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ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS
ON AGENDA CHANGE REQUESTS

ALASKA BOARD OF FISHERIES WORK SESSION
ANCHORAGE, ALASKA

October 28–29, 2025

Regional Information Report No. 5J25-03

The following staff comments were prepared by the Alaska Department of Fish and Game (department) for use at the Alaska Board of Fisheries (board) work session meeting October 28–29 in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Acronyms and Abbreviations

The following acronyms and abbreviations, and others approved for the Système International d'Unités (SI), are used without definition in the following reports by the Divisions of Commercial Fisheries, Sport Fish, and Subsistence. All others, including deviations from definitions listed below, are noted in the text at first mention, as well as in the titles or footnotes of tables, and in figures or figure captions.

Weights and measures (metric)

centimeter	cm
deciliter	dL
gram	g
hectare	ha
kilogram	kg
kilometer	km
liter	L
meter	m
milliliter	mL
millimeter	mm

Weights and measures (English)

cubic feet per second	ft^3/s
foot	ft
gallon	gal
inch	in
mile	mi
nautical mile	nmi
ounce	oz
pound	lb
quart	qt
yard	yd

Time and temperature

day	d
degrees Celsius	°C
degrees Fahrenheit	°F
degrees kelvin	K
hour	h
minute	min
second	s

Physics and chemistry

all atomic symbols	
alternating current	AC
ampere	A
calorie	cal
direct current	DC
hertz	Hz
horsepower	hp
hydrogen ion activity (negative log of)	pH
parts per million	ppm
parts per thousand	ppt, ‰
volts	V
watts	W

General

Alaska Administrative Code	AAC
all commonly accepted abbreviations	e.g., Mr., Mrs., AM, PM, etc.
all commonly accepted professional titles	e.g., Dr., Ph.D., R.N., etc.
at	@
compass directions:	
east	E
north	N
south	S
west	W
copyright	©
corporate suffixes:	
Company	Co.
Corporation	Corp.
Incorporated	Inc.
Limited	Ltd.
District of Columbia	D.C.
et alii (and others)	et al.
et cetera (and so forth)	etc.
exempli gratia (for example)	e.g.
Federal Information Code	FIC
id est (that is)	i.e.
latitude or longitude	lat or long
monetary symbols (U.S.)	$, ¢
months (tables and figures): first three letters	Jan,...,Dec
registered trademark	®
trademark	™
United States (adjective)	U.S.
United States of America (noun)	USA
U.S.C.	United States Code
U.S. state	use two-letter abbreviations (e.g., AK, WA)

Acronyms

Acceptable Biological Catch	ABC
Alaska Board of Fisheries	board
Alaska Department of Fish and Game	department /ADF&G
Amount Necessary for Subsistence	ANS
Alaska Wildlife Troopers	AWT
Biological Escapement Goal	BEG
Central Gulf of Alaska	CGOA
Coded Wire Tag	CWT
Commercial Fisheries Entry Commission	CFEC
Cook Inlet Aquaculture Association	CIAA
Customary and Traditional	C&T
Department of Natural Resources	DNR
Demersal Shelf Rockfish	DSR
Emergency Order	EO
Guideline Harvest Level	GHL
Gulf of Alaska	GOA
Global Positioning System	GPS
Individual Fishing Quota	IFQ
Local Area Management Plan	LAMP
Lower Cook Inlet	LCI
Mean Low Water	MLW
Mean Lower Low Water	MLLW
No Data	ND
National Marine Fisheries Service	NMFS
National Oceanic and Atmospheric Administration	NOAA
Nick Dudiak Fishing Lagoon	NDFL
North Pacific Fishery Management Council	NPFMC
Optimum Escapement Goal	OEG
Pelagic Shelf Rockfish	PSR
Prince William Sound	PWS
Prior Notice of Landing	PNOL
Private Nonprofit Salmon Hatchery	PNP
River Mile	RM
Special Harvest Area	SHA
Sustainable Escapement Goal	SEG
Trail Lakes Hatchery	TLH
Upper Cook Inlet	UCI
Western Gulf of Alaska	WGOA

