightly.

Thank you for your time!

Deborah Anderson

PETITION TO REPEAL THE REGULATORY AMENDMENTS ADOPTED THROUGH PROPOSAL 186 / RC161

Submitted to the Alaska Board of Fisheries under AS 44.62.220 and the Joint Board Petition Policy

Requested action	Repeal the amendments to 5 AAC 21.353 adopted through Proposal 186 as amended by RC161 and restore the prior Central District Drift Gillnet Fishery Management Plan unless and until any replacement is adopted through the normal Upper Cook Inlet cycle with full public notice and meaningful opportunity to respond.
Petitioner	Chelsa Johnson, F/V Nightstalker, F/V Jaws
Date	April 4, 2026 - revised version
Attachments	Formal Objection Letter; BOF Transcript Review; Cook Inlet Coho Data Review; ADF&G Staff Comments for Proposal 186; updated supporters pages; supporting correspondence including UFA emails dated March 29 and March 30, 2026; April 3, 2026 Area M complaint for legal-theory context.

This petition is submitted in conjunction with my prior formal objection letter and the attached supporting exhibits. Proposal 186 / RC161 should be repealed because the Board converted an out-of-cycle conservation vehicle into a materially allocative rewrite of Cook Inlet drift management through substitute language introduced after public testimony had closed, on a coho record that was mixed, incomplete, and internally inconsistent, while the Department openly acknowledged that the measure would also reduce its ability to manage Kenai and Kasilof sockeye.

The Board’s own record does not show a disciplined, transparent, and proportionate basis for what it did. Instead, it shows procedural ambush, acknowledged drafting and implementation problems, major admitted allocative harm, and outcome-determinative appearance concerns in a 4-2 vote with one recusal. Repeal - not post hoc rationalization - is the appropriate cure.

I. Requested Board Action

- Repeal the amendments to 5 AAC 21.353 adopted through Proposal 186 as amended by RC161.
- Restore the prior Central District Drift Gillnet Fishery Management Plan language unless and until any replacement proposal is adopted through the normal Upper Cook Inlet cycle with full public notice, timely substitute language, and a meaningful opportunity to respond.
- If the Board declines immediate repeal, schedule this petition for public hearing as required by the Joint Board Petition Policy and provide a written explanation identifying the specific compelling new information relied upon and the reasons narrower alternatives were rejected.
- Preserve and release the full administrative record, including all RCs, written findings, vote explanations, conflict disclosures, ethics determinations, and all materials relied upon in adopting RC161.

II. Principal Grounds for Repeal

A. ACR 5 was used to carry a materially allocative rewrite.

Proposal 186 began as out-of-cycle ACR 5. The final substitute language in RC161 went far beyond a narrow conservation correction. It repealed Area 1, removed management options such as Area 2 and Anchor Point, changed the one-percent rule to a three-percent rule for part of the season, imposed Tuesday and Friday windows, and created a two-mile shoreline prohibition. This was a major rewrite of the drift management plan, not a housekeeping fix.

Board Member Tom Carpenter stated on the record that RC161 was “quite different” from the ACR language, that the substitute had become “very allocative,” and later that it was a “highly allocative proposal.” Those are direct admissions that an out-of-cycle conservation vehicle was used to carry a materially allocative rewrite.

Record points: Carpenter, 27:57-28:25: “this language in RC 161 is quite different from the ACR language.”

Record points: Carpenter, 30:11-30:27: “this substitute language has now become very allocative.”

Record points: Carpenter, 52:37-53:53: “I do think this is a highly allocative proposal.”

Record points: March 29, 2026 UFA email from Matt Alward: UFA agreed “ACR 5 should never have been adopted in the first place.”

B. RC161 was introduced too late for meaningful public participation.

The clearest process defect is timing. Proposal 186 was immediately moved in substitute form as RC161 after public testimony had already occurred on a materially different proposal. Carpenter stated on the record that he did not receive the substitute language until that morning and that the public had commented on something different from what the Board was actually voting on. He expressly said that “the public process is lost to a certain degree.”

That defect was compounded when the Board amended RC161 again on the floor before final action. The public testified on one version, the Board voted on another, and then it corrected drafting language on the fly. That is procedural ambush, not fair notice and meaningful participation.

UFA President Matt Alward separately confirmed in writing that RC161 was entered into the record only minutes before deliberations started and that there was no time to submit a response RC before the Board deliberated.

Record points: Carpenter, 39:25-40:24: “we have substitute language that I didn’t get until this morning... the public process is lost to a certain degree.”

Record points: Alward email, March 29, 2026: RC161 entered “minutes before deliberations started... so no one had any opportunity to comment.”

C. The Board voted on late substitute language that still contained drafting and authority problems.

Even after the substitute arrived late, the Board found an internal problem in RC161 and amended it on the floor. Svendsen acknowledged that there was “something a little funky” in the language under D1. At the same time, the Commissioner raised uncertainty about whether striking the commissioner-authority provision would impair his ability to manage lower run-strength situations and meet inriver objectives.

A sweeping rewrite should not be adopted through a substitute that still contains drafting defects and unresolved management-authority questions at the moment of the vote. This was not disciplined rulemaking.

Record points: Svendsen, 47:15-47:23: “there’s kind of something a little funky that I see under D1.”

Record points: Commissioner, 33:34-34:23: asked whether he could still restrict time at low run strengths to meet inriver goals and said, “I need a little bit of guidance from you on that one.”

D. The coho conservation record was incomplete, uneven, and internally inconsistent.

The Board justified RC161 as a coho conservation measure, but the coho record it relied on was not a clean and uniform basis for a sweeping rewrite. ADF&G’s own Proposal 186 staff comments state that Deshka River coho weir counts have been incomplete since 2020 and represent only a minimum count of escapement. They also state that Little Susitna counts were incomplete from 2021 through 2024. That alone should have counseled caution rather than acceleration.

The same staff comments also say Fish Creek counts were completely enumerated since 2020 except for 2022 and that the escapement goal was achieved or exceeded in each completed year, and that the Jim Creek foot survey has been completed each year since 2020 and the escapement goal has been achieved or exceeded in each of those years. In other words, the four-goal-system record is mixed, not a uniform collapse.

Table 186-15 is even more troubling. The table marks numerous values with footnote “c,” defined as “incomplete count.” The table flags Little Susitna passage counts as incomplete in

2018, 2019, and again in 2021 through 2024, while the narrative discussion focuses on 2021-2024. The table also flags Deshka passage counts as incomplete from 2020 through 2025. A record that repeatedly acknowledges minimum or incomplete counts in the very systems used to justify emergency-style restrictions is not the kind of record that should support a last-minute, highly allocative rewrite.

Record points: ADF&G staff comments: Deshka counts incomplete since 2020 and “represent a minimum count”; Little Susitna counts incomplete 2021-2024; Fish Creek and Jim Creek achieved or exceeded goals in completed recent years.

Record points: Table 186-15 footnote: “c Incomplete count.” The table marks multiple Little Susitna and Deshka entries with that notation.

E. The Board imposed a disproportionate burden on the one sector with mandatory harvest accounting.

Commercial harvest is documented through fish tickets. The attached Cook Inlet Coho Data Review confirms that the commercial coho series is hard-counted through fish-ticket reporting. The same review confirms that sport harvest comes from the Alaska Sport Fishing Survey - an estimate system - and notes that guided freshwater logbooks were available from 2006 through 2016 while saltwater logbook reporting continues. The issue is not that sport data are worthless; the issue is that the accounting methods are different and not directly apples-to-apples.

That matters because the Board imposed disproportionate restrictions on the one sector with mandatory harvest accounting while relying on a coho conservation record that was not only mixed and incomplete in key systems but also not built on equal accountability across all user groups. If conservation is the stated reason for taking opportunity away from one fleet, the Board should insist on stronger and more standardized cross-sector accountability before it does so.

Record points: Cook Inlet Coho Data Review: commercial landings come from fish tickets; sport harvest is survey-based; guided freshwater logbooks were available from 2006-2016; saltwater logbook reporting is ongoing.

Record points: The coho review expressly cautions that the available uploaded sport exports are not a clean Cook Inlet-only freshwater-versus-saltwater split for exhibit-grade one-to-one comparison.

F. The conservation rationale was internally inconsistent with sockeye management needs.

The Department stated on the record that adoption would likely reduce drift harvest, increase salmon moving into the Kenai and Kasilof, and reduce the Department’s ability to achieve sockeye escapement and inriver goals. Godfrey then asked whether that meant over-escapement would become more likely, and the Department’s answer was yes. Yet the same deliberation downplayed over-escapement as not presently causing a demonstrated loss of productivity, and Svendsen said he did not personally believe in over-escapement in this system.

Those positions are not coherent together. The Board relied on coho conservation to remove one of the Department's main sockeye management tools at the same time the Department was acknowledging that the proposal would make sockeye control harder.

The staff comments strengthen this contradiction. They state that from 2015 to 2024 the Kenai River late-run sockeye inriver goal was achieved once and exceeded nine times, and that the sustainable escapement goal was achieved three times and exceeded seven times. The same table shows a preliminary 2025 sonar count of 4,252,497 fish. This is not a record that supports casually taking away harvest tools while dismissing management concerns about fish moving well above target ranges.

Record points: Department summary, 2:17-2:43: adoption would likely increase salmon moving into Kenai and Kasilof and reduce the Department's ability to achieve sockeye goals.

Record points: Godfrey questions, 20:39-22:15: staff confirmed the practical issue was more fish moving upriver and greater over-escapement risk.

Record points: Commissioner, 22:18-22:28: "we're not concerned about over escapement... We haven't yet seen a loss of productivity with over escapement."

Record points: Svendsen, 8:19-8:41: "I don't personally believe in this over escapement."

Record points: ADF&G staff comments: from 2015-2024 the Kenai late-run inriver goal was achieved once and exceeded nine times; 2025 preliminary sonar count shown as 4,252,497.

G. Major allocative and economic harm was admitted on the record.

The Board and staff repeatedly acknowledged that RC161 would have major allocative and economic consequences. Staff estimated that, using last year as an example, lost sockeye harvest could be about a million fish. Carpenter then placed on the record that the proposal was highly allocative and would result in significant lost harvest to the commercial fleet and regional economic harm.

Those admissions matter because they confirm that the allocative effect here was not incidental. It was large, foreseeable, and central. A regulation with that kind of acknowledged effect should not have been rushed through an out-of-cycle process on substitute language that arrived too late for meaningful public response.

Record points: Staff, 31:54-32:03: using last year as an example, lost sockeye harvest could be "about a million fish give or take."

Record points: Carpenter, 52:37-53:53: "there will be a significant amount of lost harvest to the commercial fleet specifically with sockeye" and an effect on the regional economy.

H. The official Department posture was not a full endorsement, yet the Board went further anyway.

The official statewide summary of department positions lists Proposal 186 with a neutral position. The detailed staff comments express concern about consistently achieving Doshka and Little Susitna goals and support regulations that improve coho conservation, but they also state that impacts of both state and federal fisheries should be evaluated in tandem and

that the Department is neutral on the allocative aspects. That is not a clean departmental endorsement of a sweeping rewrite like RC161.

The Board nevertheless went farther than a cautious, discipline-first record would justify.

Record points: ADF&G staff summary table for the March 17-21, 2026 statewide meeting lists Proposal 186 with Department Position “N” (neutral).

Record points: Detailed staff comments: the Department supports regulations that improve coho conservation, impacts of state and federal fisheries should be evaluated in tandem, and the Department is neutral on allocative aspects.

I. Recusal and appearance-of-bias concerns undermine confidence in the 4-2 result.

The transcript confirms one actual recusal: Mike Wood recused himself and left the table before Proposal 186 was taken up. The final vote was 4-2 in favor, with Godfrey and Carpenter voting no; Chamberlain, Irwin, Svendsen, and Carlson-Van Dort voting yes; and Wood recused. In a vote that narrow, any additional recusal, outcome-determinative appearance problem, or unresolved disclosure issue matters enormously.

The transcript preserves a serious appearance issue around Svendsen. He was the Board member driving RC161. He told the Board the issue was “close to my heart.” Godfrey then reminded the Board that Svendsen had previously said that if he had it his way he would eliminate all commercial fishing in Cook Inlet. Svendsen responded by saying he “misspoke” and meant gill nets/set nets. Whether or not that exchange proves a formal ethics violation, it undeniably raises predetermination and appearance concerns in one of the most controversial Cook Inlet proposals in years.

The attached April 3, 2026 Area M complaint - a pleading, not a court ruling - advances the theory that under AS 16.05.320 a majority of the full seven-member Board must still vote in favor even where recusal occurs. If that theory is correct, any additional recusal that should have occurred here would have been outcome-determinative. At a minimum, these appearance issues are another reason to repeal first and litigate later, rather than force a season under a cloud of avoidable distrust.

Record points: Wood, 0:03-0:11: “Time to recuse myself.”

Record points: Final vote, 56:01-56:25: Godfrey no; Chamberlain yes; Irwin yes; Carpenter no; Svendsen yes; Carlson-Van-Dort yes; Wood recused.

Record points: Svendsen, 4:43-4:51: the issue is “close to my heart.”

Record points: Godfrey, 22:35-23:05: reminded the Board that Svendsen had said he would eliminate all commercial fishing in Cook Inlet; Svendsen, 23:14-23:36: said he meant gill nets/set nets.

J. The Board appears not to have made a disciplined explicit finding justifying the ACR-to-RC161 pivot.

During deliberations, Carpenter asked the Department of Law whether the Board was on firm footing given that RC161 was quite different from the ACR language. Department of Law responded that the Board could make a finding through the discussion - either that the

matter remained grounded in conservation or that there was compelling new information driving consideration of the new RC language.

The Board then moved into merits discussion and ultimately voted, but the transcript does not preserve a clear, disciplined finding identifying the specific “compelling new information” that justified turning an out-of-cycle ACR into a late, highly allocative substitute rewrite. The absence of a clear articulated finding is itself a serious weakness in the rulemaking record.

Record points: Department of Law, 28:48-29:44 and 30:34-30:47: the Board could make a finding that compelling new information or ongoing conservation concerns justified the RC language.

Record points: The transcript then proceeds to substantive discussion and final vote without a clear, separately articulated finding identifying that new compelling information.

III. Repeal, Not Delay, Is the Appropriate Remedy

The right response to this record is repeal and reset. Proposal 186 / RC161 is not merely controversial. It is procedurally defective, factually uneven, and openly allocative. It rests on late substitute language, an incomplete and inconsistent coho record in the very systems most heavily invoked, acknowledged drafting and authority problems, and a set of on-the-record admissions showing that the measure would both cause major economic harm and reduce the Department’s ability to manage sockeye as intended.

The Board should not force fishermen, families, communities, processors, and local governments into the 2026 season under a regulation adopted this way. Repeal restores the status quo and allows any future proposal to be brought through the regular Upper Cook Inlet cycle with full public notice, timely substitute language, transparent findings, and a record strong enough to support whatever action the Board ultimately believes is justified.

IV. Specific Requests for Written Response

1. State whether the Board will repeal the amendments adopted through Proposal 186 / RC161 and restore the prior regulatory language.
2. If the Board declines repeal, state whether it will schedule this petition for public hearing under the Joint Board Petition Policy.
3. Identify the exact compelling new information, if any, that the Board believes justified the ACR-to-RC161 pivot.
4. Identify whether the Board believes RC161 remained a conservation measure, became predominantly allocative, or both, and explain why.
5. Release the full administrative record, including all RCs, conflict disclosures, ethics determinations, written findings, and vote explanations.
6. State whether the Board will revisit its procedures for late substitute language, out-of-cycle matters, and public notice before the next Cook Inlet cycle.

Respectfully submitted,

Chelsa Johnson | F/V Nightstalker, F/V Jaws | 907-740-1877 | Chelsa6575@gmail.com

Name: Josh Newton

Community of Residence: Soldotna

Hi I would like to comment on proposals 161/186-192, my name I Josh newton I have been both sport and commercial fishing in Cook Inlet i would ask the board to please do away with proposal 161/186 due to lack of public process and I would like to oppose proposal 192 as it doesn't allow for every permit holder To participate in the fishery wether due to cost of Gear start up or location.

Name: Roland Maw
Self and family members

Community of Residence: Kasilof

Support the petition to repeal Proposal 186 and the RC161 replacement.

Just repeal Proposal186 and RC161.

There were 6 substantive changes in RC161 that were not in Proposal186 these six new management changes are: 1 to 3% , closing area 1 for the entire season, closing Anchor Point area, restricting commercial fishing to the Expanded Corridors, including the Kenai River Kenai and failure to address Areas 3&4.

Name: Roland Maw

Community of Residence: Kasilof

The petition regarding Proposal 186 and RC161 are not specifically identified in the proposal cemmments?

Donot support BOF generated proposals

Name: Lori Little

Community of Residence: Upper Cook Inlet Drift Gillnet Fleet

I am writing to support the petition to repeal proposal 186RC161.

Name: Audrey Salmon

Community of Residence: Kenai

I oppose proposal 186 and RC161 that restrict Cook Inlet drifters. Illegal, no public input, VERY allocative against one user group.

Name: Tony Little

Community of Residence: Upper Cook Inlet Drift Gillnet Fleet

I am writing to send my support for the proposition to repeal proposal 186RC161.



**CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565**

April 30, 2026

Märit Carlson-Van Dort

Chair, Alaska Board of Fisheries

marit.carlson-vandort@alaska.gov

Subject: Support for Board of Fisheries Proposal 189 on Traditional Knowledge

Dear Chair Carlson-Van Dort:

The Chignik Intertribal Coalition (CIC) comprises the federally recognized tribes of Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay, and Perryville. We are writing in support of Board of Fisheries Proposal 189. Proposal 189 would add a new regulatory section on consideration of Traditional Knowledge in the Board's process.

Immediately following Statehood, those assuming federal research and management roles were highly dependent on the expertise of local residents living near the fishery resources. This engagement involved frequent local exchanges and discussions, with the information shared understood to be accurate.

However, as State fishery researchers and managers built their own knowledge base, they gradually began to overlook and ultimately discount local knowledge. Decades have since passed, and significant staff turnover has resulted in further professional loss of personal information. Consequently, the Department is now almost entirely reliant on its own written records and databases.

Despite this shift, valuable local and traditional knowledge remains available, provided we cultivate more opportunities for those exchanges to take place.

Integrating Traditional Ecological Knowledge improves fisheries management by combining generational insights on ecosystems and fish behavior with western science. This holistic approach fosters inclusion, reduces proposal divisiveness, and ensures management strategies respect Alaska's unique ecological and cultural contexts.

Having advocated for the Board's inaugural Policy on Traditional Knowledge during the 2024 Kodiak meeting and subsequent sessions, we support Proposal 189. Formally requiring the Board to incorporate Traditional and Local Knowledge into its deliberative process represents a commitment to good governance. Such an approach ensures more comprehensive discussions and ultimately produces more effective management outcomes for Alaska.

Respectfully,

A handwritten signature in cursive script that reads "George Anderson".

George Anderson, President

Name: Doug Frasher
Cook Inlet Drift Permit Holder

Community of Residence: Soldotna

Doug Frasher
Cook Inlet Drift Permit Holder
Proposal 186RC161

I support the petition submitted by Chelsa Johnson to remove 186RC161 for all the reasons stated in the petition.



April 30, 2026

Name/Organization: Northern Alaska Environmental Center

Proposal Numbers: 189, 190, 191, 192

Proposal 189 – Support

We support Proposal 189. Traditional Knowledge and Local Knowledge are essential to understanding fisheries, salmon declines, and ecosystem change across Alaska. Communities with long-standing relationships to salmon often hold observations and knowledge that can strengthen Board decision-making.

We encourage the Board to ensure that Traditional Knowledge is meaningfully considered in management discussions, not only received as testimony.

Proposal 190 – Concern / Oppose unless amended

We have concerns with Proposal 190 as written. While a management plan for Yukon River king salmon may provide structure, Yukon River communities have already experienced years of severe subsistence restrictions due to salmon declines.

The causes of the Yukon king salmon crisis extend beyond in-river harvest and include broader ecosystem, climate, and ocean conditions. A management plan should not place disproportionate conservation burdens on subsistence users without fully acknowledging these larger drivers.

Proposal 191 – Concern / Oppose unless amended

We have concerns with Proposal 191 as written. We support rebuilding Yukon River fall chum salmon and meeting escapement goals, but management must also recognize the severe food security, cultural, and economic impacts already experienced by Yukon River communities.

When harvestable surpluses exist, meaningful subsistence opportunity should remain a central management objective. Any stock of concern plan should avoid further institutionalizing restrictions on subsistence users without addressing broader causes of decline.

Proposal 192 – Neutral / Support with caution

We are neutral on Proposal 192, with caution. We support exploring selective gear types that may reduce king salmon mortality while allowing fishing opportunity. However, if set beach seines are authorized, the Board should require strong monitoring and evaluation to ensure the gear reduces mortality as intended and does not create unintended conservation impacts.

Thank you for considering these comments.

A handwritten signature in black ink, appearing to read "Krystal Lapp".

Krystal Lapp, Interim Executive Director

830 College Road
Fairbanks, Alaska 99701-1535
(907) 452-5021
www.northern.org
EIN: 23-7438038

Name: Tony Little

Community of Residence: Eufaula Ok

My family and I support the petition to repeal proposal 186RC161.

