

ACR 1

Delay opening of the Copper River District commercial salmon fishery to June 1 (5 AAC 24.310).

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

5 AAC 24.310(a) and/or 5 AAC 24.361(b)

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

The problem is chinook salmon escapement into the Copper River and conservation measures to increase the numbers escaping.

The Board changed and added to the regulations that affect the fishing schedules for both commercial fishermen and upriver fishermen, especially personal use fishers. Evidence from the department and those providing input recognized that over time the salmon were not beginning their upriver movement until later than historical timing. The Board set a hard “early opening” date for the commercial fishery in the Copper River district. The goal for opening later (May 22) was selected to allow more time for (especially) chinook salmon to leave salt water and start upstream. Following that date the 2025 startup of the commercial season still resulted in a harvest of nearly 2,000 chinook. With an objective of 21,000 - 31,000 for the spawning escapement that early two session harvest was over 30% of the total caught in the commercial season. Estimates for the escapement were very close to 21,000 the lower end of the escapement range. Not all of those early fish were Copper River genetics because they the district has a mix of sources for the chinook. Late in the chinook commercial season the managers opened the “inside the barrier islands” portion of the district and another 570 chinook were harvested there. Moving the opening date back probably helped chinook escapement but it is a case of the right concept not set far enough. The commercial harvest of other salmon exceeded the forecast and was over 800,000 fish by late July. In the chinook conservation discussion the personal use Alaskans volunteered to limit harvest until July 1, giving up 70% of their normal season.

Everyone associated with the Copper River salmon fishery was aware that fish were present in good numbers at the start of the season and harvests in the district increased as the season progressed. However, because the early number of chinook in river was low, estimated by traditional means, upriver restrictions were put on in early June. With all user groups from commercial to sport fishing depending on the sonar counts restrictions stayed in place. With excellent early total salmon counts, the sonar data did not give the managers enough run information to delineate chinook numbers. As usual chinook numbers drove the management strategy. Looking back on the season the search for 21,000 chinook drove the management for a two million plus total return.

The commercial harvest of chinook in 2025 was very close to the total harvested in 2024. An important statistic because it's the only early harvest data. Personal use and subsistence fishers harvest reporting isn't available during the chinook season. Beginning in June the department began tracking the indices used for estimating chinook run strength. Eyak mark and recapture fishwheels, fish timing from early subsistence harvest and later anecdotal data from the personal

use fishers. Although the department gave some estimates from the size data from the sonar counts there is still no correlation to allow a comparison with previous year's estimates.

The drainage wide salmon harvest will not have a chance to stabilize until higher numbers of chinook enter the river. The Copper River chinook may be in better shape than many other Alaska waters but squeaking into the lower end of the escapement goal is high risk. Management under the changed regulations went in the right direction but not far enough.

Sport fishers in the Copper River system were basically shut down early, personal use families were never allowed to harvest a chinook, subsistence families caught some chinook but not as many as usual for effort vs harvest. (The Board should ask for a comparison between 2025 subsistence chinook and 2024, 2023 subsistence numbers. (Subsistence fishers are required to report by dates and species).

Moving the early opening date back more would have reduced the commercial harvest by 2,000 chinook. Those fish in river could have tempered or eliminated the restrictions on other users and moved the total escapement higher in the objective range. The old assumptions on upriver harvest need to be updated. Sport fishing harvest is only reported in the statewide survey. Observations by long term residents and those involved in the sports fishery (local fishers, service providers, guides, etc.) suggest that participation is significantly down. Uncertainty on dates, limits and methods has reduced the participation in recent years. Another factor to consider is that most sports fishers in this region are Alaska residents. All personal use fishers are Alaska residents and all subsistence fishers are Alaska residents.

WHAT SOLUTION DO YOU PREFER? Move the early opening date to June 1

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

for a fishery conservation purpose or reason: With the new regulation for opening in place and using the estimating means available we may have met the lower end of the escapement objective. Conservation of the chinook salmon is an important statewide priority. All of the Copper River chinook user groups are on board with maintaining and hopefully improving that segment of the salmon fishery. More change is needed to reduce risk to chinook numbers.

to correct an error in regulation: Not applicable

to correct an effect on a fishery that was unforeseen when a regulation was adopted: Selecting a hard opening date for the commercial fishery was a "best guess" approach to get more chinook into the river. The department knew that the salmon were returning later. The 2025 forecast daily escapement estimates were reduced from previous years. The overall seasonal estimate predicted a higher than average run and counts showed a higher than forecast run.