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ALASKA BOARD OF FISHERIES WORK SESSION ANCHORAGE, ALASKA

October 28–29

by
Alaska Department of Fish and Game

Alaska Department of Fish and Game
Division of Sport Fish, Research and Technical Services
333 Raspberry Road, Anchorage, Alaska, 99518-1565

September 2025

ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on agenda change requests. These comments were prepared by the department for use at the Alaska Board of Fisheries (board) meeting, October 28–29, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change, as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Keywords: Alaska Board of Fisheries (board), Alaska Department of Fish and Game (department), staff comments, regulatory proposals, fisheries, work session, agenda change request (ACR), salmon, Pacific cod, groundfish, management, management plan, inriver, subsistence, personal use, sport, commercial fisheries, biological escapement goal (BEG), sustainable escapement goal (SEG), optimal escapement goal (OEG), guideline harvest level (GHL)

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to delay the opening of the Copper River District commercial salmon fishery to June 1.

PRESENT SITUATION: In December 2024, the Alaska Board of Fisheries adopted a regulation changing the opening of the Copper River District commercial fishery from May 15 to May 22.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No.
b) **Does the agenda change request correct an error in regulation?** No.
c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No.

ADDITIONAL INFORMATION: The Alaska Board of Fisheries changed the opening of the Copper River District commercial fishery from May 15 to May 22 starting in 2025 to allow more early-run salmon, particularly king salmon, to reach the upper sections of the river. This decision aimed to increase fish passage and support upriver subsistence needs. The later opening date was part of a broader strategy involving the adjustment of fishing regulations in the upper Copper River, including changes to personal use and sport fishing regulations, to better align with current salmon abundance and migration patterns.

Over the past 20 years, Copper River king salmon abundance has declined during a concurrent statewide pattern of reduced productivity. The department has responded by implementing commercial fishing restrictions in the Copper River District to reduce harvest. By regulation (5 AAC 24.361), during the statistical weeks 20 and 21, the commissioner may not open more than one 12-hour fishing period within the inside closure area. The inside-waters closure strategy was developed by the department based on data showing that most of the king salmon are harvested in the shallow nearshore waters. In practice, the inside waters have not been opened at all during those early weeks, even though it is allowed by regulation. To further reduce king salmon harvest, the department is using discretionary authority to expand the time and area of inside waters closure beyond what is in regulation. Expanded inside waters closures have frequently been implemented throughout the entire king salmon run. In 2025, an expanded inside waters closure was implemented until the king salmon run was 96% complete. Additionally, closed waters were expanded offshore of the barrier islands for 5 fishing periods during the historic peak of king salmon run timing.

Currently, king salmon escapement is estimated by subtracting the estimated inriver harvest from the Native Village of Eyak's mark–recapture estimate of abundance. However, in recent years, the reliability of the mark–recapture method has diminished due to operational challenges. Since 2018, the Miles Lake Sonar Project has also provided inriver abundance estimates of large salmon, which are assumed to be king salmon. These sonar-based estimates often differ from the mark–recapture estimates used to assess the escapement goal. In both 2024 and 2025, the mark–recapture project suffered challenging operational issues resulting in reduced reliability. For example, in 2024, the sonar apportionment estimate was 30,728 king salmon, compared to a mark–recapture estimate of 21,069, with a 95% confidence interval ranging from 9,340 to 32,797 fish. The 2025 mark–recapture estimate is expected to be similarly low and uncertain. Given these operational issues, the department is more confident in the sonar-based estimate than the mark–recapture-based estimate.

PROPOSED BY: Mike Tinker.

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to close the inside waters portion of the Copper River District as defined in 5 AAC 24.350 (1)(B).