The Board of Fish must comply with the law and do the right thing. There is enough rule breaking and manipulation in this world so let's start doing things right and start respecting the process.

Name: Alexander Reutov

Community of Residence: Homer Ak

Hi Board of Fish members

I writing with broken heart , of what was just passed by some board members , this should've never happen.

I oppose RC161/proposal 186 .

It was out of cycle , not enough information , lack of public notification , more restrictions was added , without public knowledge , it was an ambush on commercial fishermen. It's illegal on so many levels.

It needs to be removed , immediately !

Alexander I Reutov

F/V Denali

Name: Trofim Martushev

Community of Residence: Wasilla Ak,

Hi. I'm opposing the proposal 186. There wasn't no time for public input. Allocative nature and public support for this. So no to 186



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

April 29, 2026

Ms. Marit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: UFA opposition to Proposal 192

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

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 36 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

Our membership is opposed to the adoption of Proposal 192 which would eliminate the setnet fishery from the Kenai River Late-run King Salmon Stock of Concern Management Plan, and any amendment that broadens this proposal to further restrict or eliminate any commercial gear type in Cook Inlet regulations.

The Board has repeatedly taken actions to curb public participation by commercial fishermen, which is extremely poor process. Proposal 192 affects only a single user group and is therefore entirely allocative in nature. Proposals of this kind should *only* be considered during the regular cycle, when the Board is simultaneously reviewing escapement goals, stock of concern recommendations, and other comparable measures. Addressing an allocative proposal outside of that context undermines a balanced and transparent decision-making process.

During the Statewide meeting, the Board did not provide advance notice of its intent to create a Board Generated Proposal related to the Cook Inlet setnet fishery. Instead, the proposal appeared on an agenda posted during a brief 15-minute pause before miscellaneous business. This lack of prior notice significantly limited the public's opportunity to engage in the process.

The Board's decision to develop this proposal without prior public notice and to vote on it outside of the regular cycle, without the opportunity for in-person public participation, just prior to the start of the salmon season is appalling. Each of these actions has effectively excluded the public from meaningful participation.

CFEC's April 6th letter to the Board on Proposal 192 outlines two possible violations of the Limited Entry Act and economic impacts to fishermen, processors, and communities.

Proposal 192 was partially adopted to allow fishermen to sell fish harvested using beach seines under a commissioner's permit. However, this situation stems from the Board's action on Proposal 313 in 2025, which shifted from allowing beach seines under the S04H permit to replacing setnet gear entirely, and was ultimately voted down. As a result, beach seines were left unable to sell fish, even under a commissioner's permit. According to CFEC, even if Proposal 192 is adopted, S04H permit holders will likely remain ineligible to sell fish caught using beach seines this year. The letter indicates that the proposal may conflict with the Limited Entry Act, as replacing one gear type with another effectively creates a new fishery requiring limitations proceedings.

The letter also raises concerns that the proposal ties gear authorization to the lease site rather than the permit itself, which is inconsistent with the Limited Entry Act.

There are 730 active S04H permits in Cook Inlet, 84% of which are held by Alaska residents. Proposal 192 could eliminate the majority of these small, locally owned businesses. Fewer than 25% of existing lease sites are suitable for beach seine operations, and permit holders were given very little notice that their livelihoods and permit values could be significantly impacted.

The letter highlights the substantial cost and problematic timeline of acquiring seine gear, placing an additional burden on an already economically strained fleet.

Proposal 192 is an allocative action, not a conservation action. The proposal prohibits retention of king and coho salmon from beach seines, and board discussion on the BGP indicated an intent to pass more coho into Northern Cook Inlet. However, ADF&G's statewide comments note that the only two coho index streams that have recently fallen short of escapement goals—the Deshka and Little Susitna Rivers—have not been fully enumerated in the past five years due to flooding and infrastructure damage. *These counts represent minimum estimates.* The two other index streams, including Jim Creek and Fish Creek, have met escapement goals. In light of this, **Proposal 192 is not a conservation measure, but rather an allocative measure, as it removes the ability of S04H permit holders to retain and sell coho salmon regardless of actual stock abundance, at a time when no coho stocks are designated as stocks of concern.**

Proposal 192 imposes additional restrictions solely on commercial fisheries under the Kenai River Late-run King Salmon Stock of Concern Management Plan. The escapement goal for this stock has been met in five of the last nine years, and the Board has repeatedly increased escapement target ranges beyond what ADF&G deems necessary. At the same time, these actions have complicated efforts to manage sockeye escapement in the Kenai and Kasilof Rivers. Chinook salmon exploitation rates have remained below 5% across all fisheries since 2020, and the 2024 Upper Cook Inlet commercial harvest totaled just 169 fish—97% below the previous 10-year average. Given this minimal impact, eliminating an entire setnet fishery and the economic contributions it provides to Kenai Peninsula communities appears unnecessary and disproportionate.

It is also important to note that all Chinook salmon harvested in commercial fisheries are fully accounted for, whereas sport fish harvest estimates rely heavily on voluntary reporting under the statewide survey and limited creel sampling. *Sport harvests are undercounted.*

The Board needs to consider the harm it already inflicted to Cook Inlet commercial fisheries during the Statewide meeting—including reduced fishing time, three permanent area closures, and increased restrictions in August—have already had a significant negative impact on 560 drift gillnet permit holders and processors. Eliminating the setnet fishery does not constitute conservation; it is the continuation of targeted actions against the commercial sector that supports the Kenai Peninsula.

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 • Ekuk Beach Fishermen's Association • 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

Name: Russell Clark

Jesse Wallace, Guy Chow, Tyler Presley, Cheryn Clark, John Bailey, Author Brown, John Manly, Russell Clark, Whitney Clark, Cayleigh Clark

Community of Residence: Kenai

Proposal 192- Oppose

We would like the Board of Fish members to know that any comments, suggestions, or amendments to Proposal 192 made by the Kenai Peninsula Fisherman's Association were made without the input of its membership at large or without the input of the SO4H permit holders at large. KPFA did not put out notice via email, their Facebook page, or public notice to ask for input on implementation of beach seines or Proposal 192 or to notify its membership of the need to submit public comment on Proposal 192. The board members of KPFA that are formulating comments or amendments for Proposal 192 all have an interest in advancing beach seines and have beach sites. Thus far, opposition on beach seines have been excluded from KPFA board meetings and no general or open meetings by KPFA have been made available to advance opposition to beach seines. KPFA in this regard has failed its membership and the setnet community as a whole. Therefore, comments, amendments, or any support for Proposal 192 or beach seines by KPFA should be considered by the BOF as generated by KPFA board members only.

Name: Alex Sanarov

Community of Residence: Homer

I oppose RC161/Proposal 186 due to lack of public input, allocative nature, out of cycle. Should have proper data to start even closing down areas. We need public point of view, behind voting n shutting out people's opinions shouldn't be allowed. Also i support the petition sent in by Chelsa Johnson. Please look it through properly

Name: George Savelieff

Community of Residence: Oregon

We are all hoping 186 does not go through or get signed other actions can be taken instead of just closing an area blaming only one source the gillnetters most of the season we don't get to fish in those areas it mainly is in the corridors so closing it would not make sense we believe there are way more other factors than just the drift fleet.

Couple years ago the sockeye runs were small and with great management those numbers came back stronger. Issue like these should be advised with all people commercial and sport and resident. The proposal 186 seems very out of place and 1 sided. Thank for your time hope this issue can be resolved in different way thank you

Name: Franz Schonberg

Community of Residence: Petersburg

To the Board,

I am not a Cook Inlet fisherman nor have I ever commercially fished in Cook Inlet.

I am a Bristol Bay S03T permit holder and lifelong Alaska commercial fisherman and I attended the Bristol Bay meetings in January. This experience showed me the challenges that face the board and making decisions that benefit the whole as opposed to any one particular user group.

As a lifelong Alaskan commercial fisherman I am in support of all coastal commercial fishing communities and I am aware of the challenges the industry has gone through over the last decade. I am in support of my brothers and sisters who risk their lives and time away from family to provide the healthiest form of protein in the planet. Wild Alaskan seafood is a staple this country has the privilege of enjoying. To be completely blunt, I was disappointed in the board's decision making process regarding proposal 61 during the Bristol Bay finfish meetings this winter. I felt that the board ignored the public; regional, local and domestic user groups, as well as their own department scientists and other locally supported scientific groups to pass changes that only one user group supported out of the wholistic picture. The board did not allow for public comment on the RC that was passed as pointed out by the board member Godfrey who voted no.

I have been following the board process on passing proposal 186 RC 161 very closely.

I am a Bristol Bay S03T permit holder and lifelong Alaska commercial fisherman and I see this similar pattern, occurred to my fellow harvesters in Cook Inlet.

Arguably to a much greater negative impact to the commercial fleet as what was passed in Bristol Bay. There was no opportunity for public comment and there were huge changes made with little scientific data to back the decision.

This pattern is a disgrace to the hard working commercial fishing families in this state. I request that the board repeal the hasty approval on proposal 186 RC 161 and apologize to the public for disgracing the office in which you all signed up for to act with integrity and honor and to approach issues with a wholistic approach that balances all user groups.

I thank the board members, who are acting with integrity to support the bigger picture, for their time on the board.

Name: Dan Anderson
paragon fish corporation

Community of Residence: Homer

proposal 186-RC161 completely went around the public process. So much so I decided not to run for re-election on the Homer AC of which I have been a member for 12-14 years. I represented the Homer AC at numerous Board of Fish meetings, which comes at a personal cost, I also attended a number of other Board of Fish meetings on my own behalf. I find the inability to comment on the proposal being voted on is a complete disservice to the public and the citizens attending the meeting. The Board has an obligation to make some unpopular decisions at times, I totally understand this fact in the spirit of conservation. What got voted on went far beyond the spirit of conservation, with some limited data and not complete data. I respectfully request that the Board of Fish repeal the outcome of 186-RC161 in it's entirety.

Proposal 192 ventures into lots of uncertainty regarding the set net fleet for many reasons. To name a few items of concern for me not all beach sites are favorable to the seine gear that is in the proposal. What happens to the sites that the seine gear is not an option? It sounds like to me that if this were to move forward a very limited number of limited entry permits will be able to actually fish. If beach seines were to replace set net gear what becomes to all the set net gear and equipment that is needed to efficiently operate a set net site? As with most commercial fishing operations the permit holders have a considerable investment in the equipment it takes to operate this fishery. Fairness comes to my mind, or should I say lack of fairness. Do we know if a Chinook that is bagged up in a seine and released, does it successfully spawn, or not? The list of unintended consequences goes long with this concept. It's unfortunate that Chinooks for the most part Pacific wide, are having a challenging time with replacing themselves. If in anyway possible by allowing beach seine gear would eliminate set net gear in cook Inlet or elsewhere I strongly urge the board not to pass this proposal

Name: Calen Smith

Community of Residence: Kasilof AK

I ask the board to recind proposal 186RC161.

The commissioner does not need to have his EO authority further restricted while the eastside rivers face ongoing overescapement due to the elimination of the set net fleet and ongoing high returns.

Name: Teague Vanek

Community of Residence: Ninilchik, Alaska

Board of Fisheries,

I strongly urge you to remove/nullify Proposal 186/RC161 at the May 1st meeting. The underhanded way that the BOF has lately taken up out of cycle proposals and used last minute replacement language for proposals has been exemplified with this action which has caused an extreme lack of faith in the BOF process. Notice of these tactics has been taken by people statewide and there's a growing concern that the BOF has been doing great disservice to our fisheries and to the State of Alaska. Because of these tactics, people have had to undertake expensive lawsuits with more likely to come. A good first step is your reconsideration of this action. Please follow through and repeal the out of cycle action taken at the March meeting and repeal Proposal 186/RC161.

Thank you, Teague Vanek

Name: Carmen Hollier

Community of Residence: Kenai peninsula

Aloha,

My name is Carmen Hollier. I oppose proposal 192. I am nine years old. I will be turning ten this coming June. I am so excited to turn ten so I can finally get a permit card in my name, just like my grandpa, dad, mom, brother and sister. I have been looking forward to being a set netter for as long as I can remember.

I understand I am only 9, but I do understand what it means to be honest and do the right thing. I also understand patience and waiting your turn.

I know my family is not allowed to Set Net until there are enough kings that swim up the river. I also understand there are other ways we can catch Sockeye Salmon while we wait for the Kings. I have helped my family Beach Seine and Dip Net the last couple of summers. We caught some Sockeye, had some fun and too. I am excited to catch more Sockeye this summer. I am happy to Seine and even dip the fish while we wait patiently for the Kings to come up river, but when the goal is met and the kings are there, I want more than anything to be able to set net with my family. This is the right thing to do. Please do not get rid of Set Netting in Cook Inlet. Beach Seining can be an alternative to Set Netting but not a replacement.

Thank you for taking the time to read my testimony. I hope the right choice is made and my family can continue to Set Net for many years to come.

Sincerely,

Carmen Hollier

Name: larry reutov

Community of Residence: Sterling

I oppose RC161/Proposal 186 due to lack of public input, allocative nature, out of cycle and support Chelsa's petition. There is no box to support or oppose 186 since this was just added.

Name: Bruce Manley

Community of Residence: Kasilof, AK.

My family is strongly against Proposition 192. Prop 192 would wipe out 90% of setnetters. I have been setnetting for over 50 years. I've included brother, uncles, cousins, children, & all sorts of deckhands in the business. They have all been able to make their lives better due to what wages they have made. Your plan is to dispose of us like garbage. Setnetters have the highest year round residency then any other fishing group. The king salmon are starting to come back slowly. Trawlers are still catching 40,000 kings a year in Alaska waters. Yet you target the setnetters. Beach seining has been tried in the Columbia & Frazier Rivers & the king salmon did not fair well. They had a high mortality rate. Why would you try something that has failed elsewhere & records to prove it? PLEASE RECONSIDER AND Vote NO ON PROPOSITION 192!

Name: Si eryan Basargin

All of the Cook Inlet Drift Fleet

Community of Residence: Homer, Alaska

To the BOF and whom else it may concern,

Please refer to Chelsa Johnson's Petition for a more detailed reasoning for my objection to Proposal 186 today. Hundreds of drift boat operations are 100% in support of the petition to REPEAL the BOF's illegal decision regarding proposal 186.

On a more personal level, while listening to the whole meeting live on YouTube for a full 3 days, I cannot count how many times I almost threw my screen device into the bin from disgust for the actions of the blatantly biased Board Members, ON RECORD, with zero concern for their actions.

After a record setting season in 2025, not only was the allocative decision ILLEGAL, it was a deliberate steamroll over a particular user group simply to allocate more fish to the biased members' supporters in the recreational and subsistence groups. The State Law clearly PROHIBITS such behavior and it is an absolute outrage that these members are willing to publicly disregard the laws in the books. If you shut down the drifters due to a lack of particular species, then by law, the other user groups should follow the same. Of course, that is not the case. Coho fishermen would continue to pillage the rivers while the drifters are losing their boats, permits and livelihoods to drastic cuts done out of spite.

A board member is on RECORD dreaming about how he would love to see the commercial fleet SHUT DOWN COMPLETELY! How can someone like that sit there and pretend to be fair???

One of the board members recused himself from voting on 186 because he has a set net site that barely produces much of an income due to ethics rules.

Let's talk about ethics! How many of the four members that voted in support of 186 (to drastically punish the commercial fleet by banning Area 1, changing the 1% rule to 3%, shutting down Tuesdays and Fridays, and so on...) have bought a sports fishing license in the past, or picked up a subsistence permit? If the set netter is not allowed to vote, how are THE REST of them allowed when CLEARLY they are voting in their own best interest and are by no means NEUTRAL on the issue!!?

Where is the evidence that the commercial drift fleet is responsible for the lower counts of these particular coho in these particular rivers? Where is the data that directly points to the drift fleet?

Why choose to ramrod this through OUT OF CYCLE and not wait until 2027, so that we, the public, can have time to collect the NECESSARY data to make a fair and science based decision?

And how the heck was the proposal that was voted on changed so drastically, behind closed doors? None of the opposition that came up to testify had any idea that Tuesdays and Fridays were to be shut down. None of the opposition knew about the 3% rule during testimony. The Board presented one proposal for us to testify to, and then SNUCK in tons of changes right before the VOTE on a completely changed document! This is an OUTRAGE! This is complete corruption and 100% against the intentions of State Laws. This is something I would expect in a 3rd world country, certainly NOT in America!

How about the trawler bottom sensors? Multimillion dollar operations came up and testified against a \$5,000 sensor and how it would set them back financially. The BOF gave most of them extra time, way past the 3 minutes, by asking them follow-up questions, non-stop. And the BOF fell for their tears, instead of science, and voted in their favor.

REALLY?? Where were the follow-up questions for the drifters in Cook Inlet?

Let me put this into perspective: I bought a boat for half a million dollars for this upcoming season in 2026. I also bought nets, a \$52,000 permit, etc. I am \$600,000 in debt, just to hopefully go and catch some salmon based on a decent run forecast. All this happened BEFORE your vote on 186. And what does the board do? By shutting down Area 1, Tuesdays and Fridays, etc., the board effectively slashes my potential income by \$100,000 to \$150,000! I am no math expert, but that is 2,000 to 3,000% more than \$5,000! The board clearly decided AGAINST causing \$5,000 financial burden on the draggers, who are multimillion dollar operations and could EASILY take that small hit in the name of science, while potentially absolutely possibly DESTROYING us small time drifters!

This is not to say that management should be 100% based on the local economy. We, the commercial fishermen are ALWAYS concerned about sustainable fisheries in EVERY species, not only salmon. But it is CRUCIAL that we stick to science and data.

We cannot punish one user group while clearly allocating the run to other groups. That is wrong. That is illegal. And that is destructive to a small company like mine.

And worst of all: This was all done out of cycle. ZERO factual data. Zero regard for the livelihoods of the invested Alaskans.

If there's less coho coming back, let's find out WHY and not simply throw the burden on the drift fleet, bankrupt companies like my own, all while the rivers are being pillaged, shoulder to shoulder.

We are a limited entry fishery. Not one drift permit has been added to Cook Inlet in DECADES. Our nets are NOT longer. In fact, the dual permit program allows for fewer boats in the Inlet, in turn resulting in less fathoms of net over all.

That said, the population of Alaska has grown EXPONENTIALLY in the same decades. Think of this: there is ZERO limit on how many sports fishing licenses the State can sell. There are ZERO limits on the number of subsistence permits that can be handed out. Think of it: if 600,000 Alaskans decide to one day go and catch 10 fish each, that's 6,000,000 fish. Is that sustainable??

The State Law clearly allows all three user group to EQUAL rights for maximum yield, based off of sustainability. But those numbers alone prove that is not the case. Yes, subsistence does get priority over the others in particular cases, but the sport fishermen, standing shoulder to shoulder in the river, DO NOT and should not get priority over the commercial fleet, and yet the BOF disregarded that clear fact.

I strongly urge the Board of Fish, on behalf of myself, my family and the rest of the fleet, to REPEAL this terrible mistake and allow us the time to collect the necessary and factual data for the 2027 CYCLE.

Thank you for reading this and hopefully doing the right thing in the end!

Most sincerely, Captain SeaBass

F/V Paycheck

Bristol Bay Economic Development Corporation

P.O. Box 1464 • Dillingham, Alaska 99576 • (907) 842-4370 • Fax (907) 842-4336 • 1-800-478-4370



Subject: Comments on Proposal 189 – 5 AAC 96.6XX, Board of Fisheries Policy on Traditional Knowledge

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to review and comment on Proposal 189, which would adopt regulatory language establishing a Board of Fisheries policy on Traditional Knowledge.

We appreciate the Board’s recognition of both traditional knowledge and local knowledge as important components of the “best available science” used to inform fisheries management decisions. The proposed language appropriately acknowledges the long-standing relationships that many knowledge holders—particularly Indigenous communities—have with fishery resources and ecological systems, and the value those perspectives can bring to Board deliberations.

At the same time, we offer the following comments and considerations for the Board’s review:

1. Clarity and Consistency in Definitions

The proposal provides detailed definitions for both “Traditional Knowledge” and “Local Knowledge,” which is helpful. However, the distinction between the two—particularly regarding experience, time scale, and eligibility to contribute—could benefit from further clarification to avoid confusion or unintended exclusion. Ensuring that both knowledge systems are clearly understood as complementary, rather than hierarchical, would strengthen the policy.

2. Integration with Existing Processes

The Board notes that local knowledge has historically been incorporated through advisory committees, public comment, and committee processes. It may be useful to more explicitly describe how Traditional Knowledge will be integrated into these existing frameworks to ensure consistency, transparency, and equitable treatment of all testimony. We strongly recommend the use of the established advisory committee process to incorporate traditional knowledge.

3. Process for Identifying Knowledge Holders

The provision allowing Traditional Knowledge holders to be “recognized and nominated by their community, tribe, or organization” is a thoughtful approach. However, additional clarity regarding how nominations will be verified or administered could help ensure fairness and avoid ambiguity during Board proceedings.

4. Testimony Format and Time Allocation

The allowance for alternative formats (audio/visual) is a positive step toward inclusivity. The ten-minute time limit is consistent with standard testimony; however, the Board may wish to consider whether flexibility is warranted in cases where Traditional Knowledge is conveyed through storytelling or other formats that may not align neatly with standard time constraints.