The 2025 harvest reports show that a slightly later commercial opening date would help the chinook numbers without changing harvested salmon by less than 1%.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE? Chinook salmon numbers are falling or flat for nearly all Alaska waters. This trend creates high risk to management guidelines. Chinook conservation needs attention out of cycle to avoid emergency situations. If the lower escapement goal is not met emergency changes would be necessary in all user groups. The Copper River district commercial fishermen enjoy an early season economic base. An emergency delay until chinook are in river would be a disaster for their fishery.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. There is no specific allocation for chinook I. The Copper River fishery. In salt water there are mixed stocks of salmon. There are escapement objectives for chinook and sockeye. Harvest statistics show the distribution of harvest by species because of the reporting requirements. All discussion in the general management guidelines, except for the upriver chinook management plan, are for "salmon".

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE. This proposal would change the commercial harvest of chinook salmon. It would delay the beginning of the sockeye harvest. As with any hard opening date it would intentionally reduce the early harvest. Other user groups could benefit from a later opening date but there is a management plan in place to assist their fisheries with chinook conservation.

STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR. My family are subsistence fishermen and sports fishermen

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

SUBMITTED BY: Mike Tinker

ACR 2

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

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

5 AAC 24.350 or 5 AAC 24.361

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

The Copper River salmon management plan allows the department discretion on opening commercial fishing within the “inside waters” of the river mouth’s barrier islands. The area is closed when there is risk of harvesting chinook salmon. Absent a milling study these fish in inside waters are believed to be Copper River spawning stock. The chinook escapement has been below or has reached the lower end of the escapement goal range for years.

In the 2025 season commercial fishermen were allowed into the inside waters for several periods late in the chinook “season”. Nearly 600 chinook were harvested. Statewide Alaska’s chinook stocks are in low numbers and many are stocks of concern. The additional harvest was 10% of the commercial harvest of chinook for the year. Those fish should have been allowed to escape into the river.

From the opening in late May the 2025 harvests and estimating measures showed low chinook return. Data from sonar upriver, mark and recapture efforts and tracking upriver presence caused the department to significantly restrict in river harvest. In early June sport fishing was restricted then virtually eliminated, personal use families were never permitted to harvest even one chinook salmon for the season, subsistence families caught some chinook in the early run but nowhere near they’re normal harvest. The low numbers of chinook have resulted in restrictions in most of the last 5 years. Twice subsistence fishermen were operationally restricted. The upriver chinook management plan needs to be revised but that can be done in cycle.

When upriver harvest was restricted and indicators showing the escapement was unlikely to reach the lower end of the management range, upriver fishermen assumed the commercial fishery would be managed for maximum conservation of chinook salmon.

There was no problem in 2025 with the total salmon escapement. The forecast for the run was over two million and the daily counts ran ahead of the forecast by 25% to 35% for much of the year. The commercial harvest was higher than forecast also. Closing the inside waters is a chinook conservation action.

The inside waters should never have been opened in 2025. They should not be opened until chinook numbers improve to at least mid range of the goal has been achieved.

WHAT SOLUTION DO YOU PREFER?

Change the management plan to close the inside waters. The geographic area closed for the beginning and most of the 2025 season should be defined as the “closed area”.

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

for a fishery conservation purpose or reason: The need for significant restrictions to Alaskans fishing upriver shows the need for every possible conservation measure to help chinook escape in sustaining numbers. The requested change can make a difference in getting those fish into the river.

to correct an error in regulation: Not applicable

to correct an effect on a fishery that was unforeseen when a regulation was adopted: The department meant well in keeping the authority to open the inside waters. Opening for commercial harvest there for several periods when the minimum escapement goal was not expected to be met and restrictions were still in place for other user groups did not meet the conservation intended. The “discretion” should be removed.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Concern over chinook, including the Copper River fish, is a highest priority for the department and for Alaskans. This change does not adversely affect anyone. Out of cycle consideration of this proposal will add emphasis to chinook conservation efforts.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

There is no allocation for a single species within the Copper River district management plan. Only chinook and sockeye have escapement goals and forecasts. The department has been keeping the inside waters closed while chinook are present for years.