PRESENT SITUATION: Inside waters are managed under the *Copper River King Salmon Management Plan,* which limits the number of commercial openings inside of the barrier islands (inside waters) to no more than one 12-hour fishing period during statistical weeks 20 and 21.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No.

b) **Does the agenda change request correct an error in regulation?** No.

c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No.

ADDITIONAL INFORMATION: Over the past 20 years, Copper River king salmon abundance has declined as part of a statewide pattern of reduced productivity. The department has responded by implementing commercial fishing restrictions in the Copper River District to reduce harvest. By regulation (5 AAC 24.361), during the statistical weeks 20 and 21, the commissioner may not open more than one 12-hour fishing period within the inside closure area. The inside-waters closure strategy was developed by the department based on data showing that most of the king salmon are harvested in the shallow nearshore waters. In practice, the inside waters have not been opened at all during those early weeks, despite being allowed by the regulation. To further reduce king salmon harvest, the department is using discretionary authority to expand the time and area of inside waters closure beyond what is in regulations. Expanded inside waters closures have frequently been implemented throughout the entire king salmon run timing. In 2025, an expanded inside waters closure was implemented until the king salmon run was 96% complete. Additionally, closed waters were expanded offshore of the barrier islands for 5 fishing periods during the historic peak of king salmon run timing.

The department manages Copper River sockeye and king salmon runs to meet an inriver goal that includes fish allocated to upriver subsistence, personal use, and sport harvest as well as fish to meet sustainable escapement goals (SEGs) and hatchery requirements. For the purposes of managing directed fisheries, the department considers the best available information regarding harvest, run timing, environmental conditions, age composition, and escapement. Escapement is estimated by subtracting inriver harvest estimates from Miles Lake sonar fish counts.

Currently, king salmon escapement is estimated by subtracting the estimated inriver harvest from the Native Village of Eyak's mark–recapture point estimate. However, in recent years, the reliability of the mark–recapture method has diminished due to operational challenges. Since 2018, the Miles Lake Sonar Project has also provided inriver abundance estimates of large salmon, which are assumed to be king salmon. These sonar-based estimates often differ from the mark–recapture estimates used to assess the escapement goal. In both 2024 and 2025, the mark–recapture project suffered challenging operational issues resulting in wide confidence intervals and reduced statistical reliability. For example, in 2024, the sonar apportionment estimate was 30,728 king salmon, compared to a mark–recapture estimate of 21,069, with a 95% confidence interval ranging from 9,340 to 32,797 fish. The 2025 mark–recapture estimate is expected to be similarly low and

uncertain. Given these operational issues, the Department is more confident in the sonar-based estimate than the mark–recapture-based estimate.

PROPOSED BY: Mike Tinker.

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to establish a closed waters area from May 22 to June 30 that extends offshore of the Copper River barrier islands.

PRESENT SITUATION: The inside closure area is defined in 5 AAC 24.350 using a line along the Copper River barrier islands.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No

b) **Does the agenda change request correct an error in regulation?** No

c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No

ADDITIONAL INFORMATION: Over the past 20 years, Copper River king salmon abundance has declined as part of a statewide pattern of reduced productivity. The department has responded by implementing commercial fishing restrictions in the Copper River District to reduce harvest. By regulation (5 AAC 24.361), during the statistical weeks 20 and 21, the commissioner may not open more than one 12-hour fishing period within the inside closure area. The inside-waters closure strategy was developed by the department based on data showing that most of the king salmon are harvested in the shallow nearshore waters. In practice the inside waters have not been opened at all during those early weeks even though it is allowed by that regulation. To further reduce king salmon harvest, the department is using discretionary authority to expand the time and area of inside waters closure beyond what is in regulations. Expanded inside waters closures have frequently been implemented throughout the entire king salmon run timing. In 2025, an expanded inside waters closure was implemented until the king salmon run was 96% complete. Additionally, closed waters were expanded offshore of the barrier islands for 5 fishing periods during the historic peak of king salmon run timing.