5. Regulatory vs. Policy Placement

Because this proposal seeks to place what is currently a Board policy into regulation, the Board may wish to consider whether all elements are appropriate for codification. Regulatory language

benefits from clarity, enforceability, and consistency, and some portions of the proposed text—particularly those describing values or worldviews—may be better suited to policy guidance rather than regulation.

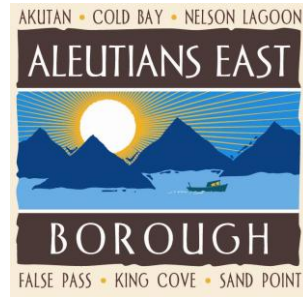
In summary, we support the Board’s effort to formally recognize and incorporate Traditional Knowledge into its decision-making process. With additional refinement to improve clarity, consistency, and implementation, Proposal 189 has the potential to strengthen the Board’s deliberative framework and enhance stakeholder participation.

We strongly encourage the board to allow an additional public review of the draft language that will come out of this meeting, with the intent to vote on it at the work session in October 2026.

Thank you for your consideration of these comments and for your continued work in managing Alaska’s fisheries resources.

Respectfully,

BBEDC



April 30, 2026

Alaska Board of Fisheries

Chair Märit Carlson-Van Dort

Submitted via Comment Portal for BOF Supplemental Proposals 189-192

RE: Aleutians East Borough Formal Concern Regarding the Integrity of the Alaska Board of Fisheries Public Process

The Aleutians East Borough (AEB) encompasses the communities of Akutan, False Pass, Nelson Lagoon, Cold Bay, King Cove, and Sand Point, and includes the state waters fishing areas of the North and South Alaska Peninsula (Area M). The AEB actively and consistently engages in the Board of Fisheries process, given that our local economy and Borough revenues are directly and substantially dependent on the health and stability of State-waters fisheries. Our Natural Resources Staff participates in and provides technical input at all Board meetings relevant to our region and works to inform, support, and advise the Board on matters within Area M to ensure the long-term sustainability and responsible management of fisheries statewide.

The Borough is deeply concerned with the integrity of the current Alaska Board of Fisheries process as it relates to the consideration of Board Generated Proposal (BGP)192 - an allocative proposal that, **according to Alaska Department of Fish and Game (ADF&G) Staff comments, would impose additional financial burdens on participating fishermen.** This proposal was introduced during Miscellaneous Business at the final in-person meeting of the 2025/2026 Board Cycle - outside of the standard proposal development process - and is now scheduled to be taken up via a previously unscheduled, webconference-only meeting, effectively limiting transparency and eliminating meaningful public participation. This approach denies stakeholders, including Advisory Committees and affected fishing communities, any opportunity for oral testimony, direct engagement, or substantive interaction with the Board on an issue of significant economic consequence. We assert that Proposal 192 does not meet the Board's own unanimously adopted criteria for developing and scheduling [a board-generated proposal \(2013-270-FB\)](#).

We further assert that it is not in the public's best interest to utilize the board-generated proposal process to advance a highly allocative action - one that, according to available analysis, would require substantial new investment from affected fishermen - through a webconference-only meeting where public and Advisory Committee oral testimony is not permitted.

If the stated urgency is to allow fishermen the opportunity to utilize alternative gear in the upcoming fishing season, rather than addressing the issue during the regular Board cycle, we do not believe this rationale justifies bypassing the Board's established, transparent, and participatory process.

The **existing** proposal submission framework **is** sufficient to address this issue within the normal course of business, particularly given that the upcoming 2026/2027 Board meeting cycle will include Cook Inlet and Kodiak issues, where this topic could be fully vetted.

While we appreciate the opportunity to provide written comment, we emphasize that a proposal of this magnitude - one that would eliminate a specific gear type from a fishery and replace it with another - warrants a more rigorous, transparent, and inclusive public process.

Accordingly, **the** Aleutians East Borough formally requests that **the** Board remove Proposal 192 from the May 1, 2026, Special Supplemental Proposals meeting agenda and instead introduce it as a board-generated proposal for the regular 2026/2027 cycle, where it can receive the full level of public review, testimony, and deliberation that such a significant regulatory change demands.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alvin D. Osterback', with a long horizontal flourish extending to the right.

Alvin D. Osterback
Mayor
Aleutians East Borough
aosterback@aeboro.org

I support Proposal 189 with amendments as provided below.

The State of Alaska Board of Fish has a long history of disregarding local and traditional knowledge and testimony and I am speaking from my own experiences. For the past seventeen years I've been struggling to protect the resources I grew up with, trying to reverse detrimental Board decisions relating to Resurrection Bay, Bear Lake, our local resources, and the damages done by Cook Inlet Aquaculture Association.

CIAA is not only bankrupt now, they are in debt twenty million dollars—money that Cook Inlet permit holders are obliged to repay without proper notice or representation. (See Attachment/Image #1)

In 2009 CIAA requested, out of cycle—without notice to permit holders—for permission to harvest 100% of the sockeye return to Resurrection Bay and the Board of Fish granted it, with a sunset clause that has been disregarded. Further, CIAA pursued replacing a balanced management plan (The Bear Lake Management Plan) with a plan that weighs heavily for “management by cost recovery,” and common property fishing came to a screeching halt that continues to this day.

Adding to this disregard of what's best for the area and its users, the Regional Planning Team is nothing but CIAA representatives and ADF&G staff who do whatever CIAA proposes. There is no input from locals and no inclusion of traditional knowledge. Local and/or traditional knowledge at this level is clearly not sought, nor desired. The only place my voice is heard is at the Advisory Board level.

I was born in Seward, grew up fishing from the shoreline, started commercial fishing Lower Cook Inlet in 1973, and have been shut out of seining in my own home bay because of CIAA. In fact, in 2016, CIAA attempted to shut down sport fishing in Resurrection Bay in an attempt to increase their cost recovery income (See attached #2: Proposal 203 from 2015-2016 Proposal Book). See also attached #3: Seward Advisory Committee Co-Chair comments on Proposal 203 which outlines the history of CIAA

through 2016 and the comments as noted within of resident Mr. Carl Norman, RC 025, attachment #4).

Resurrection Bay, via ADG&G Emergency Orders, is being managed solely for the benefit of Cook Inlet Aquaculture to this day. See attached #5: 2026 ADF&G Lower Cook Inlet Salmon Fishery Advisory Announcement #1 for the Eastern District of Lower Cook Inlet.

I have spoken before the Board of Fish regularly over the past seventeen years opposing the continuing prioritization of cost-recovery at the continued expense of any common property harvesting. I've submitted proposals to reinstate the Bear Lake Management Plan and so has the Seward Local Advisory Committee. My voice has been ignored completely. I take no joy in writing "I told you so" but this issue has come to a head, and worse, it sets the stage for the same disaster happening throughout the state.

CIAA relied heavily on grants that disappeared in 2008, then applied for millions of dollars in loans they can't possibly repay, while they continued to mismanage and decimate local stocks and salmon runs. Seventeen years and twenty million dollars of debt later, I'm yet again putting proposals to the board, supplying the same local knowledge, begging again for traditional resource management on salmon runs that are now virtually destroyed by over-reaching aquaculture mismanagement.

I have struck out some language in Proposal 189 relating to local knowledge, because it skews toward inclusion to what the Board has already relied on far too heavily: unsound proposals made by short-experienced organizations or individuals—people purporting to be experts who ignore the entire history of an area and the needs of the locals—for projects that have no basis in historic success and are meant to exploit, overuse, or inflate our resources instead of focusing on returning them to their historic, ecologically balanced condition.

I submit my endorsement for Proposal 189 with the following changes, along with my inclusions and attachments as listed above:

PROPOSAL 189

5 AAC 96.6XX. New Section.

Adopt a Policy on Traditional Knowledge into regulation, as follows:

This regulatory language is in addition to 2024-305-FB: Alaska Board of Fisheries Policy on Traditional Knowledge

Chapter 96 is amended by adding a new section to read:

5 AAC 96.6XX. Board of Fisheries policy on traditional knowledge. (a) The Alaska Board of Fisheries recognizes local knowledge and traditional knowledge as **a critical** [AN IMPORTANT] aspect of best available science. As such, [ACCESS TO] these knowledge systems should **be included in all** [AN IMPORTANT PART OF INFORMING] Board decisions **due to their** [THROUGH THEIR] close proximity and intimate, often long-standing, relationships with fish resources, the environment, and the ecological systems that are critical to fishery sustainability. These relationships may exceed direct references to the natural world to include values associated with an entire world view, such as reciprocity, respect, and relationality.

The Board endeavors to incorporate traditional knowledge by seeking and inviting traditional knowledge holders recognized and nominated by their community, tribe, or by an organization whose interests encompass the conservation, protection, restoration, or enhancement of fishery resources, to share their experiences, values, alternative and/or independent observations and data collections directly with the Board, **it's Advisory Committees, Regional Planning Teams, and other sources and groups focused on resource management.**

(b) For the purpose of this section, "Traditional Knowledge" means knowledge, or a way of knowing, that is unique to a given culture or society, and, often through language, encompasses a worldview that defines specific relationships between humans and nonhuman attributes of the world. As knowledge that derives from both personal and the cumulative experiences of one's forbearers, it is grounded in generational knowledge but also subject to change and refinement. Traditional Knowledge is characterized by a long time scale, is usually local in scale, and often provides a counterpoint to more broad-based, scientifically produced knowledge. This sharing of information may not be limited to in-person testimony but may include consideration of alternative forms of audio or visual media at the discretion of the chair. The Board will provide the opportunity to sign-up prior to Board meetings to provide traditional knowledge relevant to the proposals and subject matter under consideration at that meeting. The time allowance is ten minutes. The Board defines Traditional Knowledge differently than Local Knowledge. [THE BOARD'S DECISION-MAKING HAS LONG INCORPORATED LOCAL KNOWLEDGE HOLDERS AND EXPERTS PRIMARILY THROUGH THE DEPARTMENT'S LOCAL ADVISORY COMMITTEES, ORAL AND WRITTEN PUBLIC COMMENTS, AND THE BOARD'S COMMITTEE PROCESSES.]

(c) For the purpose of this section, "Local Knowledge" means knowledge, or a way of knowing, developed from the observations and experiences of people living, working, harvesting, and

processing fish or game in specific places, and local knowledge holders may or may not be Indigenous Peoples. Local Knowledge can evolve over time, but it is inherently the product of knowledge based on personal or shared experience. Local knowledge holders can be local people residing in communities with area and community specific insights to share. [ONE IMPORTANT DISTINCTION OF LOCAL KNOWLEDGE FROM TRADITIONAL KNOWLEDGE IS THAT ONE DOES NOT NECESSARILY NEED YEARS OF EXPERIENCE TO HOLD LOCAL KNOWLEDGE ABOUT AN ECOSYSTEM, FISHERY, OR SPECIES OF FISH. THE TERM 'LOCAL KNOWLEDGE HOLDER' IS USED IN REFERENCE TO ANY, AND ALL, PEOPLE THAT HOLD INFORMATION RELEVANT TO A PARTICULAR FISHERY FOR EXAMPLE, RESIDENTS, FISHERMEN,, WHILE A 'LOCAL KNOWLEDGE EXPERT' IS MORE SPECIFIC AND ACKNOWLEDGES THAT AN INDIVIDUAL MAY HOLD ABOVE-AVERAGE KNOWLEDGE ABOUT A TOPIC THAT IS DEEP IN BREADTH AND SCOPE. A 'LOCAL KNOWLEDGE EXPERT' MAY ALSO BE RECOGNIZED BY THEIR PEERS AS SUCH.]

Attachment #1 CIAA 2026 Financial Status:

Long Term Liabilities	
2400 · SOA Capital & Operating Loans	
2405 · Loan 55-250-0802865 Operating	23,412.01
2406 · Loan 55-250-0802865 Def Int	811.57
2407 · Loan 55-250-0802920 Operating	34,221.11
2408 · Loan 55-250-0802920 Def Int	1,193.08
2409 · Loan 55-250-0802953 Capital	69,375.90
2410 · Loan 55-250-0802953 Def Int	2,469.22
2411 · Loan 55-250-0803013 Operating	422,265.26
2412 · Loan 55-250-0803013 Def Int	11,214.68
2413 · Loan 55-250-0803382 Operating	518,230.23
2415 · Loan 55-250-0803569 Operating	967,768.54
2417 · Loan 55-250-0803657 Operating	1,382,455.73
2419 · Loan 55-250-0803701 Capital	2,685,327.14
2421 · Loan 55-250-0803646 Capital	571,994.84
2423 · Loan 55-250-0803789 Operating	1,149,679.63
2425 · Loan 55-250-0803833 Capital	849,119.60
2427 · Loan 55-250-0803932 Operating	2,420,850.61
2429 · Loan 55-250-0803910 Capital	156,476.26
2431 · Loan 55-250-0803976 Operating	3,020,187.64
2433 · Loan 55-250-0803965 Capital	276,759.67
2435 · Loan 55-250-0804130 Capital	900,000.00
2437 · Loan 55-250-0804141 Operating	2,100,000.00
2438 · Loan 55-250-0804174 Operating	1,782,000.00
Total 2400 · SOA Capital & Operating Loans	19,345,812.72
Total Long Term Liabilities	19,345,812.72
Total Liabilities	19,645,760.28
Equity	
3900 · Retained Earnings	-10,616,202.36
Net Income	574,878.21
Total Equity	-10,041,324.15
TOTAL LIABILITIES & EQUITY	9,604,436.13

Attachment 2: Proposal 203 from 2016:

PROPOSAL 203 – 5 AAC 75.003. Emergency order authority. Expand emergency authority to close sport fishing in special harvest areas if hatchery cost recovery goals may not be met, as follows:

5 AAC 75.003 is amended to read:

(5) The commissioner or an authorized designee may close a hatchery special harvest area, or a portion of a hatchery special harvest area, to sport fishing for hatchery produced fish by emergency order when

(A) the special harvest area is closed to commercial common property fishery harvest of hatchery-produced fish; and

(B) the total escapement of hatchery-produced fish through existing fisheries into the special harvest area is projected to be less than the hatchery escapement goal for that species, which includes broodstock, cost recovery, and any natural spawning requirements as listed in hatchery annual management plans that have been approved by the department; the intent of this subparagraph is to assure hatchery broodstock, cost-recovery, and natural spawning requirements are met.

What is the issue you would like the board to address and why? There are nonprofit hatchery programs throughout Alaska providing harvest opportunities for sport and commercial fisheries. To support these programs, hatcheries must have access to: 1) broodstock to supply gametes (eggs and sperm) to perpetuate hatchery releases; and 2) the financial resources generated from cost recovery harvests to operate the hatchery facilities and associated programs. On occasion, a hatchery return after passing through common property fisheries into a hatchery special harvest area is insufficient to meet hatchery escapement goals (broodstock and cost recovery harvest) and also support sport and commercial harvests within the hatchery special harvest area. This proposal provides authority for Alaska Department of Fish and Game to close by emergency order a special harvest area or a portion of a special harvest area to sport fishing when commercial harvest within that special harvest area has been closed to achieve hatchery escapement goals. The proposal also recognizes natural spawning requirements. By ensuring natural spawning, hatchery broodstock, and cost recovery requirements are met, future harvest opportunities are maintained for all users.

PROPOSED BY: Cook Inlet Aquaculture Association, Douglas Island Pink and Chum, Inc., Kodiak Regional Aquaculture Association, Prince William Sound Aquaculture Corporation, Northern Southeast Regional Aquaculture Association, and Southern Southeast Regional Aquaculture Association (EF-C15-067)

Attachment #3: Seward AC Comments: 2016 STATEWIDE BOARD OF FISHERIES PRESENTATION 3/8/16 RC 047

Good afternoon Mr. Chairman, members of the Board and Staff. My name is Dianne Dubuc. I appreciate the opportunity to address you today and do so on behalf of the Seward Fish and Game Advisory Committee of which I am vice chair.

The Seward Fish and Game Advisory Committee petitioned the Joint Boards in 2013 to reduce the size of our AC from 15 members and 2 alternates to 10 members and 2 alternates because we were having problems achieving a quorum at some meetings. Our Committee of 12 is made up of 5 citizen sportsmen, 4 commercial fishermen, and 3 charter sports fishermen. We also seek to keep all seats as undesignated. The Seward AC met on Thursday, October 15 and Friday Feb 5 with a quorum of 9 members to discuss Statewide Finfish proposals, Board of Game proposals and to hold elections.

For a full review, and the actions we took on various proposals please refer to our minutes which is RC8 in your book. Please also refer to RC # 25 which is Mr. Norman's testimony in full which were supposed to be attached to the minutes.

In the interest of the available allotted time for testimony I will focus my discussion today on Proposal 203 submitted by CIAA.

Proposal 203 seeks to Expand emergency order authority to close sport fishing in special harvest areas if hatchery cost recovery goals may not be met.

Our AC unanimously opposed this proposal 8-0.

To begin with, we felt this issue should not be a Statewide meeting. Each hatchery is different and they should be managed on a case by case basis. To our knowledge, CIAA is the only hatchery that collects brood stock at an area far away from where cost recovery is done. Cost recovery happens in the SHA within the Bay. Brood is collected in the freshwater SHA at the weir at Bear Lake. The terminus of the Bear Lake SHA. Please refer to RC#16 for detailed maps of the Bear Lake, Homer. And Port Graham SHAs. Please note that the Homer and Port Graham SHAs are concentrated in smaller areas than the Bear Lake SHA. For the benefit of recently appointed Board members and as a refresher for older members please allow me to present some historical perspective on this matter.

In November of 2004 at the LCI meeting two proposals of note were passed. Proposal 15 put forth by CIAA sought to among other things establish the Bear Lake SHA and called for a review of the SHA as well as the management plan in 3 years. Again RC # 16. This proposal was carried as amended. The amendment read " The Dept. shall manage the commercial harvest of enhanced Bear Lake sockeye for a 50/50 split between the commercial seine fleet and the Trail Lakes Hatchery operators"

Proposal 28 submitted by the Seward A C was carried allowing a freshwater salmon fishery for coho from the estuary to the bridges on the Seward Highway as up until that time there were no fresh water salmon sports fishing opportunities in our area.

At the 2007 LCI meeting the Seward AC submitted Proposal 21 which would open the same area designated in 2004 for red fishing. The Board carried this proposal.

In 2009 CIAA submitted Proposal #380 as a petition out of cycle and the Board scheduled it for regulatory consideration during the March 2009 Statewide Shellfish meeting. Proposal 380 would repeal the Bear Lake Management Plan and replace it with the Trail Lakes Management Plan. The hatchery was in a financial bind and needed 100% of the resource in all the SHAs for cost recovery to stay afloat. The Plan would have the Department manage the SHAs to achieve CIAA cost recovery and broodstock goals for the Trail Lake Hatchery.

The Seward A C was initially against this proposal as this was the first time we had heard of a fishery being managed for brood stock AND cost recovery. We amended 380 as follows: There would be alternate days fishing including all of the shas for common property and CIAA. This arrangement would last for one year. The Board carried proposal 380 and replaced the 50 50 split of the Bear Lake Management plan with the Trail Lake Management Plan giving 100% of the fish to CIAA.

Prop 380 was amended with a sunset clause that would expire in 2011. The management for both cost recovery and brood stock would be for years 09 and 2010 only. Paragraph D part 3 of prop 380 stated the prime objective of any sockeye salmon enhancement must be to provide the opportunity for a commercial sockeye fishery prosecuted with MINIMAL CONFLICT WITH THE RECREATIONAL FISHERY.

In 2010 CIAA submitted 3 proposals at the LCI. Proposal 12 would remove the sunset clause from the Trail Lake Management Plan. Proposal 13 would close the sports fishery when brood stock goals were not met. Proposal 14 would close the PU fishery until all brood stock goals were met. All 3 proposals failed.

At the 2013 LCI meeting CIAA submitted proposals 83, 84, and 85. Each of these proposals dealing with 3 different areas asked the Board to manage these areas to achieve brood stock and harvest, cost recovery, goals. The Board adopted the amended language in RC 2 6 which read: The Dept. will manage the sports fishery in accordance with regulations in 5 AAC 47-5ACC 75. The commissioner may issue eo's to liberalize or restrict sports fisheries based on achievement of brood stock goals. All 3 proposals passed with the amended language. Of note is that the Board did not allow management for cost recovery purposes. Fast forward to today and proposal 203.

CIAA is again asking the Board to manage fishing in the SHAs according to brood stock and cost recovery goals. CIA has had limited success at best achieving cost recovery goals. In

2014 the goal was 2.9 million and the actual \$ amount caught was 1,725,643\$. In 2015 the goal was 4.2 million and 2,571,603 were realized. With the price of fish going down and the cost recovery goals going up we do not see how cost recovery goals will ever be realized. Seward would be directly affected by allowing management for CR in the Bear Lake SHA as the SHA takes up a good portion of Resurrection Bay. Early run reds are money fish for CIAA competing only with Copper River Reds. As of now management has been only for brood and NOT for cost recovery. RC 26 at the 2013 meeting put this in stature that the sports fishery would be managed for brood and not CR.