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

It could be considered “allocative” to leave the regulation unchanged. Only one user group fishes the inside waters.

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

My family are upriver subsistence and sport fishers.

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

Requested at previous PWC/CR BOF cycles but no action taken.

SUBMITTED 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).

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

Alaska Administrative Code Number 5 AAC: 24.350 Closed Waters and 5AAC 21.361 (b).
Copper River King Salmon Management Plan

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Conservation of Copper River drainage Chinook Salmon stocks should provide a higher degree of certainty for attaining the midpoint level of the 21,000 - 31,000 sustainable escapement goal,(SEG) on an annual basis, thereby providing all user groups with reasonable harvest opportunities, spread throughout the entire season, and minimizing the need for inseason harvest restrictions and / or closures caused by early season over harvest of this highly valued public resource.

WHAT SOLUTION DO YOU PREFER? Establish closed waters to commercial fishing within the Copper River District from May 21 — June 30 (to match what ADF&G used and displayed in its 2025 Prince William Sound Advisory Announcement #5 and #6). **From May 22 — June 30, the Copper River District, excludes waters north of a line from 60° 11.14' N., 144° 36.03' W. to 60° 12.34' N., 145° 09.97' W. to 60° 17.88' N., 145° 38.40' W. and east of a line from 60° 17.88' N., 145° 38.40' W. to 60° 22.87' N., 145° 33.50' W. Little Softuk 60* 13.6 ' N. Latitude / 144*41.38' W Longitude**

Amendment to remove 5 AAC 21.361 (b);

[(b) IN THE COMMERCIAL FISHERY, DURING THE STATISTICAL WEEKS 20 AND 21, THE COMMISSIONER MAY NOT OPEN MORE THAN ONE 12-HOUR FISHING PERIOD WITHIN THE INSIDE CLOSURE AREA OF THE COPPER RIVER DISTRICT DESCRIBED IN 5 AAC 24.350(1) (B).]

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

for a fishery conservation purpose or reason: for a fishery conservation purpose or reason: Copper River Chinook Salmon are already on a near chronic course of failing to meet the SEG — If the 2025 escapement estimate comes in below the SEG (as appears likely) it will mark failure to attain the SEG in 4 of the 6 previous years. If nothing is done to address this issue before the next Upper Copper River / Prince William Sound board cycle Copper River Chinook Salmon could likely be designated as a Stock of Management Concern and the department / BOF tasked with developing an action plan to address unsustainable Copper River Chinook Salmon management during the BOF meeting of 2027 / 2028. In addition, excessive commercial Chinook Salmon harvest rates and disparity in commercial harvest rates throughout the season may totally disenfranchise personal use Chinook harvest opportunity (as occurred in 2025) and cause unpredictable and extreme variations in already conservative upriver sport regulations and harvest opportunities. — Example: 36 plus days of sport Chinook harvest opportunity on

Gulkana River (17 restricted) compared to 6 days of sport Chinook harvest opportunity on the Klutina and Tonsina Rivers (all 6 days restricted) during the 2025 season.