Currently, king salmon escapement is estimated by subtracting the estimated inriver harvest from the Native Village of Eyak's mark–recapture point estimate. However, in recent years, the reliability of the mark–recapture method has diminished due to operational challenges. Since 2018, the Miles Lake Sonar Project has also provided inriver abundance estimates of large salmon, which are assumed to be king salmon. These sonar-based estimates often differ from the mark–recapture estimates used to assess the escapement goal. In both 2024 and 2025, the mark–recapture project suffered challenging operational issues resulting in wide confidence intervals and reduced statistical reliability. For example, in 2024, the sonar apportionment estimate was 30,728 king salmon, compared to a mark–recapture estimate of 21,069, with a 95% confidence interval ranging from 9,340 to 32,797 fish. The 2025 mark–recapture estimate is expected to be similarly low and uncertain. Given these operational issues, the department is more confident in the sonar-based estimate than the mark–recapture-based estimate.

PROPOSED BY: Andrew Couch.

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to adopt an optimal escapement goal (OEG) for Copper River sockeye salmon (5 AAC 24.360) based on the 2024 Miles Lake sonar management objectives for May and June.

PRESENT SITUATION: The current sustainable escapement goal (SEG) range for the upper Copper River is 360,000–750,000 sockeye salmon and 21,000–31,000 king salmon. To achieve these goals, the department manages for an inriver goal that meets sustainable escapement goals (SEGs) and hatchery requirements and also includes fish allocated to upriver subsistence, personal use, and sport harvest. Escapement is estimated by subtracting inriver harvest estimates from Miles Lake sonar counts.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No

b) **Does the agenda change request correct an error in regulation?** No

c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No

ADDITIONAL INFORMATION: The department manages for a daily salmon passage objective that is the number of fish needed to pass the Miles Lake sonar to meet the inriver goal based on historical run timing. The inriver goal is calculated annually and consists of 7 components: the lower bound of the sockeye salmon spawning escapement goal, escapement of 17,500 other salmon, upriver allocations for subsistence, personal use, and sport users, and hatchery broodstock and surplus (5 AAC 24.360). The last time the upriver sockeye salmon goal was not achieved was 1980.

The department has recognized for some time that Copper River sockeye salmon run timing has shifted. The previous run timing curve, which was developed in the 1990s, no longer reflected current run timing. Starting in 2023, the department began biometric assessment of run timing using current escapement data and additional sources of data that were not available during the original model's development. This updated analysis was finalized in early 2025. The updated curve is based on daily sonar passage from 1978–2024, combined with commercial harvest data that were lagged to adjust for the timing difference between district harvest and sonar passage. Additional refinement included the removal of Copper River Delta and non–Copper River stocks using genetic stock identification. In contrast, the previous method relied solely on lagged harvest data from 1985–1999, without incorporating sonar data or removing stocks spawning below the sonar.

The season starts in the Copper River District before the Miles Lake sonar counter is operational, and early-season management is based on commercial harvest as well as the forecast and environmental conditions. Also relevant is the regulatory change of the first commercial opening from May 15 to May 22. It is common for the first Copper River commercial openings to occur before significant sonar passage has started, especially in years with cold spring conditions that slow migration. Sonar becomes more informative later in the run. Thus, the updated run timing curve has not changed how early-season commercial openings are scheduled and the first two 2025

commercial openings would have occurred regardless of the timing curve used and associated management objectives.

By regulation (5 AAC 24.361), during statistical weeks 20 and 21, the commissioner may not open more than one 12-hour fishing period within the inside closure area. The inside-waters closure strategy was developed by the department based on data showing that most king salmon are harvested in shallow nearshore waters. To further reduce king salmon harvest, the department is using its discretionary authority to expand the time and area of inside waters closure beyond what is required in regulation. Expanded time and area closures have been implemented through the entire king salmon run timing in years of low abundance. The department has kept these waters closed by emergency order until the king salmon run timing is over 95% complete in some years. At that time, the inside waters are opened to harvest surplus sockeye salmon. It is also at this point that upriver passage is typically meeting or exceeding daily inriver objectives and lower river sockeye salmon (delta stocks) enter the Copper River District. These delta stocks are more shore-oriented, and fishing the inside waters increases harvest efficiency.