There is also the issue of wild fish being caught in CR efforts. At a recent CIA board meeting it was stated that in 2015 90,000 reds were caught for cost recovery. 1 % or 900 of these fish were wild. Taking that into consideration, a percentage of wild fish must also be taken by the sports fishery. Not all of the fish swimming thru the SHA are hatchery fish. As an aside, CIA was giving away reds at the Bear Lake weir this year. Not charging for the fish but giving them away. How is it possible to be giving away fish when cost recovery goals are not being met? Obviously the sports component of the catch was insignificant as enough fish made it passed them to be given away. Again please refer to RC # 16 for sport caught catch data. Perhaps the cost recovery efforts should be doing a better job of catching these fish. We ask the Board to allow the status quo to remain and allow the Dept. to manage for brood stock only and not cost recovery.

In closing I would like to reference Brent Johnson's, statement in the 2014 annual report "Part of the CIAA mission is to Maximize the value of Cook Inlet's common property salmon resource" What better way to do that than have the fisheries open to anyone who wants to participate. Not so in the Bear Lake SHA. The common property fishery has been virtually nonexistent as all the fish have been going to support the Hatchery since 2009.

Thank you for your time and consideration today. I will attempt to answer any questions you may have. I also have copies of the various proposals I referenced if anyone is interested.

Attachment #4. RC 025, Comments of Mr. Carl Norman, longtime resident of Seward, regarding Proposal 203 in 2016:

RC 025

On the issue of closing sport fishing for red salmon in Resurrection Bay.

The entire issue seems to revolve around money. Money for Cook Inlet Aquaculture Association:

Nothing else. Too bad for the people that have harvested the reds in Resurrection Bay for generations.

In the 1960s, the ADF&G poisoned Bear Lake and killed every fish in it. At the time, I, along with several others were on site protesting this. The Troopers were called and told us we would be arrested if we didn't immediately leave and let ADF&G continue their "fish genocide". This was supposedly done to rid the lake of "stickleback" parasitic, very small fish. It turned out to be aimed at killing the red salmon run in Bear Lake in order to make more habitat for spawning, "sporty" silver salmon. The weir was installed on Bear Creek for the purpose of exterminating the natural red salmon run into Bear Lake and enhancing the silver salmon there because the red salmon wouldn't bite for "sports fishermen" and the silvers would out in the bay, thus generating more income in the Seward area via sportsmen coming to Seward to fish for silvers. Before the reds could be completely exterminated, a new study was conducted on the silvers and, lo and behold, the majority of silvers go up the Resurrection River drainage to spawn. By that time, Cook Inlet Aquaculture had the hatchery just north of Moose Pass in operation. They recognized that the red salmon spawn could be hatched in their hatchery and sold, state wide, for enough profit to further their "non-profit" operation. They then started enhancing the run of red salmon into Bear Lake, though at a limited number, but enough for their purposes of selling the red salmon smolt state wide. CIAA then claimed exclusive ownership of all red and silver salmon running up Bear Creek and into Bear Lake to spawn and thUs giving them a continuous supply of salmon roe/eggs for their hatchery operation to thrive. ADF&G supported them and still does. The weir completely blocks Bear Creek and CIAA only allows a limited number of reds and silvers into the lake. After those numbers are reached, CIAA closes off Bear Creek and traps the remaining salmon in the creek below the weir and for a couple miles downstream from the weir. This, in effect, creates an artificial bait station that attracts an inordinate number of brown bears into the area, causing a very dangerous situation for Bear Creek area residents living in the area. This "bear baiting" is highly illegal for any citizen to do except for a highly regulated process for black bears only. Now, a couple of years ago, CIAA decided to take the red salmon in a completely different direction. They now take the red salmon eggs from Bear Lake, hatch them in their hatchery and release them in manmade lagoons near the mouth of Fourth of July creek for "imprinting". I have heard they intend to eliminate, once again, the red salmon run in Bear Lake? True or not, it seems they are intent on doing it.

The entire process of eliminating the red salmon resource from any harvest of local residents is extremely radical. It's wrong. All to maintain enough profit for CIAA to make more money. I firmly believe that the weir on Bear Creek should be removed and the entire creek/lake system returned to mother nature, who did a fine job for thousands of years. The CIAA can obtain their salmon eggs to sustain their "cost recovery", or profit, from Cook Inlet, the same way they obtain king salmon smolt to create the artificial run of kings in Resurrection Bay.

Let mother nature manage the salmon resource in Resurrection Bay. It belongs to the people, not CIAA. Plain and simple. If the new scheme to eliminate the people in order to enhance CIAA money, It's WRONG!!!

Carl Norman

Attachment #5: 2026 ADF&G Announcement showing management of Eastern District solely for the financial benefit of Cook Inlet Aquaculture Association

Division of Commercial Fisheries
Forrest Bowers, Acting Director

Homer Area Office
3298 Douglas Place
Homer, AK 99603-7942



Alaska Department of Fish and Game
Doug Vincent-Lang, Commissioner

PO Box 115526
Juneau, AK 99811-5526
www.adfg.alaska.gov

Advisory Announcement

For Immediate Release: Friday, April 24, 2026

Time: 2:00 PM

CONTACT: Glenn Hollowell

Finfish Management Biologist
(907) 235-8191

Lower Cook Inlet Salmon Fishery Advisory Announcement #1

SOUTHERN DISTRICT: Set gillnet: Effective Monday, June 1 specific waters of the Southern District identified in 5AAC 21.330(b)(1) including the Port Graham Subdistrict, will open to commercial set gillnet harvest on a regular schedule of two 48-hour fishing periods per week beginning at 6:00 AM on Mondays and Thursdays as defined in 5AAC 21.320(a)(3).

Commercial set gillnet fishermen in Lower Cook Inlet that have dual, (aka “stacked”) Area H Commercial Fisheries Entry Commission (CFEC) permits are reminded that the serial numbers for both permits are required to be documented on each fish ticket submitted regardless of the quantity of gear used. An example of this is shown in Figure 1 on page two of this announcement.

Purse seine: Portions of the Southern District are anticipated to open to commercial seine harvest on Monday, June 8.

EASTERN DISTRICT: Cook Inlet Aquaculture Association (CIAA) projects 84,000 hatchery released sockeye salmon will return to Resurrection Bay in 2026. Sixty-five thousand of these fish will be targeted for cost recovery harvest and 12,000 are needed for escapement and broodstock. Approximately 7,000 fish are anticipated to be surplus to these needs and may be available for common property harvest. Cost recovery operations will be voluntarily suspended within 100 feet of the water’s edge in the Spring Creek area from the Seward Ships Drydock, north to the area of the sawdust pile from 6:00 AM to 10:00 PM, 7 days per week. The department anticipates fishing opportunity to occur in the Aialik Subdistrict by early July.

KAMISHAK DISTRICT: Portions of the Kamishak District are anticipated to open to commercial harvest in July based on aerial survey documentation of pink and chum salmon in index streams in those areas. The Chenik Subdistrict is anticipated to open to commercial harvest in late June or early July targeting returns to Chenik Lake.

OUTER DISTRICT: Western portions of the Outer District may open in mid July based on aerial survey observations. The Delight Lake weir will not be operated in 2026 due to budgetary shortfalls. Escapement to Delight Lake will be monitored using aerial surveys. The 2026 anticipated Outer District pink salmon harvest is 134,500 fish. Commercial pink salmon harvest from this district in 2024 was 7,091, in 2022 was 324,836 fish, and in 2020 was 1.6 million fish.

Name: Robert Wolfe

Community of Residence: Girdwood

Proposal 192: Replace set net with "newly established" beach seine gear.

Newly established is a stretch. It has been done on an experimental basis with limited fishing time, in fair weather and catches under 500 fish. No research on its application and equity for all SO4H permit Holders. Being a fisherman I would suggest doing test sets when the fish are heavy. What is the capacity of the haul? What are conditions inside the seine when it has 2,000?, 3,000?, 5,000? sockeye in 1-2 ft of water/mud. How effective is releasing Kings in those conditions? Add a little surf on top and you got a great video. These seines will be used for production in harsh conditions inevitably there will be a limit. What is that limit?

Don't try to reinvent the wheel. This is not an established fishery. This would be an exclusive fishery for a select few.

For decades the Alaska Department of Fish and Game promoted a Trophy King Fishery on the Kenai River. Sport fishers piled high and deep to catch a Trophy King. Combat fishing on a finite resource. Better yet, select out the gene pool of the largest that didn't get run over on the spawning beds by thousands of hydrocarbon belching outboards, what could go wrong?

During this time period there was no criteria for a 75cm King salmon based escapement count. The goal post was changed to accommodate for a component (larger) of King Salmon not the entire relevant population of the past counts. Board generate up yourselves an amendment to Proposal 192 that counts Kings under 75cm again. Keep the fishing times as directed in 192 and let the set netters fish this more limited time schedule. Nets in when the run is in. It's that simple, put your seines away. Quit trying to invent a new fishery.

Who did the BOF coordinate with to develop this Proposal? Local Fish and Game advisory committee? Entire effected Set net community? The answer left blank.

What is the issue the BOF should address and why? The answer only states, " This is a Board generated Proposal."

Replacing set gill net opportunity in the Kenai-late run King Salmon stock of concern plan with Beach seine gear is a commendable attempt by the BOF to provide fishing opportunity to a devastated community of fishers. This half baked Proposal falls to little to late! I say half baked due to the MINIMUM PUBLIC PROCESS involved and incomplete test fishing. What is the capacity of the Seine net? What are conditions when hauled up full? Who can participate, will it be an exclusive fishery?

Last seasons massive over escapement is UNACCEPTABLE. Do the right thing.

Bob Wolfe

Cook Inlet Commercial Salmon Fisher 46 years



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

Date: April 30, 2026

Re: Comments and Opposition to Proposals 190 and 191 – Yukon River Salmon Stock of Concern Management Plans

Dear Chair Carlson-Van Dort and Board Members,

On behalf of the Native Village of Scammon Bay, we submit the following comments regarding Proposals 190 and 191. As a coastal Yup'ik community near the mouth of the Yukon River, our people have relied on salmon for generations. Salmon are not only a primary source of food, but are deeply tied to our culture, traditions, and identity as Yup'ik people.

Our community depends on subsistence fishing for our nutritional needs, food security, and local economy. Management decisions affecting Yukon River salmon runs have immediate and lasting impacts on our families and our ability to maintain our way of life.

Proposals 190 and 191 seek to establish Stock of Concern Management Plans for Yukon River Chinook (king) salmon and fall chum salmon. While we recognize the importance of conservation and sustainability, we strongly oppose moving forward with these proposals at this time.

Our concerns are as follows:

- **Insufficient Data for Decision-Making:**

Advancing changes in stock status without updated, comprehensive data creates a risk of decisions based on incomplete information. This could result in unnecessary restrictions that further burden subsistence users who are already facing ongoing challenges.

- **Limited Time for Public Review and Tribal Consultation:**

The current process does not provide adequate time for meaningful input from our Tribal Council or community members. Decisions of this scale require a more deliberate and inclusive approach that allows for full participation.

- **Impacts to Subsistence and Community Well-Being:**

Subsistence fishing in Scammon Bay is essential—not optional. Additional restrictions could severely impact food security, increase reliance on expensive store-bought foods, and disrupt our cultural practices tied to salmon harvest and sharing.

- **Need for Inclusion of Coastal Tribal Perspectives:**

It is critical that the perspectives of coastal communities like Scammon Bay are fully

considered. Our environmental conditions, access, and harvest patterns differ from upriver communities, and management decisions must reflect these differences.

PC124

Given these concerns, the Native Village of Scammon Bay respectfully requests that the Board maintain the current stock status and defer action on Proposals 190 and 191 until the next regulatory cycle. This will allow time for more complete data collection, meaningful tribal consultation, and a more transparent and inclusive process.

We also emphasize the importance of respecting tribal sovereignty and ensuring that subsistence users are fully represented in decisions that directly affect our resources and way of life.

Thank you for your time, your service, and your consideration of our concerns.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Akerelrea', with a stylized flourish at the end.

Jason Akerelrea, Tribal Council President
Native Village of Scammon Bay

Name: Theresa Clark
Yukon River Inter-Tribal Watershed Council

Community of Residence: Anchorage, AK

Support for proposal 189, 190,191 192

The State of Alaska must protect its renewable natural resources. Salmon (most concern for chinook and chum) is a renewable resource, consumed by Alaskans as a major food source. Salmon numbers (chinook and chum) have been in decline for decades. These resources must be protected. Time is of the essence as the numbers continue to decline. Should the State of Alaska and Board of Fish not take measures to protect these resources, the possibility of extinction increases. Dwindling numbers have and will continue to affect many Alaska residents' food resources and will continue to impact food security.

Name: Sarah Hudkins

Community of Residence: Kenai

I am writing to express my support for the intent behind Proposal 192, particularly the use of set beach seining during periods when the fishery is managed under the Stock of Concern (SOC) plan.

Set beach seining offers meaningful value as a conservation-focused, live-release method. It provides an opportunity to reduce impacts on king salmon while still allowing for some harvest of abundant sockeye. For that reason, it should be considered as an additional management tool during times of restriction.

My family has fished on Salamatof Beach in Cook Inlet for more than 100 years. Like many in this fishery, I was raised on this beach and now continue that legacy alongside my children and grandchildren, representing five generations. This way of life is deeply rooted, not only in tradition, but in the economic stability of our communities and families.

In recent years, fishing opportunity has been reduced to a fraction of what it once was, and with it, the ability for families to sustain themselves. At the same time, large surpluses of sockeye have gone unharvested in the Kenai and Kasilof Rivers, fish that could have supported both fishermen and the broader local economy.

At the Board's direction, fishermen partnered with the Department to test beach seining. That effort, conducted under full observation, produced encouraging results: strong sockeye harvest numbers paired with minimal king salmon interception. These findings clearly show that beach seining can serve as an effective additional tool.

While I did not hold a Commissioner's Permit, Lisa and Brian Gabriel tested their seine on our beach and it proved to be an effective harvesting tool, even though it did not look exactly how it did on the lower beaches. However, it was never designed to replace traditional set netting.

A thoughtful, balanced approach is needed, one that incorporates multiple gear types and provides the Department with the flexibility to respond to varying run strengths. Beach seines, dip nets, and set gillnets can work together to meet conservation goals while maintaining meaningful fishing opportunity.

We understand that a beach seine fishery will not offer equal participation for all fishermen, but this is not a new concept within the East Side Set Net fishery. Location has always influenced opportunity. What has remained consistent is our willingness to adapt. Fishermen have operated under every adjustment the Board has implemented, utilizing alternative gear, fishing with shorter and fewer nets, participating in the 600-foot fishery, and working within significantly reduced fishing time. Many have also taken part in the commercial dip net fishery and participated directly in beach seine testing on their own sites. Even so, the financial strain is real, and many fishing families continue to face significant hardship after years of limited access.

Beach seining on its own will not rebuild this fishery. But as part of a broader, flexible management strategy, it can provide a critical lifeline, while ensuring that set netting remains a viable option when conditions allow.

I respectfully urge the Board to consider a path forward that balances conservation with opportunity, protecting king salmon, responsibly harvesting surplus sockeye, and sustaining the heritage and future of our fishing communities.

Thank you for your time and consideration.

Sincerely,

Sarah Hudkins

Name: Penelope Haas
Stickleback Fish Company

Community of Residence: Homer

Dear Members of the Board of Fish:

The record makes plain that this Board did not pass Proposal 186/RC 161 to protect Coho stocks in the Northern District, but instead to increase the share of Coho harvested by sport fisherman in the Mat-Su Valley. Any proposal meant to protect Coho on an emergency basis -- which is what 186 said it intended to do -- would have restricted the significant sport harvest in proportion to restrictions placed on the drift fishery; it would have required the collection of sport harvest data; and it would have taken real steps to improving and expanding coho enumeration projects, which have failed 7 out of the past 10 years. A proposal meant to deal with an unforeseen emergency in Northern District Coho stocks -- which is what 186 said it intended to do -- would not have made any permanent changes to the drift fishery management plan, let alone permanently close 70 percent of our fishing grounds and permanently close us twice a week, independent of any escapement or harvest numbers.

By passing 186/RC 161, this Board has disgraced itself and has made a worse name for the entire Alaska Department of Fish and Game. You should be ashamed of yourselves for using "conservation" -- which all of us care deeply about ---to get more fish for one user group over another. Your ruse shows your true colors: you don't care about conservation, you are just greedy and happy to crush us so that others may make more money. Shame.

The Cook Inlet drift fleet is made up of local small-business owners who are just trying to make a living of a wild, common-property natural resource. Nearly the entire fleet lives on the Kenai Peninsula, our fish are processed here, our money goes back into the community, we create jobs and support our local maritime economy and culture. Treat us with the respect due us by the Alaska Constitution Article 8, Sections 15, 16 and 17.

Sincerely,

Penelope Haas
Stickleback Fish Company
Homer, AK.

Alaska Constitution Article 8 § 15. No Exclusive Right of Fishery

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the State.

Alaska Constitution Article 8 § 16. Protection of Rights

No person shall be involuntarily divested of his right to the use of waters, his interests in lands, or improvements affecting either, except for a superior beneficial use or public purpose and then only with just compensation and by operation of law.

Alaska Constitution Article 8 § 17. Uniform Application

Laws and regulations governing the use or disposal of natural resources shall apply equally to all persons similarly situated with reference to the subject matter and purpose to be served by the law or regulation.

MEMORANDUM

TO: Alaska Board of Fisheries

FROM: Marilyn Stanislaus-Ayunerak and Stanley Pete, Chair and Secretary of the Coastal Lower Yukon AC

DATE: April 29, 2026

SUBJECT: Opposition to Proposals 190 & 191- Change in stock status for Yukon Chinook Salmon and Yukon Fall Chum

Dear Members of the Alaska Board of Fisheries,

We formally express strong opposition to the proposed changes in stock status for Yukon Chinook Salmon and Yukon Fall Chum. As the Chair and Secretary of the Coastal Lower Yukon AC, we have not had sufficient time to call a meeting and discuss these proposals.

This significant regulatory modification is being considered within a timeframe that does not permit a comprehensive understanding of its potential ramifications for the subsistence fishing communities of the coastal lower Yukon region.

Our primary concerns are as follows:

Insufficient Data for Informed Decision-Making: Rushing a stock status change without updated, data-rich assessments risks decisions based on inadequate or imprecise information. Proceeding without rigorous review could inadvertently lead to hardship for subsistence operations and associated economic activities.

Limited Time for Public Impact Assessment: The compressed timeline has restricted stakeholders' ability to thoroughly analyze the impact of this proposed change on the well-being of subsistence communities. Meaningful public participation is critical, as regulations of this nature are rarely reversed once enacted.

Risk of Economic Instability: For many residents of the coastal lower Yukon, subsistence activities are a primary means of livelihood. A premature change in stock status could impose unforeseen financial burdens on subsistence-dependent families.

We respectfully request that the Board maintain the current status quo until the next regulatory cycle for Yukon proposals. This will allow for a transparent review process, ensuring all parties have the opportunity to engage in due process, which includes proposal acceptance, public hearings, and thorough data review. Adherence to established legal principles is vital to ensure equal protection and to improve representation for subsistence users in regulatory matters.

Thank you for your time and consideration of these critical concerns.

Sincerely, Marilyn Stanislaus Stanley Pete Coastal Lower Yukon A.C. Chairwoman Coastal
Lower Yukon AC Secretary

Proposal Decision Summary

Proposal 190

Oppose

Proposal 191

Oppose

Name: David Martin

Community of Residence: Clam Gulch, Alaska

Madam Chair, Board members,

I strongly oppose Proposal 192 to replace set gill nets with beach seines.

This is illegal because it is not within the authority of the BOF to change gear among others illegal issues. Limited Entry was passed as a Constitutional amendment for set gill nets. If the BOF passes Proposal 192, besides being illegal, it will prevent the bulk of the ESSN fishermen from every being able to fish because there are few areas where seines would be able to be used because of rocks, tides, trash etc. It would also be illegal to regulate set net fishermen differently within the set net fishery. Meaning the set net fishermen who do not have a shore lease and fish offshore would not be allowed to participate. The king issue will never be resolved and the ESSN fishermen will never fish if the BOF continues to ignore reliable science and implement allocative inflated king salmon escapement goals, that are not be achievable when only counting less than 40% of the king run.

Name: Troy Hollier

Community of Residence: Kenai Peninsula

My name is Troy Hollier. I strongly oppose proposal 192. I am a fourth generation Set Netter on the East Side in Cook Inlet. This proposal is unjust, essentially wiping out an industry that has provided for families, mainly Alaska residents, for decades. Replacing Set Nets with Seines will only 88% of Set Netters will be able to participate in the harvest of Sockeye Salmon returning to the Kenai River. Seines should ONLY be used as an ALTERNATIVE gear type on years of low King return, when the in river goal cannot be met.

Thank you,

Troy Hollier

Name: Kirian Kuzmin

Community of Residence: Homer

To the BOF and all concerned parties,

Please refer to Chelsa Johnson's petition for a more detailed explanation of my objections to Proposal 186.

There is overwhelming support among drift fleet operators for the repeal of the Board of Fisheries' decision on Proposal 186. Hundreds of operators stand behind this petition.

On a personal level, after attending the full three-day meeting in person, I was repeatedly struck by what appeared to be clear bias among board members against the commercial salmon fleet. This perception was not isolated—it was consistent throughout the proceedings.

