

Proposal 192 is apparently the **Cook Inlet proposal that never needed a Cook Inlet meeting**: it went from commissioner's permits, to an ACR, to a failed RC, to another statewide detour, and now to a board-generated online meeting with **no oral testimony**, all to revive the same idea that failed **3-3** in 2025 and was later admitted in 2026 that this proposal is not any different than the one that failed. ADF&G says it would **remove set gillnet opportunity** and replace it with beach seines, even though Board members already warned this was a **"fundamental change"** affecting roughly **700 permit holders**, many of whom were not in the room, and even though Member Wood nailed the whole problem: it works for people with beach sites, not for permit holders without sand. Meanwhile, after years of commercial voices calling sport catch-and-release a **"failed recovery strategy for the Kenai"** and a **"de facto catch and release king fishery,"** Proposal 192 now asks everyone to applaud a commercial catch-and-release king and coho fishery because this time the fish are released from a seine, written on a fish ticket, and magically rebranded as conservation. Best of all, the proposal only works above **14,250** large Kenai kings, while the 2026 forecast is **12,718**, so the Board is rushing an out-of-cycle proposal with no oral testimony for a fishery that cannot even operate under its own language. **Same fish, same river, same mortality, same proposal but now opportunity depends on who owns the sand.**

Substitute Language Makes the Process Problem Worse

A Board Member has just said in this meeting, **plenty of public process has happened**, but the Board is now considering substitute language that **materially changes Proposal 192 during an online meeting with no oral testimony**. The original proposal allowed **one beach seine per shore fishery lease site**. The substitute changes that to **one beach seine per S04H permit holder** and removes the clear lease-site/location restriction.

That is a major change. It may sound like it fixes the "only people with beach sites can fish" problem, but it does not. **A CFEC permit is not a beach, not a lease, and not permission to anchor gear on someone else's sand.** If the answer is "go find a friend with beach access," then this proposal is even more allocative. Opportunity now depends on who owns the shore and who do you know that owns the shore.

RCs Asking for More Opportunity Before 192 Even Passes in live-time

Proposal 192 has not even passed yet, and the next RC is already asking to expand beach seine opportunity into August. That alone should stop the Board cold. What are we doing? We are supposed to be operating under a **Kenai River late-run king salmon recovery plan**, not building new commercial opportunity around a stock of concern before the science is done. July 31 was already a bad enough cutoff because Proposal 192 requires commercial live release of coho; August is prime coho migration through this area.

Our own Commissioner knows about Coho Mortality in tide water, [Vincent-Lang Little Susitna study](#), where coho caught and released in the estuary had presumed mortality of **69%**, compared

with **12%** upriver. The same ADF&G review notes that estuary-handled coho easily lost scales, and that scale loss and mucus-coat abrasion are major factors contributing to mortality in released coho.

You have already discussed this as a board in 2025 on coho mortality as the very same proposal failed. The Soldotna AC Failed this 0-13...

So what are we doing? First, we are told this is about conservation and data. Then, before the proposal even passes, the next request is already **more time, more access, and more opportunity**. That is exactly why Proposal 192 should fail. A recovery plan should be judged by whether it helps recover the stock, not by how quickly it can be converted into another commercial opening. **“Live release” of August coho in tidewater is not recovery.**