The current escapement goal for sockeye salmon remains the best estimate of maximum sustained yield for this stock. The department does not intend to reassess this goal until the next regular cycle. Development of an OEG has allocative implications that are best addressed during the regular board cycle.

PROPOSED BY: Andy Couch.

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to reduce fishing opportunities for drift gillnet commercial fishing in Drift Gillnet Area 1 from July 9 through July 31 at all Kenai River late-run sockeye salmon run sizes.

PRESENT SITUATION: The Central District Drift gillnet fishery in State of Alaska waters is regulated under the *Central District Drift Gillnet Fishery Management Plan* (CDDGFMP,5 AAC 21.353). Drift gillnet Area 1 (Figure 1) may be opened on regular Monday and Thursday periods, once or twice per a week, depending upon date and Kenai River late-run sockeye salmon run size. One additional Drift Gillnet Area 1 period may be opened in early July if the preseason Kenai River late-run sockeye salmon run size is forecasted to be greater than 2.3 million fish.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No.
b) Does the agenda change request correct an error in regulation? No.
c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No.

ADDITIONAL INFORMATION: The CDDGFMP directs the department to manage the mixed stock drift gillnet fishery to primarily harvest Kenai and Kasilof River sockeye salmon stocks while also minimizing harvest of Northern District coho, late-run Kenai River king, and Kenai River coho salmon stocks. This is implemented through time and area restrictions that are based on preseason forecast and inseason run strength information sources.

Beginning in 2024, the Exclusive Economic Zone (EEZ) of UCI (Figure 1) was managed directly by the National Marine Fisheries Service under a federal fisheries management plan (FFMP) that mirrored many elements of the CDDGFMP that had previously regulated this area. The FFMP differs notably in that the drift gillnet fishery is managed to meet total allowable catches (TAC) by species, a single permit may fish up to 200 fathoms of gear, and a permit holder may not fish in the federal fishery and SOA fishery on the same day. No species-specific TAC was reached in the 2024 or 2025 fisheries.

In recent years, the combined regulatory restrictions and large sockeye salmon returns have contributed to some of the largest escapements on record. Kenai River late-run sockeye salmon have exceeded inriver run goals (IRG) the last 3-years with the 2025 preliminary sonar passage estimate of approximately 4.2 million fish being the largest passage observed and exceeded the upper tier IRG of 1.6 million fish. Kasilof River sockeye salmon have exceeded the sustainable escapement goal (SEG, 140,000–320,000 fish) in each of the previous eight years with the 2025 preliminary passage of 1.2 million fish being the largest observed sonar passage.

Both the Deshka and Little Susitna River coho salmon weirs have experienced flooding or early ending of the project due to funding. Because of that, those counts are considered minimum or incomplete estimate of coho salmon inriver abundance. Deshka River coho salmon weir counts have been incomplete each year since 2020. Little Susitna River coho salmon weir counts have been incomplete each year since 2022. Fall weather and high water make consistent operation of these weirs difficult. Despite incomplete counts the most recent seasons have been generally categorized as low abundance for coho salmon in the Deshka and Little Susitna rivers.

PROPOSED BY: Andrew Couch.