Following a record-setting 2025 season, the allocative decision made under Proposal 186 was not only, in my view, unlawful, but also disproportionately harmful to a specific user group. The outcome effectively reallocates fish away from the commercial fleet in favor of recreational and subsistence users. State law does not permit management decisions that intentionally disadvantage one user group in this manner.

If commercial drifters are restricted due to concerns over specific species, then consistency under the law would require similar restrictions across all user groups. That standard is not being applied. Instead, commercial operators face severe reductions, while other fisheries continue largely unaffected.

Further, it is deeply concerning that a sitting board member has publicly expressed a desire to see the commercial fleet eliminated entirely. Such statements call into question the impartiality required for fair governance.

There are also serious ethical considerations. If a set netter is restricted from voting due to conflict of interest, then similar scrutiny should be applied to board members who participate in sport or subsistence fisheries.

Equal standards must apply to ensure neutrality and credibility.

Critically, where is the data directly linking the commercial drift fleet to reduced coho returns in specific river systems? Decisions of this magnitude should be grounded in clear, defensible scientific evidence.

Equally troubling is the decision to push this proposal through out of cycle rather than waiting until the 2027 cycle, when sufficient data could be gathered to support a sound, science-based decision.

The process itself raises concerns. Significant changes—such as the closure of Area 1, additional weekly shutdown days, and the shift from a 1% to 3% rule—were introduced late, without adequate public awareness or opportunity for testimony. Stakeholders testified on one version of the proposal, only for materially different terms to be adopted prior to the final vote. This undermines transparency and public trust.

From a practical standpoint, the financial consequences are severe. I have personally invested \$30,000–\$40,000 into my operation, including vessel, gear, crew, and infrastructure, based on historical access and expectations. The changes enacted under Proposal 186 could reduce my annual income by \$75,000 to \$125,000—an unsustainable loss for a small operator.

In contrast, the Board chose to avoid imposing relatively minor financial impacts on significantly larger operations, while placing disproportionate burdens on small, independent fishermen.

This is not an argument against conservation. Commercial fishermen depend on sustainable fisheries and support science-based management. However, sustainability must be pursued through accurate data, fair allocation, and consistent application of the law.

The commercial drift fleet operates under a limited entry system. No new permits have been added in decades, and programs such as dual permits have reduced overall fishing pressure. Meanwhile, participation in sport and subsistence fisheries has grown significantly, with no comparable limits on entry.

This imbalance raises legitimate questions about long-term sustainability and equitable access. While subsistence has priority under certain conditions, recreational fisheries should not be granted de facto priority over the commercial fleet without clear legal and scientific justification.

Ultimately, this decision was made out of cycle, without sufficient data, and with inadequate consideration of its economic and social impacts on Alaskans who have invested heavily in this industry.

If coho returns are declining, the appropriate response is to determine the cause through proper analysis—not to assign disproportionate responsibility to one user group.

On behalf of myself, my family, and the broader fleet, I strongly urge the Board of Fisheries to repeal this decision and allow time for proper data collection and evaluation during the 2027 cycle.

Thank you for your consideration.

Sincerely,

Captain Kirian Kuzmin

F/V ARBITER



KENAITZE
INDIAN
TRIBE

April 30, 2026

Commissioner Doug Vincent-Lang
Alaska Department of Fish & Game
43961 Kalifornsky Beach Road, Suite B
Soldotna, AK 99669

RE: Proposal 192

The Kenaitze Indian Tribe (the "Tribe") is generally opposed to the proposed commercial seine fishery contemplated by Proposal 192.

The Tribe's over 2,200 members take part in commercial, sport, and personal use fisheries on the Kenai Peninsula. The Tribe appreciates and understands the importance of all aspects of area fisheries, including the commercial fisheries, yet objects to the creation of this new fishery on the grounds that the mortality of Chinook Salmon captured in this fishery is unknown.

The Tribe further submits a request to create a 7.5 mile buffer around the mouth of the Kenai river within which the seine fishery may not take place.

In the event that a commercial permit holder's lease sight falls within the 7.5 mile buffer the Tribe asks that they be enabled to engage in the seine fishery elsewhere.

The Tribe respectfully submits the attached language.

Duk'idli, respectfully,

Signed by:
Bernadine Atchison
B2149184874F445
Bernadine Atchison, Chair
Kenaitze Indian Tribe

www.kenaitze.org

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

P.O. Box 988 • Kenai, AK 99611

PROPOSAL 192**5 AAC 21.382. Kenai River Late-run King Salmon Stock of Concern Plan.**

Replace commercial set gillnet opportunity in the Kenai River Late-run King Salmon Stock of Concern Plan with a newly established set beach seine gear type, as follows

5 AAC 21.382(g) is amended to read:

(g) In the Upper Subdistrict of the Central District set gillnet commercial fishery,

(1) from June 20 through July 31, when the preseason forecast of king salmon 75 cm mid eye to tail fork and longer is greater than 14,250 fish, including harvest and forecast error, the Upper Subdistrict fishery may open to S04H CFEC permits as follows:

(A) allow for the use set beach seine, as defined in 5 AAC 39.105(6), as an alternative gear type for holders of a SO4H CFEC permits;

(B) one set beach seine may be used per a commercial set gillnet shore fishery lease site;

(C) the maximum legal limit for a set beach seine is 70 fathoms in length, 110 mesh depth including border and chaffing strips, and three and one-half inch mesh size throughout; notwithstanding, 5 AAC 21.332 set beach seines shall have no minimum length, depth or mesh size requirements;

(D) fishing with a set beach seine must occur from shore or waterline with one end anchored on shore and the outside end must be set and retrieved back to the shore or waterline using a running line;

(E) fishing with a set beach seine from shore or waterline must occur at the location of a shore fishery tract identified in the recorded plat for that AS 38.05.082 lease, or City of Kenai Lease or historically fished locations; nothing in this subsection affects or changes the terms or conditions of AS 38.05.082 lease or City of Kenai leases and its lessee;

(F) fishing with a set beach seine may not occur within 7.5 miles of the mouth of the Kenai River as denoted by a line from the green light tower on the north shore and an ADF&G marker on the south shore;

(G) openings will occur for two 12-hour periods per week, established by emergency order;

(H) retention of king and coho salmon is prohibited, except that a king or coho salmon that is mortally wounded or caught as defined in (j) in a set beach seine is subject to stipulations in (i) and (j) of this plan;

(I) the number of any king or coho salmon that are released must be recorded on a ADF&G fish ticket under disposition code for live release;

(1) a commercial dip net may not be operated within 600 ft of any part of a commercial set beach seine and no part of a commercial set beach seine may be operated within 600 ft of any part of another commercial set beach seine;

[FROM JUNE 20 THROUGH JUNE 30, WHEN THE PRESEASON FORECAST OF KING SALMON 75 CM MID EYE TO TAIL FORK AND LONGER IS GREATER THAN 14,250 FISH, INCLUDING HARVEST AND FORECAST ERROR, THE UPPER SUBDISTRICT SET GILLNET FISHERY MAY BE OPENED AS FOLLOWS:

(A) EACH SETNET PERMIT HOLDER MAY USE UP TO ONE SET GILLNET THAT IS NOT MORE THAN 35 FATHOMS IN LENGTH AND 29 MESHES IN DEPTH;

(B) IS OPEN FOR NOT MORE THAN TWO EIGHT-HOUR PERIODS;

(C) WITH A 48-HOUR CONTINUOUS CLOSURE PER WEEK, BEGINNING BETWEEN 7:00 P.M. THURSDAY AND 7:00 A.M. FRIDAY;

(D) FISHERY OPENINGS WILL BE BASED UPON SELDOVIA DISTRICT TIDE TABLES BY SECTION AS FOLLOWS:

(I) NINILCHIK RIVER MOUTH TO KASILOF RIVER MOUTH (STAT AREAS 244-21, 244-22), THREE HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(II) KASILOF RIVER MOUTH TO KENAI RIVER MOUTH (STAT AREA 244-31), FOUR HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(III) OPENING TIMES WILL BE BASED ON NOAA CERTIFIED TIDE TABLES;

(2) FROM JULY 15 THROUGH JULY 27, WHEN THE INSEASON PROJECTION OF KING SALMON 75 CM MID EYE TO TAIL FORK AND LONGER IS GREATER THAN 14,250 FISH, INCLUDING HARVEST AND PROJECTION ERROR, THE UPPER SUBDISTRICT SET GILLNET FISHERY MAY BE OPENED AS FOLLOWS:

(A) EACH SETNET PERMIT HOLDER MAY USE UP TO ONE SET GILLNET THAT IS NOT MORE THAN 35 FATHOMS IN LENGTH AND 29 MESHES IN DEPTH;

(B) IS OPEN FOR NOT MORE THAN TWO EIGHT-HOUR PERIODS;

(C) WITH A 48-HOUR CONTINUOUS CLOSURE PER WEEK, BEGINNING BETWEEN 7:00 P.M. THURSDAY AND 7:00 A.M. FRIDAY;

(D) FISHERY OPENINGS WILL BE BASED UPON SELDOVIA DISTRICT TIDE TABLES BY SECTION AS FOLLOWS:

(I) NINILCHIK RIVER MOUTH TO KASILOF RIVER MOUTH (STAT AREAS 244-21, 244-22), THREE HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(II) KASILOF RIVER MOUTH TO KENAI RIVER MOUTH (STAT AREAS 244-31, 244-32), FOUR HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(III) KENAI RIVER MOUTH TO BOULDER POINT (STAT AREAS 244-41, 244-42), FIVE HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(IV) OPENING TIMES WILL BE BASED ON NOAA CERTIFIED TIDE TABLES;

(3) FROM JULY 28 THROUGH AUGUST 15, WHEN THE INSEASON PROJECTION OF KING SALMON 75 CM MID EYE TO TAIL FORK AND LONGER IS GREATER THAN 14,250 FISH, ACCOUNTING FOR ANTICIPATED HARVEST, PROJECTION ERROR AND INSEASON RUN STRENGTH, THE UPPER SUBDISTRICT SET GILLNET FISHERY MAY BE OPENED AS FOLLOWS:

(A) EACH SETNET PERMIT HOLDER MAY USE UP TO ONE SET GILLNET THAT IS NOT MORE THAN 35 FATHOMS IN LENGTH AND 29 MESHES IN DEPTH;

(B) IS OPEN FOR NOT MORE THAN TWO EIGHT-HOUR PERIODS;

(C) WITH A 48-HOUR CONTINUOUS CLOSURE PER WEEK, BEGINNING BETWEEN 7:00 P.M. THURSDAY AND 7:00 A.M. FRIDAY;

(D) FISHERY OPENINGS WILL BE BASED UPON SELDOVIA DISTRICT TIDE TABLES BY SECTION AS FOLLOWS:

(I) NINILCHIK RIVER MOUTH TO KASILOF RIVER MOUTH (STAT AREAS 244-21, 244-22), THREE HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(II) KASILOF RIVER MOUTH TO KENAI RIVER MOUTH (STAT AREAS 244-31, 244-32), FOUR HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(III) KENAI RIVER MOUTH TO BOULDER POINT (STAT AREAS 244-41, 244-42), FIVE HOURS LATER THAN THE SELDOVIA DISTRICT LOW TIDE;

(IV) OPENING TIMES WILL BE BASED ON NOAA CERTIFIED TIDE TABLES;]

What is the issue you would like the board to address and why? This is a board-generated proposal.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Alaska Board of Fisheries (HQ-F26-BGP4)

Name: Zenon Martushev

Community of Residence: Homer Alaska.

Hello I didn't get an option to oppose 186. I'm a commercial fishermen and recreation user here in Alaska. I oppose 186 to the fact that coho is an August to September run. Closing down an area of a fleet that mostly focus on sockeye run it won't help anyone, it will flood the rivers, and kill off future runs. 98% of the fleet is stored away during the main coho run (August-September). Some years are slow with coho other years there's too much. As a recreation sports fishermen, me and my family have no problem getting our yearly bag limit. I oppose 186 because it's against the Alaska constitution. I'm opposing 186 for the sustainability for all Alaskan residents, sports and commercial fishermen please consider and vote no for 186.

Name: ilia Martushev

Community of Residence: Homer Alaska

hi I'm inquiring this comment to oppose 186, just not enough data to support this, thank you and please 🙏
make a wise decision, God bless you from my cook Inlet commercial fishing 😊 family,,

Name: BEN DOUMIT
Doumit Brothers Fish LLC

Community of Residence: CATHLAMET

I am writing to express my strong support for the petition requesting that the Alaska Board of Fisheries (BOF) repeal the regulations adopted under RC 161 for the Central District Drift Gillnet Fishery Management Plan in Upper Cook Inlet.

The regulations introduced via RC 161 have created significant imbalances in the management of Upper Cook Inlet salmon stocks. I urge the Board to consider the following points in support of a repeal:

Inconsistency with Scientific Management: The provisions within RC 161 often prioritize rigid, calendar-based closures over real-time, data-driven escapement goals. This undermines the department's ability to manage for the "Biological Escapement Goal" (BEG), which should remain the primary objective of any sustainable fishery.

Economic Impact on the Drift Fleet: The drift gillnet fleet is a vital pillar of the Kenai Peninsula's economy. RC 161 imposes restrictive "windows" and area closures that prevent the fleet from harvesting surplus sockeye salmon. This leads to the underutilization of a public resource and unnecessary financial hardship for local fishing families and support industries.

Over-Escapement Concerns: By severely limiting the drift fleet's efficiency, RC 161 increases the risk of massive over-escapement in the Kenai and Kasilof Rivers. Over-escapement can be just as detrimental to long-term stock health as under-escapement, potentially leading to smaller returns in future cycles due to competition for spawning grounds and rearing habitat.

Lack of Balance: The current regulations disproportionately favor one user group over another, disregarding the Board's mandate to provide for a fair and equitable allocation of the resource. Repealing RC 161 would allow for a return to a more flexible management style that reacts to actual run strength rather than arbitrary dates. The regulations adopted under RC 161 have proven to be an ineffective tool for holistic resource management. They hinder the harvest of abundant sockeye stocks without providing a commensurate conservation benefit to other species.

I respectfully request that the Board of Fisheries repeal the regulations adopted under RC 161 and restore management flexibility to the Alaska Department of Fish and Game to ensure the long-term biological and economic health of the Upper Cook Inlet.

Sincerely,
Ben Doumit
Doumit Brothers Fish LLC

Name: Joseph Person

Community of Residence: Anchor Point

Comments on proposal 192.

My name is Joseph Person and I am a lifelong third generation setnetter on the Ninilchik beach.

Proposal 192 is an absolute outrage just from a procedural perspective. This is a board generated proposal during an out of cycle year, when our regular meeting cycle is coming up next year. The proposal does not begin to meet a single one of the criteria that an out of cycle proposal is supposed to meet and even worse the exact language was already considered and voted on one year ago and double jeopardy of this sort is expressly forbidden for out of cycle proposals. Nothing about this proposal is legitimate from the processes and procedures layed out in regulation. It should be immediately shelved and submitted as a proposal for next years meeting.

As far as the actual substance of the proposal, it provides no new opportunity, merely replaces the limited setnet opportunity with nominal beach seine opportunity, but in the current environment a projection above the recovery goal prior to July 31 is exceedingly unlikely and consequently no beach seine opportunity can be reasonably expected to justify gearing up for a new experimental fishery. Nothing about the proposal achieves the boards stated goal of "gathering data". The whole thing is ridiculous.

Finally as to particulars of the beach seine plan, the six hundred foot setback to dipnets is complete unreasonable. There is no justification for it whatsoever and has the potential to completely disrupt the fledgling dipnet fishery which is the only proven alternative harvest method available to all setnetters.

I am sure we will be discussing all alternative gear options extensively next march once again, and any actions taken now are precipitous, unreasonable, and outside the process clearly layed out in regulation.

Joseph Person.

Name: Greg Reutov

Community of Residence: Homer

I fished in cook inlet since I was a kid with my dad, i oppose proposal 189 - 192 because if they close area one they will destroy kenai river do to over escapements, and leaving small area to fish for fisherman in cook inlet. Thank you for your consideration.



April 30, 2026

Marit Carlson-Van Dort, Chair and Board of Fisheries Members
Alaska Board of Fisheries
P.O. Box 25526
Juneau, Alaska 99802-5526

Re: Board process

Dear Chair Carlson-Van Dort and Board Members:

Concerned Area M Fishermen (CAMF) was founded 40 years ago and has been active in the Board of Fish process since. CAMF represents the interests of drift gillnet fishermen who fish in Area M. Our membership includes approximately 95% of the permit holders active in the fishery, which has been as high as 140 permit holders in the last three years. Our members rely on a fair, transparent, and consistent Board of Fisheries process to sustain their livelihoods and plan for the future in fisheries that have existed for over 100 years.

Alaska's Board of Fisheries process has long been recognized as a model for public engagement and balanced decision making. CAMF fully understands that this does not mean everyone is automatically happy at the end of a board meeting, but at least the process has played out. The Board of Fisheries has a long-established proud culture for those who have served on the board and donated significant time to the unique process. It's obvious this process is bigger than one individual or a group of board members. The fact that the board's website has the names of past members back to 1975 clearly shows the history of those that have served in the most important role in fisheries that the state has to offer.

CAMF is writing this letter to express serious concern regarding a pattern of recent board actions that depart from established process and undermine public trust in board decisions. The public spends significant time and effort preparing proposals for submission. ADF&G staff spend considerable effort and time preparing department comments on those proposals, followed by public testimony, submitting written comments, as well as involvement in the committee process. A Board of Fisheries meeting every 3 years is expected and with significant costs to attend since many people must travel to the meeting locations, the cost can be difficult for many to participate in more meetings than those that are scheduled every 3 years. Limiting the use of ACR's and Board generated proposals without justified circumstances should be expected. The board has recently produced allocative board generated proposals the day of deliberations, and 200 members of the public were not involved or able to critique or examine the impact of the board generated proposal on short notice or even comment on the amended or new proposal before the full board voted on the new proposal. We have seen confusion form the public, ADF&G staff, and even board members on the impact of the new unvetted language and the impacts to fishermen, families, and communities isn't fully understood until after the board proposal is passed. The lack of public input into board adopted proposals that occur at the last moment without any public input is jeopardizing the integrity and respect that the process deserves.

Eliminating a gear type in Cook Inlet without public testimony after another Cook Inlet proposal was recently approved just weeks ago is concerning. Multiple attempts to curtail/eliminate fisheries is certainly the perception many have, and it seems to be a targeted attempt by the board. Our concern is this will not end with just Cook Inlet.



Without meaningful course correction, continued erosion of public trust will further undermine the credibility of the Board and its decisions. The CAMF members are hopeful that you can restore the integrity of the board from clarifying suspect conflict of interest determinations, routinely using Board generated proposals without proper vetting and discussion with those impacted while reducing confusion even with board members, a return to integrity and transparency to the process, and overall trust to the board.

Thank you for your consideration,

CAMF Board of Directors

Date: April 29, 2026

To: Members, Alaska Board of Fisheries

From: Gale K. Vick, Fairbanks, Alaska

Re: Personal commentary for Board of Fish special Meeting May 1, 2026
Proposals 189, 190, 191 and 192

Prop #189 Adopt a policy on Traditional Knowledge into regulation

Support with amendments

Remove “or enhancement” from the proposed language as this is not a traditional activity in relation to commercial production.

Prop #190 Adopt the Stock of Concern Action Plan for Yukon River king salmon into Regulation

Support with substitute language as follows:

The majority of the ~~lower~~ UPPER bounds of the established BEG and SEG ranges are met or exceeded in five consecutive years and is expected to be met in the future years;

With critical mass for Chinook on the Yukon River being at such a dire level, and with the average weight as well as ASL (age-sex-length) being so much lower in recent years, the expectation to rebuild stocks must depend on meeting the *upper* end of escapement goals. In addition, it would be helpful to define “historical range” within the context of provisions to reduce designation to “stock of yield concern.”

Prop #191 Adopt Yukon River Fall Chum Salmon Stock of Concern Management Plan into regulation, as follows

Support with substitute language as follows:

Commercial fisheries in the Yukon River drainage shall be prohibited from July 13 through December 31.

It is becoming increasingly more difficult to determine if the drainage wide fall chum escapement goals are protecting discrete stocks. In addition, it would be helpful to define “historical range” within the context of provisions to reduce designation to “stock of yield concern.”

Prop #192 Replace commercial set gillnet opportunity in the Kenai River Late-run King Salmon Stock of Concern Plan with a newly established set beach seine gear type

Oppose

Creators of the recommended beach seine design should be commended but sufficient evidence in regard to the new beach seine methods protecting king salmon while prosecuting a sockeye fishery is still not available. Changing the gear type would be a considerable cost to most setnet fishermen. The proposed change would allow some fishermen to prosecute fishing while disenfranchising others. There should be a continued test fishery on the proposed methods until there is significant data to show if this works.

Name: Revelle Russell

Community of Residence: Homer

RE: OPPOSE Proposal 192, SUPPORT Repealing 186/RC 161

Dear Chair Van Dort,

My name is Revelle Russell. I live in Homer, AK. I have commercial fished in Alaska since 1994. I oppose Proposal 192 on process.

This Board of Fish seems its ok to take a proposal out of cycle, make major policy changes, advance it at the last minute with little or no public input.

This goes for Proposal 186/RC 161 which I support repealing.