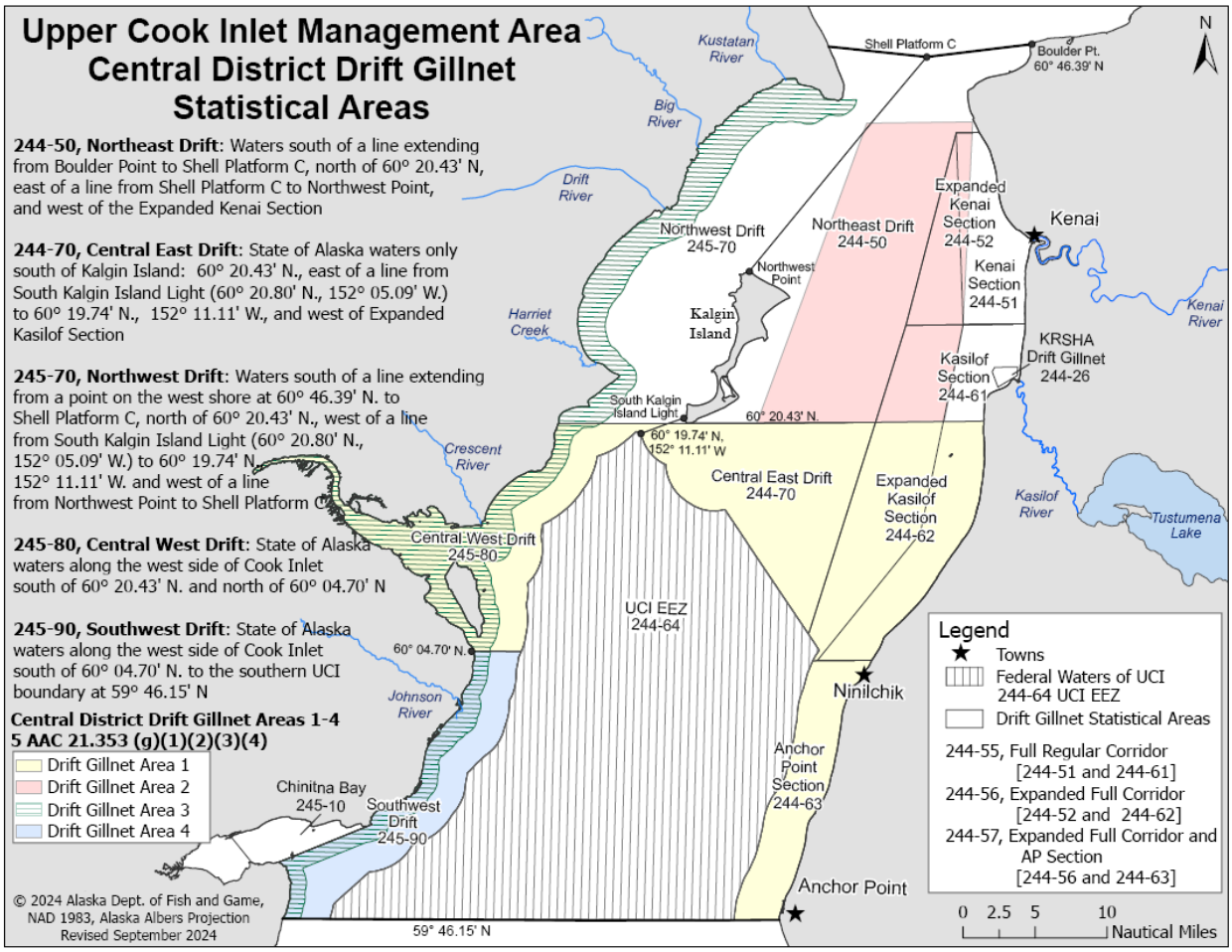

Figure 1.–Map of Central District drift gillnet commercial fishery drift gillnet areas, corridors, and statistical areas, 2025.

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to establish a series of paired management actions between the Little Susitna River inriver sport fishery and the Northern District set gillnet commercial fishery.