By doing this, the Board is undermining the public process and losing any credibility with the commercial fishing industry and Alaskans in general. Thank you.

Name: Chris Perry

Community of Residence: Homer

My name is Chris Perry I live in Homer. I have seined Lower Cook Inlet and drifted upper Cook Inlet for about 38 years. I'd like to voice my opposition to proposal 192 beach seining in upper Cook Inlet on the east side beaches.

I have seined lower Cook Inlet for 38 years. I would like to say that I'm very concerned about catching any king salmon in beach seines and believe the mortality would be very high for these fish being seined up onto the beach in sandy water. If they are released alive, in all likelihood, they may be caught in another net on another site up the beach and again have possibility of mortality.

I have noticed catching King salmon with mixed with salmon species in clear deep water. The king salmon are the most fragile of all the five salmon species. If a king salmon comes up with 50 or 100 or 200 fish by the time that King salmon is separated out it is usually dead, even in crystal clear water.

Again, I would like to ask you to oppose proposed 192 I believe that this will put an end to the future King salmon runs in the Kenai and Kaslof rivers.

Thank you for this opportunity to comment

Name: Richsrd Petson

Community of Residence: Chugiak/Ninilchic

I strongly oppose proposal 192 for the following reasons :

-it's the second time certain members of the BOF have generated this proposal

it was voted down the previous time

- it is out of cycle and should be submitted by the public in the scheduled Uci fin fish meeting which is less then 12 month away

Eliminating set nets on the east side and substituting beach seines cuts every set netter with out beach nets out of the fishery which is at least 50%

-as written it removed two stock of concern openings in August

The 600' set back for dipnets is ludicrous and may disrupt the prosecution of the already established alternate gear type

- all setnetters have setnets three families I know of have beach seines

-this appears to be nothing more then an attempt by certain board members to please a special interest group and

Create punitive regulation for the 100 year old east side set net fleet.

Name: Teague Vanek

Community of Residence: Ninilchik, Ak

I am opposed to Proposal 192. There are many reasons to oppose this. Set netting has been a long standing traditional fishery and the infrastructure is already there to continue the fishery as a set net fishery. Changing it to a beach seine fishery, especially with the proposed conditions, would disenfranchise way too many current participants. Only a few would get benefit from the change and it would be at the expense of many.

Name: Andrew Umlauf

Community of Residence: Shoreline WA

I am writing today to oppose 186/rc161. This action was taken by the board behind closed doors without public testimony and violates the public process. Board actions like this erode trust and faith that the system works, and are very likely illegal. 186RC161 is a draconian measure that puts all of the supposed conservation burden on one user group, the drift fleet, which is already highly restricted for northern district conservation. No coho stocks are currently listed as stocks of concern, and incomplete escapement data shows no basis for 186RC161. I heard several board members say didn't believe in over escapement on the record. These restrictions are going to make over escapement far worse for sockeye. What will happen when 6 or 8 million sockeye go up the Kenai? But yet the board specifies escapement goals with a high end. You cannot have it both ways. Please vacate 186RC161 and let's take the issue of coho conservation up at the meeting in March. Let's actually collaborate and discuss what could be done instead of planning the drift fisheries eradication.

Name: Jayden Hollier

Community of Residence: Kenai Peninsula

Hello, my name is Jayden Hollier. I am 16 years old and a dual permit holder on the East Side of Cook Inlet. I am against Proposal 192. If Proposal 192 passes, as written, I will be part of the 88% of permit holders that will not be able to participate in the seine fishery, as my nets are outside gear.

Eliminating an entire industry of lifelong fishermen is not the answer to King Salmon conservation. I am a dual permit holder. That means I was once able to fish three full size Set Nets for each of my 2 permits. Now, as an East Side Set Netter, if I want to harvest Sockeye Salmon, I must wade up to my neck to attempt to scoop out one Sockeye at a time. A feat that is in no way profitable or reasonable. It is a mere insult to my four generation Set Net family. But as my only opportunity to commercial fish using my permit cards, I stand in the cold water and try my best to harvest every Sockeye I can, ONE at a time.

Seine fishing should ONLY be implemented as a tool to sustain Set Netters while King Salmon remain a stock of concern. Seine fishing should NEVER replace Set Netting in Cook Inlet. Set Netting will be a viable fishery again. The King numbers could potentially make their goal this 2026 season, and my family will be ready to SET NET with our shallow nets, targeting Sockeye and not King Salmon. Please do not erase this opportunity in which my family has worked so hard for.

Thank you for your time

Jayden Hollier



PO Box 73568, Fairbanks, Alaska 99707
www.yritfc.org

Date: April 30, 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Boards Support Section
Alaska Department of Fish & Game
PO Box 115526
Juneau, Alaska 99811-5526
Submitted electronically via: boardoffisheries.adfg.alaska.gov

Re: Formal comments in support of Proposals 189, 190, and 191 – Supplemental Special Meeting, May 1, 2026

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

The Yukon River Inter-Tribal Fish Commission (YRITFC) respectfully submits the following formal comments in support of Proposals 189, 190, and 191 for consideration at the Board's supplemental special meeting on May 1, 2026.

YRITFC is a Tribal consortium representing 44 state and federally recognized Tribal Governments and First Nations throughout the Yukon River watershed in Alaska and Canada, formed in 2014 in direct response to the ongoing and severe decline of Yukon River salmon runs. YRITFC's mandate is to act with a unified voice for the conservation and restoration of Yukon River fisheries, grounded in Indigenous Knowledge and the best available science. YRITFC's mission is to establish comprehensive co-management plans ensuring meaningful and substantive Tribal/First Nation participation in all aspects of fish stewardship to protect our traditional ways of life and the distinct customary and traditional Indigenous Knowledge and practices of our sovereign member Tribes and First Nations (YRITFC Constitution, revised and ratified by tribal resolution, May 14, 2024).

Yukon River Chinook (king) salmon and fall chum salmon have failed to meet drainage-wide escapement goals and Canadian border passage objectives for multiple consecutive years, notwithstanding severe restrictions and closures on subsistence and all other fisheries and almost 26 years of State of Alaska management of Chinook salmon under a Stock of Yield Concern designation pursuant to the Policy for Sustainable Salmon Fisheries Management (5 AAC 33.222). Under Chapter 8 of the Pacific Salmon Treaty and the 2024 – 2030 bilateral agreement

for Canadian-origin Chinook salmon, the United States is obligated to manage its fisheries to meet Canadian border passage objectives and stock rebuilding targets. The current rebuilding target is 71,000 Canadian-origin Chinook at the international border; preliminary 2026 projections indicate Canadian-origin returns of approximately 27,000 fish – well below that threshold. Canadian-origin fall chum salmon estimates for 2026 are projected to return with approximately 31,000 fish, well below the border objectives of 70,000 – 104,000 on the mainstem Yukon River and 22,000 - 49,000 for the Fishing Branch River. The urgency of these conditions makes codification of enforceable conservation frameworks an immediate priority, given the recent designations of both Yukon River Chinook and fall chum salmon as Stocks of Management Concern (see definitions in 5 AAC 39.222(f)(5) and (f)(22)).

More than 20 years ago, Indigenous Elders along the Yukon River shared their long-term observations suggesting that something was wrong with Chinook salmon health and nutrition as indicated by their decreasing body size and changes in shape and body condition. Had such traditional knowledge been taken more seriously, perhaps the application of precautionary management could have kept the current crises from being so severe. As a result of this historical experience among Indigenous subject matter experts, YRITFC urges the Board to adopt Proposal 189 to codify the 2024 Traditional Knowledge Policy and Proposals 190 and 191 concerning state fisheries management regulations for Yukon River Chinook and fall chum salmon, which are designated as Stocks of Management Concern.

Proposal 189

YRITFC represents Tribes and First Nations whose citizens have depended on Yukon River salmon since time immemorial. Our Tribes' and First Nations' food security, cultural identity, and continued existence are inseparable from these fish. In recent decades, unprecedented salmon declines and resulting subsistence fishing restrictions have had devastating impacts on Yukon River communities. Subsistence needs for salmon throughout the Yukon River watershed have not been met in many years. In such circumstances, and to avoid such circumstances occurring again in the future, it is imperative that the Alaska Board of Fisheries rely on all best available information, including our Indigenous Knowledge systems from throughout the Yukon River drainage.

Proposal 189 (5 AAC 96.6XX, new section) would codify a Board of Fisheries policy (2024-305-FB) explicitly recognizing local knowledge and traditional knowledge as “an important aspect of best available science” for Board decision-making. The proposal defines Traditional Knowledge – characterized by a long time scale, often local in scale, and grounded in generational knowledge, including worldview, reciprocity, and relationality – and distinguishes it from Local Knowledge, which is based on personal or shared experience and does not require Indigenous identity or long tenure. The proposal establishes a structured process for inviting knowledge holders nominated by their community, Tribe, or conservation organization to provide ten minutes of testimony to the Board, including alternative audio or visual media formats. The proposal also amends 5 AAC 01.249(1), the Yukon River Fall Chum Salmon Management Plan, to explicitly require that traditional knowledge be included alongside sonar passage estimates, test fisheries indices, and other data when assessing Yukon River fall chum salmon run size.

YRITFC strongly supports the adoption of Proposal 189. Codifying this policy in regulation serves three interconnected conservation objectives that align directly with YRITFC's mission:

- 1) ADF&G compliance and accountability. Placing the Board's Traditional Knowledge policy in the state administrative code (5 AAC) converts a non-regulatory statement of intent into a legally binding direction to the department and future boards. Inconsistent implementation of traditional knowledge provisions has been a persistent concern for Yukon River Tribes and First Nations. Regulatory codification establishes a clear standard of conduct that is subject to legal and administrative review and requires the department to document how traditional knowledge was considered in management decisions.
- 2) Institutionalizing the best available information. The Board's Sustainable Salmon Policy (5 AAC 39.222) and Mixed-Stock Fishery Policy (5 AAC 39.220) both require the use of best available science. Indigenous and local observations of run timing, species composition, environmental anomalies, and harvest conditions frequently identify conservation problems earlier than formal quantitative assessments – a critical advantage when Yukon River Chinook and fall chum salmon are already far below escapement and border passage thresholds and largely unavailable for customary and traditional uses. Codification ensures these data streams are systematically integrated rather than selectively acknowledged.
- 3) Strengthening early conservation response. Indigenous knowledge holders have observed multi-year declines in run strength, body size, and age composition that precede declines captured by escapement indices. A binding policy requiring the Board to solicit, document, and respond to traditional knowledge testimony improves the timeliness and precautionary quality of conservation decisions for Yukon River Chinook and fall chum salmon.

YRITFC recommends that the Board adopt Proposal 189 as written, or with amendments that further strengthen the enforceability of traditional knowledge provisions and the department's obligation to document its application in decision-making.

Proposal 190

Proposal 190 (5 AAC 05.XXX, new section) would adopt a formal Yukon River King Salmon Stock of Concern Management Plan into regulation. The proposed plan explicitly ties management to Alaska Statute (AS) 16.05.258 (subsistence law), 5 AAC 39.220, 5 AAC 39.222, the Pacific Salmon Treaty, and the 7-year bilateral agreement for Canadian-origin Chinook salmon.

Key provisions include:

- 1) Subsistence fishery restrictions may be relaxed in specific tributaries only where updated stock composition and run assessment data indicate that restrictions are no longer needed to meet established escapement goals;
- 2) Fish wheels operated under the plan may be required to conform to selective gear and fish-friendly construction requirements under 5 AAC 05.362(j)(1)-(2); and

- 3) The stock-of-concern designation may be recommended for removal only when the majority of lower bounds of established drainage-wide and tributary biological and sustainable escapement goal ranges (BEG and SEG, respectively) are met or exceeded in five consecutive years and are expected to be met in future years – with a pathway to ‘stock of yield concern’ designation if annual yields remain below the historical range.

YRITFC urges the Board to adopt Proposal 190, but rather than establish a new and separate Yukon River King Salmon Management Plan while under a Stock of Management Concern designation, modify the existing management plan in 5 AAC 05.360 to include specific management actions required while Yukon River Chinook salmon are designated a Stock of Management Concern and criteria whereby those rebuilding management actions would no longer be required.

YRITFC also recommends amending Proposal 190 to prohibit all commercial fishing, personal use fishing, and sportfishing, including catch-and-release fishing for Yukon River Chinook salmon, while Yukon River Chinook salmon are designated a Stock of Management Concern pursuant to the priority afford reasonable opportunities for customary and traditional uses before providing for non-subsistence uses (AS 16.05.258).

The adoption of specific management actions to rebuild Yukon River Chinook salmon within Proposal 190 will result in durable, enforceable departmental duties. Without codified stock-of-concern management actions, implementation of Chinook salmon conservation measures would depend on annual action plans and discretionary emergency orders that vary in timing and scope. Embedding management tools and thresholds in regulation creates durable, transparent, and enforceable requirements for the department to manage Yukon fisheries consistent with Chinook salmon escapement and border passage objectives, and with the precautionary management proscribed in the Policy for Sustainable Salmon Fisheries Management (5 AAC 39.222). The proposed regulations would also require documentation to justify any proposed change in stock-of-concern designation status.

The 2024–2030 bilateral Chinook agreement sets a rebuilding target of 71,000 Canadian-origin Chinook at the international border. Preliminary 2026 projections of approximately 27,000 Canadian-origin Chinook—consistent with 2024 Eagle sonar and genetic results—demonstrate that the rebuilding objective remains far from achieved. A codified plan instructing the department to implement conservation measures consistent with treaty obligations and current stock-status assessments is essential to avoid continued failure to meet rebuilding targets, which are designed to protect both US and Canadian First Nations’ customary and traditional fisheries.

Minimizing incidental catch of Chinook and fall chum salmon. By requiring management actions that prioritize the conservation of king salmon in mixed-stock fisheries and conditioning any relaxation of restrictions on current assessment data, the proposal supports a systematic transition toward more selective fishing practices. Selective fish wheel provisions serve to further reduce incidental harvest and handling mortality in mixed-stock environments where Chinook, fall chum, and other co-migrating species are most vulnerable while maximizing opportunities to harvest non-salmon fish.

The proposed rebuilding actions fail to include the use of 4-inch mesh gillnets in the mainstem due to concerns associated with unintentional and incidental harvest of Chinook salmon while

pursuing non-salmon or salmon stocks not experiencing conservation concerns (e.g., pink salmon or sockeye salmon).

The YRITFC maintains that the recovery of Yukon River king salmon hinges on the return of large, healthy, and productive female kings returning to the spawning grounds. This position is supported by traditional knowledge, which consistently recognizes that the latter portion of the run is disproportionately composed of female kings. This traditional perspective supports the long-held practice of removing nets from the water during the latter part of the run, a crucial measure to allow these larger females to escape harvest and contribute to stock restoration.

Despite 18-day gillnet closures in each district, timed to coincide with the first through third quarter points of the historic Chinook salmon run timing and local observation, more than 1,500 Chinook salmon and more than 8,500 summer chum were harvested in 2025 (JTC:5, 9). Such incidental harvest, especially during the later, female-heavy pulses, contributes to ongoing failures to meet established escapement goals that sustain these stocks for future generations.

Proposal 191

Proposal 191 (5 AAC 05.XXX, new section) would adopt a formal Yukon River Fall Chum Salmon Stock of Concern Management Plan into regulation. The proposed plan explicitly ties management to Alaska Statute (AS) 16.05.258 (subsistence law), 5 AAC 39.220, 5 AAC 39.222, and the Pacific Salmon Treaty.

Key provisions include:

- 1) Mandatory implementation of the Yukon River Drainage Fall Chum Salmon Management Plan (5 AAC 01.249) from July 13 through December 31;
- 2) Commercial fisheries in the Yukon River drainage are prohibited from July 13 through December 31 when the projected run size is less than 550,000 fall chum salmon;
- 3) Sport fishing for fall chum is restricted until subsistence opportunities are provided;
- 4) Subsistence fishing opportunities shall be provided when a harvestable surplus exceeding 300,000 fall chum above the drainage-wide lower escapement goal bound is expected;
- 5) Subsistence restrictions may be relaxed in specific tributaries when stock composition and run assessment data confirm local escapement goals will be met;
- 6) Fish wheels must use soft mesh basket sides, smooth chutes with closed-cell foam-lined sides, and must return fish immediately to the water consistent with selective gear construction requirements specified in 5 AAC 05.362(j)(1)-(2), with the permit holder attending at all times; and
- 7) The stock-of-concern designation may be recommended for removal only when the drainage-wide SEG lower bound of 300,000 fall chum has been met or exceeded in each of five consecutive years and is projected to continue to be met in future years – with a pathway to ‘stock of yield concern’ designation if annual yields remain below the historical range.

The YRITFC urges the Board to adopt Proposal 191, rather than create a new and separate stock of concern management plan, and amend the existing Yukon River Fall Chum Salmon Management Plan (5 AAC 01.249) to include rebuilding management action provisions while Yukon River fall chum salmon remain designated as a Stock of Management Concern and criteria whereby those rebuilding management actions would no longer be required.

YRITFC also recommends amending Proposal 191 to prohibit all commercial fishing, personal use fishing, and sportfishing, including catch-and-release fishing for Yukon River fall chum salmon, while designated a Stock of Management Concern. We also recommend amending the proposal to remove the requirement of obtaining a subsistence fishing permit under the selective fish wheel specifications modeled on 5 AAC 05.362(j)(1)-(2) except in areas of the Yukon Management Area where subsistence fishing permits already are required as specified in 5 AAC 01.230.

The adoption of specific management actions to rebuild Yukon River fall chum salmon within Proposal 191 will result in durable, enforceable departmental duties. Without codified stock-of-concern management actions, implementation of Yukon fall chum salmon conservation measures would depend on annual action plans and discretionary emergency orders that vary in timing and scope. Embedding management tools and thresholds in regulation creates durable, enforceable requirements for the department to manage Yukon fisheries consistent with fall chum salmon escapement and border passage objectives. The proposed regulations would also require documentation to justify any proposed change in stock-of-concern designation status.

YRITFC strongly supports adopting Proposal 191 with the recommended amendments discussed above. Lower-river, U.S., and Canadian tributary escapement goals for fall chum have not been consistently achieved since 2020. Canadian mainstem and Fishing Branch River fall chum escapement objectives are projected not to be met in 2026 for the sixth and eighth consecutive year, respectively. Codifying the fall chum stock-of-concern plan in regulation compels the department to implement precautionary measures—including commercial closures below the 550,000 run-size threshold and a subsistence-first allocation—until drainage-wide and tributary escapement goals and Canadian border passage obligations are consistently achieved. Without codification, these protections remain vulnerable to administrative discretion and year-to-year inconsistency.

Proposal 191 also provides explicit, data-driven criteria for removal or downgrading of the stock-of-concern designation only after five consecutive years of meeting drainage-wide and all tributary escapement goals.

YRITFC supports the proposal's intent to minimize incidental catch and protect co-migrating salmon stocks experiencing conservation concern. Fall chum, summer chum, and Chinook salmon frequently co-migrate in the Yukon mainstem, and both species are failing to meet escapement and border passage objectives simultaneously. Prohibiting commercial fishing below defined run thresholds, conditioning subsistence opportunity on a defined harvestable surplus, and requiring selective gear minimizes incidental harvest of both species in a multi-species, mixed-stock fishery. These measures are necessary to support the rebuilding of Canadian-origin fall chum stocks and to fulfill U.S. obligations to deliver specified fall chum numbers to the Canadian border under Chapter 8 of the Pacific Salmon Treaty. These measures also support the rebuilding of Alaskan stocks.

By requiring management actions that prioritize the conservation of Yukon fall chum salmon in mixed-stock fisheries and conditioning any relaxation of restrictions on current assessment data, the proposal supports a systematic transition toward more selective fishing practices. Selective fish wheel provisions further reduce incidental harvest and handling mortality in mixed-stock environments where Chinook, fall chum, and other co-migrating species are most vulnerable while maximizing opportunities to harvest non-salmon fish.

The proposed rebuilding actions contained in Proposal 191 fail to include the use of 4-inch mesh gillnets in the mainstem due to concerns associated with unintentional and incidental harvest of Yukon River fall chum salmon while pursuing non-salmon.

There is broad recognition that small mesh gillnet subsistence opportunities to target non-salmon have unintended consequences that are harmful to migrating salmon. However, there is also a unified consensus among YRITFC member Tribes that “we are being regulated into hunger,” that additional gillnet restrictions would be detrimental to people’s ability to feed their families with non-salmon foods, and that additional restrictive regulations would not fix the problem. The YRITFC commends and strongly endorses ADFG and USFWS’s efforts to create opportunities for subsistence fishing for non-salmon with 6-inch mesh gillnets in non-salmon-spawning tributaries where the incidental harvest of salmon will be minimal.

Despite subsistence fishing opportunities being restricted to selective gear and a reduced fishing schedule for manned fish wheels and 4-inch gillnets, the YRITFC acknowledges that over 4,400 Yukon River fall chum salmon were harvested in 2025 (JTC 2026:7-9). It is well accepted that such incidental harvests contribute to ongoing failures to reach established escapement goals to sustain these stocks for future generations. As such, we are committed to addressing these matters locally and firmly believe that rebuilding salmon stocks cannot succeed without investing in Yukon River fishing communities.

We look forward to a continued partnership to incorporate Traditional Knowledge in a manner that meaningfully informs decision-making. Furthermore, we look forward to carrying out the essential rebuilding work that falls outside the scope of existing Yukon fisheries management, action, and rebuilding plans.

Conclusions

Adoption and codification of proposals 189-191 are necessary steps to ensure departmental compliance and accountability to the sustainable salmon fisheries management policy, to require systematic use of all best available information, including traditional knowledge, and to minimize incidental harvest of Yukon River Chinook and fall chum salmon as the United States and State of Alaska work to meet drainage-wide and tributary escapement objectives and treaty obligations to Canada. Rebuilding management actions are critical to restoring sustainable subsistence salmon fisheries for Yukon River Tribes, First Nations, rural residents of the Yukon River drainage, and other Alaskan residents, and to supporting non-subsistence fishing activities and uses.

YRITFC appreciates the Board's consideration of these comments and remains committed to working collaboratively toward the conservation and restoration of Yukon River salmon for present and future generations.

Sincerely,



Robert Wright Sr.
Chair
Yukon River Inter-Tribal Fish Commission

References Cited:

JTC (Joint Technical Committee of the Yukon River U.S./Canada Panel). 2026. Yukon River Salmon 2025 Season Summary and 2026 Season Outlook. Yukon JTC (26)-01, March 2026.

Respectfully submitted on behalf of the 44-member Tribal Governments of the Yukon River Inter-Tribal Fish Commission.

Name: Javin Schroeder

F/V Maria B

Community of Residence: Homer, AK

Dear Commissioner and Board of Fish members,

I am providing comments in support of an emergency petition to remove 186RC161.

I am the owner and operator of F/V Maria B in the UCI drift gillnet fishery, and a 3rd generation commercial fisherman in Upper Cook Inlet.

I strongly support the need to remove 186RC161 for the following reasons:

-RC161 was introduced too late for any public testimony or participation. The Board voted on late substitutive language that contained drafting and authoritarian issues. This was pointed out by a Board of Fish member Tom Carpenter who said he did not receive the substitute language until that morning and that “the public process is lost to a certain degree,” he then recused himself before the vote.

-ACR 5 was used to carry materially allocative rewrite. It repealed Area 1, removed management options such as Area 2 and Anchor Point, changed the one-percent rule to a three-percent rule for part of the season, imposed Tuesday and Friday windows, and created a two-mile shoreline prohibition. This was a major rewrite of the drift management plan, not a housekeeping fix. With an estimated Upper Cook Inlet sockeye salmon total run forecast predicted to be excellent at 7.60 million fish, this rewrite is overly restrictive and appears punitive. Board of Fish member Tom Carpenter stated, 52:37-53:53: “I do think this is a highly allocative proposal.”

-ADFG listed their stance on Proposal 186 as neutral in its summary table. The Department stated adoption would likely reduce drift harvest while also reducing its ability to achieve Kenai and Kasilof sockeye escapement and inriver goals.

-Coho conservation records are incomplete and inconsistent. ADF&G stated that Deshka coho weir counts have been incomplete since 2020 and represent a minimum count, that Little Susitna counts were incomplete from 2021 through 2024, that Fish Creek and Jim Creek met goals in completed recent years. This conservation rationale that was not fully supported, was inconsistent with internal UCI sockeye management needs.

The petition itself does a very good job at outlining reasons with well researched support, and verbatim quotes and conversations from BOF meetings

Please understand that commercial fishermen harvest for our income, but we deeply recognize that conserving salmon and their habitat is critical to the economy and the future of Alaska. This emergency petition would not be on your table unless due process was seriously overlooked. Please take this comment into strong consideration, as your decisions weigh the livelihoods of thousands of Alaskans.

Thank you for your attention.

Sincerely,

Javin Schroeder

F/V Maria B

Alaska State Legislature


Committees:

Chair House Rules
 Chair House Fisheries
 Member Transportation
 Member Legislative Council
 Member Joint Armed Services

Finance Sub-Committees:

Fish & Game
 Transportation
 Governor
 Legislature

Session:

Alaska State Capitol, 216
 Juneau, AK 99801
 Phone: (907) 465-2487
 Free: (800) 865-2487

REPRESENTATIVE LOUISE STUTES

Rep.Louise.Stutes@akleg.gov
 House District 5-Kodiak, Cordova, Seward

Interim:

305 Center Avenue, Suite 1
 Kodiak, AK 99615
 Phone: (907) 486-887

Date: April 30th, 2026

To: Members of the Alaska Board of Fisheries

Re: Public Process, Public Trust, and Ethics Concerns, Again

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

As I wrote in my previous letter, I am deeply concerned about the erosion of public process and transparency at the Board of Fisheries. The May 1st Special Meeting only reinforces these concerns. This meeting to handle “Supplemental Proposals” was noticed at the last minute, leaving little opportunity for stakeholders and user groups to digest the proposals, much less prepare comments and recommendations. The online format, with no option for oral testimony, further limits public involvement in the deliberations.

Typically, a special meeting would be used to consider emergency proposals submitted by the public in between regular Board meetings. In this instance, however, the special meeting is for Board-generated proposals that are not emergencies. The Board should have addressed these proposals at the March meeting on Statewide Finfish and Supplemental Issues, or should take them up at a future meeting that would allow for proper public engagement.

The above is especially true for Proposal 192 which would, “remove the set gillnet fishing opportunity from the East Side Set Gillnet Fishery (ESSN) and replace it with provisions for set beach seine nets.” This is being proposed under the guise of the Kenai Late-Run King Salmon Stock of Concern Management Plan. However, the ESSN hardly presents a clear and present danger to Kenai King Salmon stocks. In 2025, ESSN operations only caught 7 King Salmon while harvesting nearly 43,000 Sockeye on 82 permits. That is impressively low bycatch by any standard. In comparison, a 2024 test beach seine fishery in the same area caught 16 Kings on only 2 permits. This is more than double the bycatch on 1/40th of the permits.

Replacing an entire gear-type with a brand new one is extremely complicated, expensive and burdensome. Making this change only months before the fishery is set to open leaves insufficient time for permit holders to purchase gear and implement an entirely new way of fishing.

For these reasons, this proposal should be tabled and brought up again at the Upper Cook Inlet Finfish meeting tentatively scheduled for March 2027. As a 12-day regular meeting held in person, it is a much more appropriate venue to deliberate on this proposal, and to solve the myriad challenges that must be addressed in order to substantially alter a fishery with over 80 active permits.

As the Alaska Board of Fisheries, your decisions have immense impact on the lives and livelihoods of fellow Alaskans. As such, it is vital that your decisions be made with all of the scrutiny, transparency and process that such a weighty responsibility requires.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

Representative Louise Stutes
Chair, House Rules Committee
Chair, House Fisheries Committee

Name: Robert Begich

Community of Residence: Soldotna

I am submitting public comment in opposition to proposal 192. The change sought by this proposal (to replace set gill nets and replace them with beach seines) was previously previewed at a 2025 board meeting was not adopted by the Board of Fisheries. This proposal is not in the best interest of the communities of the Central Kenai Peninsula. As such the change sought by this proposal should be taken-up "in-cycle" allowing adequate review, public vetting and Department of Fish and Game input necessary for the subject relative to the management of Cook Inlet fisheries. If adopted the change in regulation, does not contribute to delivering the Chinook salmon or sockeye salmon escapement objectives. In addition, authority, specific regulatory framework and issues related to the CFEC remain would remain unresolved. Regulations for the emerging fishery should be developed in concert with authorities so it can be realistically implemented by the Department of Fish & Game.



April 30, 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Boards Support Section
Alaska Department of Fish & Game
PO Box 115526
Juneau, Alaska 99811-5526

Submitted electronically via online portal.

Re: Support for Proposals 189, 190, and 191 – Supplemental Special Meeting, May 1, 2026

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

The Arctic-Yukon-Kuskokwim Tribal Consortium (AYKTC) appreciates the opportunity to provide comments in support of Proposals 189, 190, and 191 for consideration at the Board's supplemental special meeting on May 1, 2026.

The Arctic-Yukon-Kuskokwim (AYK) Tribal Consortium comprises three Tribal organizations that collectively serve 98 Tribes across the AYK region: the Association of Village Council Presidents, the Kuskokwim River Inter-Tribal Fish Commission, and the Yukon River Inter-Tribal Fish Commission. Together, we work to protect, restore, and conserve the health and biodiversity of the Bering Sea and North Pacific ecosystems, rivers to seas, with a focus on the health of wild salmon to sustain our Alaska Native ways of life for this and future generations.

AYKTC recognizes the Alaska Board of Fisheries' statutory responsibility to conserve fishery resources for sustained yield and to ensure that management decisions reflect both the best available science and the lived realities of those most directly dependent on these resources.

Support for Proposal 189

The AYKTC is deeply invested in any and all ongoing efforts to incorporate Indigenous Knowledge in the management of our traditional lands and waters. Our members have stewarded the Arctic-Yukon-Kuskokwim ecosystems for generations, and our existence is interwoven with that of the salmon in these rivers-to-seas waters. Despite this knowledge and experience gathered for millennia, our Alaska Native Tribes have been cut out of the decision-making processes regarding fisheries management, including at the Board of Fisheries. In the face of the looming salmon crisis, with

unprecedented declines severely impacting communities' food security and traditional ways of life across the AYK region, it is more urgent than ever that Tribal knowledge systems be utilized and prioritized into every stage of the decision-making process as we work to conserve and rebuild salmon stocks.

To this effect, the AYKTC strongly supports Proposal 189, which would recognize local knowledge and traditional knowledge as an important aspect of best available science and would establish a process by which Traditional Knowledge holders who are recognized and nominated by their community, tribe, or organization would be invited to participate in all Board data collection and knowledge gathering processes.

AYKTC emphasizes that the meaningful incorporation of Traditional Knowledge must extend beyond procedural inclusion and into substantive decision-making. Traditional Knowledge provides place-based, longitudinal observations of ecosystem change that are essential to understanding salmon population dynamics in a rapidly changing Arctic environment, and its consideration should materially inform Board deliberations, regulatory outcomes, and adaptive management decisions.

We appreciate that this proposal differentiates 'Traditional Knowledge,' a distinct way of knowing tied to Tribal culture and experience, from 'Local Knowledge,' which represents a broader type of knowledge gained from lived experience and observation from a region, and we support the priority given to Traditional Knowledge holders to allow them to participate in Board meetings through unique Traditional Knowledge reports.

While we consider all available forms of knowledge gathering to be important to the sustainable management of state fisheries, we also urge the Board to explicitly prioritize gathering Traditional Knowledge from Tribes and Tribal communities before seeking Local Knowledge from non-Indigenous sources. The AYKTC suggests modifying the language in this proposal to clarify that Traditional Knowledge holders must be recognized and nominated by Tribes, Tribal Governments, Tribal communities, or Tribal Organizations, in order to respect Tribal sovereignty and ensure that Indigenous knowledge shared with the Board is conveyed by those authorized to speak on behalf of their people. The AYKTC further suggests removing the time limit language, to remain silent on time, in deference to our Traditional Knowledge holders.

Support for Proposals 190 and 191

AYKTC Tribal communities are deeply and negatively affected by declines in salmon returns and subsistence fishing opportunities. The loss of our region's primary food source gravely impacts the holistic health and well-being of our people and our ecosystems.

On the Yukon River, the complete collapse of several species of salmon – including Chinook and fall chum salmon – is having catastrophic effects to communities' physical and emotional health, food security, spirituality, and culture and traditions. The loss of salmon is also causing ripple-effects

throughout the wider ocean-to-river ecosystem, affecting apex predators like bears, wolves, and eagles. It is critical that all fisheries management entities, including Board of Fisheries and Alaska Department of Fish & Game, utilize every tool available to protect, conserve, and restore the health and abundance of Yukon River salmon.

Central to this responsibility is the Board's constitutional and statutory obligation to manage fishery resources for sustained yield. When salmon returns fall below levels necessary to meet escapement goals and subsistence needs, conservation

Alaska Statute 16.05.258 establishes subsistence as the priority use of fisher resources in times of shortage. The prolonged failure of Yukon River Chinook and fall chum salmon stocks has created precisely such a shortage, and continued harvest opportunity in non-subsistence fisheries during stock-of-concern conditions undermines both conservation objectives and the State's legal obligation to protect subsistence uses.

The AYKTC thus supports Proposals 190 and 191 to adopt formal Yukon River King and Fall Chum Salmon Stock of Concern management plans, respectively, into regulation, with the following modifications as proposed by our member organization, the Yukon River Inter-Tribal Fish Commission (YRITFC), in their letter to the Board:

1. Adopting these as modifications to existing management plans while Yukon River Chinook and fall chum salmon are designated as stocks of management concern.
2. Prohibiting all commercial fishing, personal use fishing, and sportfishing, including catch-and-release, while Yukon River Chinook and fall chum salmon are designated as stocks of management concern.

AYKTC specifically supports the prohibition of sport fishing, including catch-and-release fisheries, during periods when Yukon River Chinook and fall chum salmon are designated as stocks of management concern. Even low levels of handling mortality, cumulative stress, and enforcement complexity pose unacceptable risks to salmon recovery when populations are at critically low levels.

These measures are not intended to permanently limit access, but rather to provide a clear, precautionary, and recovery-focused framework that allows salmon populations to rebuild to levels that can once again support subsistence, commercial, and sport fisheries. Establishing these management plans in regulation provides transparency, accountability, and a pathway forward grounded in measurable objectives.

The AYKTC is optimistic that consideration of these three proposals represents a strong commitment from the Board to the conservation and sustainable management of Alaska salmon. We hope that the Board will follow through on this commitment by adopting these proposals with proposed modifications at the upcoming Supplemental Special Meeting.

Respectfully,



Vivian Korthuis, CEO
Association of Village Council Presidents



Kevin Whitworth, Executive Director
Kuskokwim River Inter-Tribal Fish Commission



Robert Charles Wright, Sr., Chair
Yukon River Inter-Tribal Fish Commission

Name: Steve Brown

Community of Residence: Homer

Support for Emergency Petition on Proposal 186 RC 161.

I support this issue being submitted for reconsideration at the regular UCI regulatory meeting scheduled for next winter, for the following reasons:

- 1) Originally it is debatable that ACR 5, adopted by the Board at its October work session, met the criteria the Board set for itself for adopting a regulatory issue out of cycle. The Board adopted this ACR on a 4-3 vote. The Department of Fish and Game in their written comment felt the ACR did not meet the Board's published criteria for ACRs, nor did most of the stakeholders potentially affected. This issue should be vetted at a regular regulatory meeting.
 - 2) The final action the Board voted through was substantially different, and far more impactful to the public, than what ACR 5 sought for coho harvest mitigation. There was little public input on the final action as the amended language was adopted and voted on after public testimony was concluded. Substantial change to a fishery shouldn't normally happen through the ACR process, particularly when Dept. staff doesn't even agree on the conservation need.
 - 3). The Board of Fisheries has established a formal policy for conservation of a salmon stock under its "Stock of Concern" procedure. If indeed the Board's intent was coho conservation, then shouldn't the Deshka and Little Susitna coho stocks have been designated as stocks of concern first before the Board took the dramatic regulatory action that it did? Due to ongoing lack of reliable escapement information, there was no consensus that either of these met stock of concern criteria.
 - 4). The federal TAC for coho in the EEZ is indeed lower for 2026 than 2025, as pointed out by the State in their staff comments. By only 140 coho total. The Council's Science and Statistical Committee (SSC) actually recommended a modest increase in the coho TAC of about 10,000 fish, but that was rejected by the State of Alaska delegation on the NPFMC. The SSC felt comfortable with coho stock status in the Inlet for this recommendation, so in this regard they were in agreement with ADF&G staff in their original comments on ACR 5.
 - 5). The public deserves a transparent Board of Fisheries decision making process.
- Oppose Proposal #192. This should have been submitted for consideration at the regularly scheduled meeting for Upper Cook Inlet.

Name: Richard Greg Encelewski
Ninilchik Natives Association

Community of Residence: Ninilchik

I'm a life-long fisherman set-netter I have a set-net site at Clam Gulch. I'm responding to proposal 192 and I'm in opposition for the following reasons:

This is not practical and only a few people would be able to conduct this type of fishery. More than likely 85% of set-netters would not be able to seine fish due to kelp, trash, rocks etc. It would not be practical for a seine fishery. Also, what are they going to do with our setnet permits, do we all lose out? I believe a fish trap proposal would be very advantageous if there was a new type of proposal for fisheries. I could explain more if there is ever an interest. I just heard about this and deadline is today, I would like to explain more, but this is by far the craziest idea I've ever heard. Please respect all fisherman and livelihoods of the setnetters.

William Faulkner

186, RC161, 192

Dear Board of Fisheries members,

I submit this as a brief comment; largely echoing the concerns of many residents of this great state. The undeniable fact that I am forced to write this in haste; having received notice at 8:30 AM this morning with a deadline of 5:00 PM this afternoon shines a blinding light on the complete erosion of public process that has occurred under your tenure.

Regarding 186, RC161 - In short there is no compelling new data to justify any out-of-cycle action. A lack of escapement data due to fall flooding should not be used as weak footing for masking allocative decisions. There has been no discussion of run timing and its lack of correlation to the Upper Cook Inlet drift fishery season and effort. ADF&G's own data shows a majority of the northern Cook Inlet coho salmon run occurs in middle to late August. There has been no discussion of habitat degradation; irresponsible development, beaver dams obstructing salmon migration, invasive pike, increase in stickleback populations, and an uncapped, unsustainable, in river guide and sports industry.

Regarding 192 - An attempt to eradicate a 144yr old fishery, using an out-of-cycle process; further highlights an alarming amount of elitism, bias, and lack of respect for the citizens you should be honored to serve. I would encourage you all to revisit the Alaska Executive Branch Ethics Act.

In closing I implore the board to address these issues in-cycle. In a manner that allows time for all stakeholders to participate; and for the board to rule with a maximum amount of information and transparency. History will consider your decisions as a testament to your honor, character, and ethics, or lack thereof.

Sincerely,

William Faulkner



ALASKA SALMON ALLIANCE
110 N. Willow St. #108
PO Box 586 Kenai, AK 99611
www.aksalmonalliance.org
Email: info@aksalmonalliance.org

April 30, 2026

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

Submitted Through Board Portal

Re: Opposition to Proposal 192

Dear Members of the Alaska Board of Fisheries,

The Alaska Salmon Alliance (ASA) is a nonprofit organization representing commercial seafood processors, fishermen, and allied businesses. Our mission is to promote science-based salmon management to preserve habitats, ensure sustainable fisheries, and create predictable harvests for all salmon users in the Cook Inlet region. We are committed to supporting long-term economic opportunities for Alaska's coastal communities and future generations.

We are submitting comments in opposition to Proposal 192, focused specifically on process, consistency, and statutory structure rather than on the merits of beach seine gear as a conservation tool. At the March 2025 statewide meeting, the Board considered RC 072, which proposed replacing set gillnet gear with beach seine gear in the Upper Subdistrict; that proposal did not pass. During that same meeting, members of the Board also expressed a preference for eliminating gill nets in Cook Inlet altogether. Proposal 192 reintroduces substantially similar language and intent, and in that context raises concerns that it may represent a continued effort to advance that broader objective. Reconsidering a previously rejected concept within such a short timeframe raises concerns about process consistency and the finality of Board decisions. Stakeholders rely on Board actions to provide stability and predictability, particularly following deliberation and a formal vote.

Proposal 192 is a Board-generated proposal, and while the Board has the authority to introduce proposals, this situation presents a unique concern in that the Board is acting as both the originator and the decision-maker on a proposal that would fundamentally alter participation in an existing fishery. This dual role warrants a heightened level of scrutiny and transparency, particularly when the proposal involves significant structural changes rather than incremental

regulatory adjustments. The proposal is also being considered at an out-of-cycle meeting, marking the fifth Board of Fisheries meeting addressing Cook Inlet issues since the last regular Upper Cook Inlet cycle. The Board's established regulatory cycle exists to ensure adequate public participation, predictability for stakeholders, and an orderly and comprehensive review of complex issues. Repeated out-of-cycle actions on the same region and subject matter risk undermining that structure, compressing the public process and creating uncertainty for participants who depend on a stable regulatory environment.

Although not the primary focus of this comment, it is important to note that both the Alaska Department of Fish and Game and the Commercial Fisheries Entry Commission (**included below**) have identified implementation concerns associated with this proposal. It has been acknowledged that implementation would require action by the Commercial Fisheries Entry Commission and that the proposal, as written, may extend beyond a simple gear modification and raise questions regarding consistency with the Limited Entry Act. These unresolved issues further support the need for a more deliberate and coordinated process before advancing this proposal.

Proposal 192 represents a significant change to an existing fishery through the replacement of a gear type. Given that a substantially similar proposal was recently considered and rejected, that the current proposal originates from the Board itself, that it is being advanced through repeated out-of-cycle meetings, and that it raises acknowledged implementation and structural questions, we respectfully request that the Board reject proposal 192.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Norm Darch", written in a cursive style.