PRESENT SITUATION: The Northern District set gillnet fishery is managed under the guidance of the *Northern District Salmon Management Plan* (NDSMP, 5 AAC 21.358). There are no paired restrictions between the sport and commercial fisheries under the NDSMP. The commercial set gillnet fishery is managed using inseason indicators of abundance and restricted if necessary with gear, time, and/or area reductions. The sport fishery is managed using the same inseason information with the additional authority to reduce bag limits and implement catch-and-release fishing.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No.
b) **Does the agenda change request correct an error in regulation?** No.
c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No.

ADDITIONAL INFORMATION: From 2023 through 2025, the department has implemented inseason restrictions to both the sport and commercial fisheries to reduce the harvest of coho salmon due to assumed low abundance. In these years, both the Deshka and Little Susitna River coho salmon escapement assessments experienced flooding which hindered weir operations from fully enumerating the escapement. This has resulted in estimated coho salmon counts that are considered a minimum or incomplete. Despite minimum or incomplete counts, based on catch and harvest levels and anecdotal reports, the most recent years have been generally categorized as low abundance for coho salmon in the Deshka and Little Susitna Rivers.

PROPOSED BY: Andrew Couch.

ACR 7 – Prohibit the sport fishing technique of "flossing" and the use of bare hooks in Ship Creek (5 AAC 59.122 (a)(14)).

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to prohibit the fishing technique of flossing and the use of a bare hook in Ship Creek.

PRESENT SITUATION: In Ship Creek, there are no special gear restrictions; therefore, the fishery is managed under statewide gear regulations, which include allowing bait and multiple hooks. Statewide definitions (5 AAC 75.995(a)(1)(A)) also allow bare single hooks. Excluding snagging, no fishing technique is currently prohibited in Ship Creek.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No.
b) **Does the agenda change request correct an error in regulation?** No.
c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No.

ADDITIONAL INFORMATION: Ship Creek sport fisheries for king and coho salmon are enhanced and are managed inseason by Emergency Order in order to meet broodstock needs or to provide more harvest opportunity. Broodstock goals vary annually because Ship Creek king and coho salmon are used to enhance other fisheries. However, broodstock goals specific to Ship Creek have always been achieved, and currently, there are no conservation concerns for king or coho salmon in Ship Creek.

PROPOSED BY: Roger Peterson.

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

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to close the Tsiu River to commercial fishing and restrict commercial fishing in the Kaliakh River.

PRESENT SITUATION: Historically, commercial salmon fishing occurred in both the Tsiu and Kaliakh Rivers. Commercial fishing effort has not occurred in the Tsiu River since 2021 due to the lack of availability of an air carrier that could cost effectively transport commercial harvest. From 1985 through 2021, commercial coho salmon harvest from the Tsiu River averaged over 36,000 fish. The Kaliakh River has historically received less consistent commercial effort and harvest but since 2018 it has been consistently fished with an average harvest of 8,900 coho salmon.

The mouth of the Kaliakh River steadily progressed northwest until it overtook the Tsiu River in 2025, effectively making the Tsiu River a tributary of the Kaliakh River. Within regulation the Tsiu River has more restrictive commercial fishing opportunity than the Kaliakh River with one less day per week open to commercial fishing (5 AAC 30.320(1)), set gillnets may not exceed 15 fathoms in length rather than 25 fathoms (5 AAC 30.331 (2)(A)), and set gillnets may not obstruct more than 1/2 of the waterway rather than 2/3 of the waterway (5 AAC 30.331(b)).

For most of the 2025 season, the department used emergency order authority to restrict commercial fishing area at the confluence of the Tsiu and Kaliakh Rivers. No commercial fishing occurred within the Tsiu River and the 2025 harvest is expected to be around 20,000 fish, likely comprised of both Tsiu and Kaliakh River coho salmon.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No. The department attempts to monitor coho salmon escapement in the Tsiu River on an annual basis and the sustainable escapement goal of 10,000 to 29,000 fish has been met most years . In the 28 years from 1997 to 2024, escapement was achieved in 21 years; escapement in the remaining 7 years is unknown, as either no surveys or no peak surveys were flown due to poor weather or lack of an air carrier. On September 3, 2025, the department observed 13,800 coho salmon in the Tsiu River, which is within the escapement goal range. This observation was made early in the run and the peak count is expected to be higher.
b) **Does the agenda change request correct an error in regulation?** No.
c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No. The course of the Kaliakh River has changed to intercept the Tsui River but the department has used emergency order authority to provide commercial harvest opportunity while managing for sustainable coho salmon runs to both the Kaliakh and Tsiu Rivers.