Norm Darch
Executive Director
Alaska Salmon Alliance



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Commercial Fisheries Entry Commission

Mailing Address: Box 110302
Juneau, Alaska 99811-0302
Physical Address: 8800 Glacier Highway, Suite 109
Main: 907.789-6160
Licensing: 907.789-6150
Fax: 907.789-6170

To: Märit Carlson-Van Dort, Chair
Alaska Board of Fish

Date: April 6, 2026

From: Rick Green, Chair
Commercial Fisheries Entry Commission

Subject: CFEC Comments on
Proposal 192

The Commercial Fisheries Entry Commission (CFEC) offers the following comments regarding the proposal to allow Cook Inlet S04H set gillnet permit holders to use seine gear as an alternative during times of conservation for king salmon in the Central District of the Upper Cook Inlet Management Area. This proposal would require subsequent action by CFEC to go into effect. This memo outlines CFEC concerns so that subsequent action by CFEC can proceed as quickly as possible. Any changes to CFEC administrative code must go through a public comment process and will be exhaustively researched by CFEC staff before any permanent changes to administrative code are made. This memo is not meant to guide the board of fish (BOF) in their decision-making process, but rather to inform the BOF of what CFEC considerations will be if this proposal passes.

CFEC notes that its interest in this proposal is limited to whether the proposed gear change would be compatible with the Alaska Limited Entry Act and associated statutes. Questions regarding allocation, inseason management, conservation, and the broader desirability of the proposal as a management matter are properly left to the BOF and the Alaska Department of Fish and Game (ADFG).

CFEC has previously distinguished between changes in the method of fishing by existing permit holders and changes that would effectively create a new class of participation or substantially alter the nature of the fishery. That distinction is important here. If this proposal merely authorizes existing S04H permit holders to use an additional gear type during times of conservation, while keeping participation attached to the same limited entry permits already authorized in the Cook Inlet set gillnet fishery, it would not necessarily be inconsistent with limited entry solely because a different gear type is used.

If the proposal removes the ability to use set gillnets during those periods and instead allows participation only by beach seine with no clear guidelines on when set nets may be used, it will go beyond a gear modification and more closely resemble the creation of a new fishery. CFEC does

not have statutory authority to impose or enforce limitations on a fishery that has not undergone limitation proceedings. In addition, the Alaska Constitution makes clear that fisheries may be limited only for purposes of resource conservation or to prevent economic distress among fishermen.

CFEC has taken steps to expedite its internal processes should this proposal pass in a manner that does not conflict with the Limited Entry Act. However, implementation would still require review by the Department of Law, which typically takes 60 days or more. The current timeline leaves limited opportunity to draft regulations, gather public comment, complete legal review, and implement the changes in an orderly manner.

CFEC also notes that, as written, the proposal effectively eliminates the use of set gillnets during king salmon conservation measures. Rather than adding beach seine gear as an option, it would require harvesters to use beach seine or dip nets to participate at all. That distinction is significant — mandating a gear change is fundamentally different from authorizing an alternative. In addition, some harvesters may be unable to use beach seines due to a lack of suitable shoreline access.

Implementation Considerations Under Limited Entry Act

The proposal appears to state that each commercial set gillnet shore fishery lease site allows one complement of gear. That approach is inconsistent with the Limited Entry Act, which ties gear authorization to the permit—not the lease site. In some fisheries, including this one, individuals may hold multiple permits and are therefore authorized to fish multiple complements of gear. Individuals may lease up to three Department of Natural Resources sites in Cook Inlet, therefore this proposal could allow up to three compliments of gear for some individuals. Tying gear limits to lease sites rather than permits would conflict with the structure of limited entry.

CFEC does not believe it is the Board of Fisheries' intent to tie participation to lease sites. We would appreciate clear guidance as to what constitutes a single complement of gear for a single permit in the context of beach seines, as well as whether any provision would be made for additional gear allotments when an individual holds multiple permits. We understand that, given the need for conservation, the board may not wish to authorize additional gear for additional permits. The provisions for set gillnet gear found in 5 AAC 21.331(d) provide a clear example of what a complement of gear is for a set net in this fishery: requirements for a single set net as well as total aggregate net length are defined per permit holder.

The board may also wish to revise the language found in 5 AAC 21.382(g)(1)(B) of the proposal to state that “no more than one set beach seine may be used per commercial set gillnet shore fishery lease site.” This would remove ambiguity and make it clear that additional fishery shore lease sites do not authorize additional gear. We also believe this language is more in line with the board's intent.

only 283 Department of Natural Resources lease tracts existed¹. Of those 283 tracts, only 99 appear to touch the shore (figure 1). CFEC has no information regarding the number of unleased historical sites. This proposal could therefore have the practical effect of allowing only certain individuals with shore-connected lease sites to fish beach seine gear, while limiting other participants to dip net gear.

We note that set net gear may be deployed from a vessel offshore, and that many lease sites are not shore-connected. At present, there is sufficient space in the fishery for 400 plus participants. CFEC notes that some individuals who operate from vessels and do not have shore-based leases could be limited to exclusively dip nets. This would amount to a limitation on fishing opportunities among existing participants.

Economic Implications of a New Gear Type

Seine gear is expensive. The adoption of seine gear would still represent a significant investment for a group of harvesters that already own and rely on set gillnet gear. Requiring additional capital investment from a fleet already facing economic constraints is a relevant consideration, particularly where the proposal would operate only during periods of conservation restriction.

CFEC also notes that at this time of year producers of commercial fishing gear are booked out for at least a month. It is doubtful that this backlog will decrease as we approach the fishing season, and since this meeting is happening in May, it will be difficult for people to get gear prepared in time for the commercial fishery.

CFEC generally views shore-based seine operations as more economically feasible than dip net operations, or than no fishing opportunity at all. We commend the board for thinking creatively about how to preserve some harvest opportunity during periods of king salmon conservation. In that respect, the proposal appears aimed at maintaining participation and some level of economic activity in circumstances where traditional gear use may not be appropriate from a conservation standpoint.

CFEC also submits Figure 2, which shows in real dollar terms how the total exvessel value of the fishery has declined over the past 40 years. That long-term decline provides useful economic context for evaluating this proposal. Harvesters in this fishery are not operating in an environment of growing value and expanding margins. Any requirement that they replace or supplement existing gear with a materially different harvest system should therefore be considered in light of the fishery's diminished long-term economic performance.

¹ CFEC. 2023. Findings and Results from a Modified Optimum Number Study on the Cook Inlet Set Gillnet Fishery. CFEC Report No. 22-03N. CFEC, Juneau

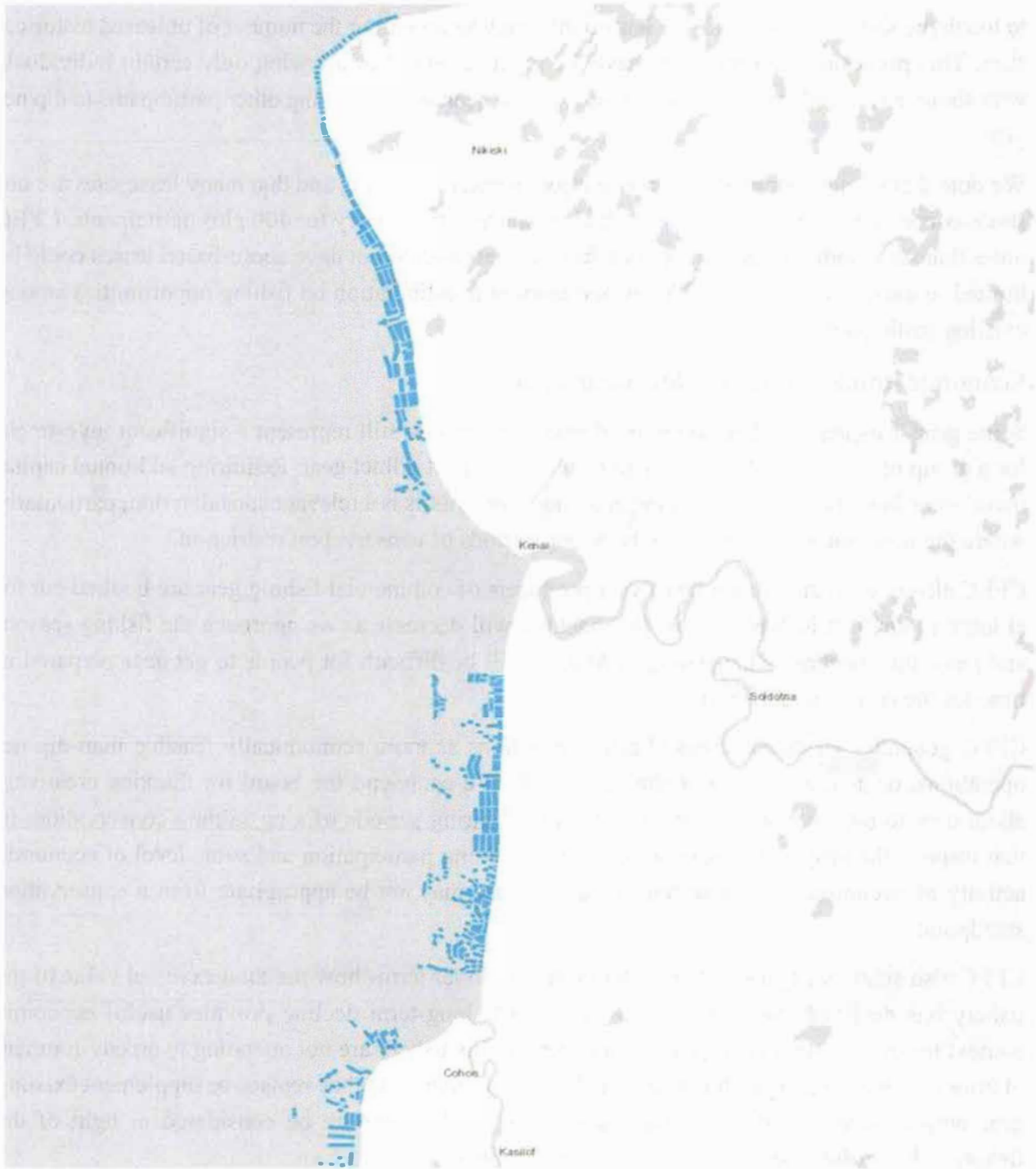


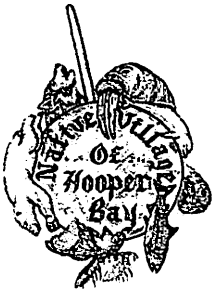
Figure 1: DNR Shore Leases

This proposal also requires that a “set beach seine” be operated from a lease site or a historical staked site. The regulatory definition of “beach seine” requires that a beach seine be operated from the beach. In 2021, CFEC noted that, on average, 432 permits were registered for this area, while

Name: Cameron Schille

Community of Residence: Stanwood, WA

Repeal the amendments to 5 AAC 21.353 adopted through Proposal 186 as amended by RC161 and restore the prior Central District Drift Gillnet Fishery Management Plan unless and until any replacement is adopted through the normal Upper Cook Inlet cycle with full public notice and meaningful opportunity to respond.



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Phone (907) 758-4915 | Fax (907) 758-4066

Marit Carlson-Van Dort, Chair

Alaska Board of Fisheries

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, Alaska 99811-5526

Date: April 29, 2026

Re: Comments and Opposition to Proposals 190 and 191 – Yukon River Salmon Stock of Concern Management Plans

Dear Chair Carlson-Van Dort and Board Members,

On behalf of the Native Village of Hooper Bay, we submit the following comments regarding Proposals 190 and 191. As a coastal Yup'ik community located at the mouth of the Yukon River, our people have depended on salmon for countless generations.

Salmon are not only a source of food, but are central to our cultural identity, traditions, and way of life.

Our community relies heavily on subsistence fishing for nutritional, cultural, and economic well-being. Decisions affecting Yukon River salmon runs directly impact the health and survival of our families and future generations.

Proposals 190 and 191 seek to establish Stock of Concern Management Plans for Yukon River Chinook (king) salmon and fall chum salmon. While we recognize the need for responsible management and conservation, we strongly oppose moving forward with these proposals at this time.



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Our concerns are as follows:

- **Insufficient Data for Decision-Making:**

We are deeply concerned about advancing changes in stock status without updated, comprehensive, and data-driven assessments. Making regulatory decisions based on incomplete or uncertain information risks placing unnecessary and harmful restrictions on subsistence users who are already experiencing hardship.

- **Limited Time for Public Review and Tribal Consultation:**

The current timeline does not allow for meaningful tribal consultation or adequate public engagement. Decisions of this magnitude require sufficient time for communities like Hooper Bay to fully understand, respond to, and participate in the process.

- **Impacts to Subsistence and Community Well-Being:**

For the Native Village of Hooper Bay, subsistence fishing is not optional—it is essential to our food security, cultural continuity, and local economy. Additional restrictions, especially if implemented prematurely, will have serious and lasting consequences for our people.

- **Need for Inclusion of Coastal Tribal Perspectives:**

Management decisions must reflect the voices and realities of coastal communities. Conditions in Hooper Bay differ significantly from upriver areas, and our knowledge and experience must be meaningfully included in both the evaluation and implementation of any management plans.

Given these concerns, the Native Village of Hooper Bay respectfully requests that the Board maintain the current stock status and defer action on Proposals 190 and 191 until




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the next regulatory cycle. This will allow time for improved data collection, meaningful tribal consultation, and a more transparent and inclusive decision-making process. We also emphasize the importance of respecting tribal sovereignty and ensuring that

subsistence users are fully and fairly represented in decisions that directly affect our resources and way of life.

Thank you for your time, your service, and your consideration of our concerns.

Respectfully,


Edgar I. Tall Sr.

Tribal Chief

Native Village of Hooper Bay



(907) 435-7128

842 Fish Dock Road
Homer, Alaska 99603www.silverbayseafoods.com

April 30, 2026

Marit Carlson Van-Dort
Alaska Board of Fisheries
Online Comment Portal Submission

Subject: **Opposition to Proposal 192**

Dear Madam Chair,

Thank you for the opportunity to comment on proposal 192. My name is Janet Keating Carroll and I am the Upper Cook Inlet Fleet Manager for Silver Bay Seafoods in Homer Alaska. I am commenting on behalf of our many U.C.I. Setnet Permit Holders, myself as a lifelong resident of Cook Inlet and Silver Bay Seafoods, a purchaser of commercially caught salmon in Cook Inlet. **We oppose board generated proposal 192 and any modifications that may be made.**

Our opposition to proposal 192 is based on the significant effect that the elimination or replacement of the 04/setnet gear type would have on the 730 small businesses that the setnet gear type represents. Over 80% of those small businesses are owned by Alaska residents. The removal of Setnets/04 gear type and the subsequent replacement of that gear with beach seines could be considered as a highly allocative action by the Board of Fish. A large portion of the permit holders do not have access to shoreside leases that are conducive to beach seining. Local conditions, geography and tidal currents would limit this gear type to a small number of permit holders in favorable locations.

We are also in opposition to proposal 192 because it appears to circumvent the public process that the Board of Fisheries is mandated to represent. By choosing to deliberate proposal 192 as an out of cycle, board generated proposal with a lack of demonstrated need for conservation and inadequate opportunity for public comment it could appear that the board is acting with a causal disregard for process.

Additionally, proposal 192 shows the possibility of further legal issues with CFEC regarding the establishment of a new gear type/fishery that has not undergone limitation proceedings in violation of the Limited Entry Act. As of this moment of my comment submission, there is no CFEC position publicly-available for review on the meeting site.

Please oppose proposal 192 in its current form. The issues in this proposal should be addressed at the regularly scheduled meeting in 2027.

Thank you for your time and consideration.

Sincerely,

Janet Keating Carroll

Silver Bay Seafoods

Upper Cook Inlet Fleet Manager

Janet.Carroll@silverbayseafoods.com



Name: Dyer VanDevere

Community of Residence: Kasilof

Madam Chair and members of the BOF

I'm against the highly allocative out of cycle proposal 186 that didn't even meet the BOF's own criteria. It is strictly allocative with no conservation measures for inriver users.

I am also against Proposal 192 that came out of nowhere around an hour and a half from the end of the March BOF meeting. With no public input.

Between these 2 proposals the public trust in the BOF process has been greatly eroded.

I could go on and on but the issues are being covered very well with all the public input that is PRESENTLY being presented to this May first meeting.

Dyer VanDevere

Name: colby engstrom

I am one of the seated Commercial Fishing representatives for the Kenai ADF&G Advisory Committee

Community of Residence: Point Possession

Good day I am submitting comment on proposal 192 in representation of myself as well as hundreds of Cook Inlet Setnet permit holders and their families. We strongly oppose Proposal 192 in its entirety for a the multitudes of reasons listed below. There are serious shortcomings, oversight and illegality that must be addressed that include but are not limited to the proposal itself, it's failure to meet the objectives of mitigation of mortality of king salmon and the potential impacts to stocks and permit holders.

Legality: Inorder to maintain faith in our fisheries management and enforcement there are many standards that must be met and maintained. Many of those are currently being subverted or outright ignored illegally. This proposal doesn't meet the criteria to be pushed through out of cycle under 5 AAC 39.999, nor has there been an emergency petition set forth under

5 AAC 96.625(F) for out of cycle action. Inadequate public comment period and notification there of has left many unaware that this out of cycle action is being attempted and therefore there's a large public contingent whose voice is not adequately represented. Additionally with the written public comment period only, in combination with the coinciding meeting being scheduled less than 24 hours from the end of the comment period, there is not adequate time for comments to be appropriately reviewed and concerns noted. This makes it apparent to the public that with no oral comment period, coupled with the limited time between the end of comment period and meeting scheduled the following day, on an out of cycle proposal, which can't be physically attended, that public comment is not being appropriately considered or conducted in accordance with the legal parameters. The proposal as written fails to again meet many legal standards. It violates the statutes for compatible gear types. It's proposed actions constitute the creation of a new fishery. It disenfranchises the vast majority of Cook Inlet Setnet permit holders by more than 90%. It violates the Alaska State Constitution by creating additional economic distress to the permit holders in Cook inlet while failing to legally validate actions or mitigate the impact on those the bill essentially bars from participation in the fishery as defined that was bought into under the protections of limited entry. Additionally there is no legal way within the current framework to essentially change a fishery and I believe the CFEC has also commented to this point.

Failure to obtain objective of mitigation of King mortality: The action proposed does nothing to mitigate mortality and the proposed data collection has no tool or process involved to obtain record of delayed mortality which is now highly established by both the Columbia and Frasier River King net test studies. Some showing delayed mortality of up to 90% for a single net exposure and all tests showing significant delayed mortality. Additionally there isn't a single test study done on King mortality when released from a Setnet and therefore nothing to comparatively analyze in relation to a seine. Many Setnet fisherman have had success rolling kings out of Setnets and this study should preempt anything wishing to compare itself. The proposed net length is double that of a Setnet and one end is unescapable unlike a Setnet which the fish can go around either side. Simple math of double the length and 50% the escape routes means a single beach seine is 4x as effective at catching as a single 200ft. Setnet. That's 4x as likely to retain a King instead of it being able to escape. A beach seine harvests the fish in the turbidity zone along the beach line. This is extremely destructive to fish that are to be released, besides the stress, it has significantly lower oxygen while having much higher concentration of silt and sand which impacts the gills ability to filter oxygen as well as depleting the fish of protective slime which greatly contributes to scale loss and in turn the delayed mortality. There has been no consideration of the fact

that if implemented many fish will be repeatedly caught nearly guaranteeing mortality for the very fish we're striving to protect.

Impacts on other permit holders and fish stocks: The 600ft setback again disenfranchises other permit holders, especially those currently utilizing the legal alternative dipnet gear. The current wording only makes it possible for 99 permit holders to possibly utilize this gear type. This proposal has no consideration for the majority of permit holders who either have an offshore site, an area with large rocks or current, don't have a shore lease site, don't have additional personnel/equipment/resources etc. Nobody has addressed the fact that if there is a substantial catch of Kings because of the doubled net length of beach seines with only one exit, that in addition to increased mortality that this directly adversely affects the entire Setnet fishery and would be cause for emergency closures by the ADF&G to prevent additional mortality even though the other traditional gear does not catch the same way. There also needs to be consideration made to the point that a 400ft net anchored on one side has the ability to take out entire schools of fish and could technically be considered a "fish trap" per the current Alaskan legal definition. This ability brings into question the impacts on genetic diversity as well as the numbers which make it to river. These are not things to be toyed with and the consequences could be beyond detrimental ranging on terminal and something with which we cannot recover. We cannot take these chances with a fishery that we're debating these very actions because of its fragility.

This proposal needs to be halted as no single parameter has been legally vetted, its been pushed through illegally and out of designated cycle, it does nothing to achieve its stated function of mitigation of King mortality and all studies currently being held establish it will likely have the opposite of the desired affect at great consequence to our fish stocks, economy and while harming the majority of permit holders financially. I have personally spoken to permit holders from around the inlet and will state for public record that this proposal is only supported by a very small minority contingent of fisherman in one specific area of the inlet. They have maliciously conspired to push this through out of cycle and when the majority of Cook Inlet fisherman are not attentive as its an out of cycle year from when normal business would be conducted. They have conducted meetings in secret specifically excluding those not in support of their personal agenda. We the Setnet permit holders of Cook Inlet implore the board to recognize the shortcomings and illegality of this proposal. Thank you for your consideration in this matter and recognizing that this proposal has serious shortcomings and is not good for the resource, those that strive to sustainably harvest and maintain it, or the public that relies on the management of our precious resources.

Sincerely, Colby Engstrom and the many Setnet permit holders of the Cook Inlet