ADDITIONAL INFORMATION: The Yakataga area is a very geographically dynamic area where changes in river course occur often. The department uses emergency order authority to adjust to these changes. The merging of the Kaliakh and Tsiu Rivers may not last as the Kaliakh River could breach the berm and enter the ocean many miles away from the Tsiu River as it once did.

PROPOSED BY: Dan Ernhart.

ACR 9 – Prohibit carrying other groundfish gear types on vessels registered for the Pacific cod jig fishery in the Kodiak Management Area (5 AAC 28.430).

WHAT THE AGENDA CHANGE REQUEST SEEKS TO CHANGE: This ACR seeks to restrict vessels to only carrying mechanical jigging and hand troll gear on board while registered for the Kodiak Area state-waters Pacific cod jig gear fishery.

PRESENT SITUATION: The Kodiak Area state-waters Pacific cod jig gear fishery is an open access fishery. The fishery opens on January 1 and closes when the jig gear guideline harvest level (GHL) allocation has been harvested or on December 31 if the jig gear GHL is not fully harvested. Mechanical jigging machines and hand troll gear are the only legal gear types. Vessels are restricted to operating no more than 6 mechanical jigging machines. Each jigging machine may have no more than 30 hooks attached. Additionally, jig gear vessels are limited to having no more than 500 hooks, in aggregate, on board the vessel. There is no vessel size limit for jig gear vessels in the Kodiak Area. Other fishing equipment or gear types may be onboard a vessel participating in the state-waters Pacific cod jig gear fishery but only jig or hand troll gear may be used to harvest Pacific cod while registered for the fishery.

The GHL for the Kodiak Area state-waters Pacific cod season is based on 12.5% of the Central Gulf of Alaska Acceptable Biological Catch for Pacific cod. By regulation, 50% of the GHL is allocated to pot gear vessels and 50% is allocated to jig gear vessels. For the 2025 season, each gear type was allocated 2.83 million pounds. The 2025 Kodiak Area state-waters Pacific cod jig gear fishery opened on January 1 and closed on April 4 when the jig gear GHL allocation was achieved; 63 jig gear vessels made landings during the 2025 season.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

a) **Is there a fishery conservation purpose or reason?** No.
b) **Does the agenda change request correct an error in regulation?** No.
c) **Does the agenda change request address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted?** No.

ADDITIONAL INFORMATION: Since inception of Kodiak Area state-waters commercial Pacific cod fishery in 1997, the jig gear GHL allocation has been fully harvested 12 out of 29 seasons. Jig gear seasons frequently remain open most of the year, with most harvest occurring from March through May. From 2021 through 2025, an average of 42 jig gear vessels participated in the fishery annually. Jig gear GHLs are fully harvested during years when Pacific cod abundance is relatively high and fish are found relatively close to the port of Kodiak.

There are long standing concerns about vessels operating illegal gear types (i.e., longline, slinky pot, etc.) during the Kodiak Area state-waters Pacific cod jig gear fishery . As early as 2004, proposals nearly identical to this ACR were submitted to the board (Proposals 74 and 75; Kodiak Finfish Meeting; January 7–10, 2005). Those proposals, which were intended to disallow vessels from carrying longline gear while participating in the jig gear fishery, resulted in the 500-hook aggregate limit which is still in regulation (5 AAC 28.430(g)).

PROPOSED BY: Darius Kasprzak – Alaska Jig Association.