to correct an error in regulation: N/A

to correct an effect on a fishery that was unforeseen when a regulation was adopted: Board of Fisheries (BOF), Copper River salmon user groups, and the public trust and expect ADF&G to manage Copper River Chinook Salmon stocks on a conservative and sustainable basis that consistently meets the department's established SEG, and provides reasonable harvest opportunities throughout the season as established in BOF adopted conservative daily and annual harvest limit regulations. While 2025 Prince William Sound Advisory Announcements #5 and #6 may follow a conservative and sustainable Copper River Chinook Salmon management approach, ADF&G's earlier and later-in-the-season management of the commercial fishery within the Copper River District (allowing over harvest of Chinook salmon) is unacceptable in both conservatively managing to meet the 21,000 - 31,000 SEG and also in managing this public resource to provide reasonable harvest opportunity (allocation provided by regulation) throughout the season for all user groups. Commercial management decisions should be designed to conservatively meet the SEG midpoint — rather than requiring disruptive inseason emergency regulations — for all user groups with conservative harvest limits, more often than not.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE? A significant portion of the public believes (based on previous ADF&G and 2025 ADF&G management decisions) if this issue is not addressed the department may continue to manage for liberal commercial Copper River Chinook salmon harvest opportunity, that jeopardizes attainment of the SEG midpoint, and robs other user groups of their reasonable BOF-adopted Copper River Chinook Salmon harvest opportunities.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. The Board has set no specific Copper River Chinook Salmon allocation levels based on specific harvest number or percentages — even for priority subsistence fisheries, one of which (Upper) was restricted for Chinook conservation reasons during the 2024 fishing season, and the other of which (Lower) was restricted for Chinook conservation reasons during the 2025 fishing season. It should be considered that all subsistence, personal use, and sport permit / license holders have seasonal and / or daily harvest limits, a form of allocation according to 5 AAC 39.222 Policy for the management of Sustainable Salmon Fisheries (f) (1), while commercial drift gillnet permit holders MAY harvest all the Chinook they can catch during each / every commercial opening using large drift gillnets. Because of this liberal harvest opportunity provided during each commercial opening, it is imperative that commercial Chinook harvest be conservative enough, through time and area restrictions, in order to maintain BOF adopted, and more conservative, allocations limited by daily bag and / or seasonal limits for the remaining user groups. This presents a dilemma when all but one user group has specific daily and / or seasonal limits. The purpose of this ACR is providing the BOF an opportunity to adopt a regulatory more conservative and more consistent commercial Chinook harvest rate throughout the season — better ensuring attainment of the Copper River Chinook Salmon SEG midpoint, and better

maintaining reasonable and consistent Chinook escapements and BOF adopted harvest “allocations” for all user groups.

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE. While the Department claims neutrality on allocation issues, and touts ADF&G management for sustainability (despite the hardship it may cause dependent users), 2025 ADF&G actions appear far from neutral on allocation, and appear to threaten sustainability of Copper River Chinook Salmon by over harvest — beyond which inseason escapement goal management should allow. At the 2025 Upper Copper River / Prince William Sound BOF meeting the board adopted an amended version of Proposal 51 — part of which adjusted the start of the Copper River commercial fishing season from May 15 until after May 21. Representatives from Chitina Dipnetters Association volunteered a later start date to the Personal Use (P. U.) fishery with a July 1 start to Chinook harvest (70% harvest reduction by date). Proposal 51 was written to address excessively high commercial harvest rate in relation to sonar passage of early returning salmon bound for the Upper Copper River. The board used proposal 51 to more specifically address conservation concerns for Copper River Chinook Salmon. A later commercial season start should boost early season passage of all salmon past the Miles Lake Sonar (counts that had been consistently failing to attain ADF&G’s daily and cumulative sonar objectives through most or the entire of May for several years).

Following the 2025 meeting and the BOF’s adopted change starting the commercial fishery after May 21, ADF&G reduced all its daily and cumulative Miles Lake sonar objectives during the early portion of the season (May and June). All May sonar objectives were reduced by over 40 percent! This meant, that following BOF action to specifically reduce commercial exploitation of early returning Copper River Chinook salmon to provide for conservation and more consistent harvest opportunity upriver, the department’s early season sonar objective reductions may have negated all or nearly all of the BOF intended reduction in commercial Chinook harvest, and likely contributed to shortages of Chinook Salmon upriver, causing inseason harvest restrictions followed by Chinook harvest closure in the upriver sport fisheries and 100 percent elimination of any Chinook harvest opportunity for the upriver Chitina personal use dipnet fishery (which already had the most conservative annual limit of any user group — one per household).

On May 26, 2025 following ADF&G’s reduction in early season sonar objectives, and before the closure of any king salmon harvest in the Chitina personal use dip net fishery, however, the Chitina Dipnetters Association wrote to Governor Dunleavy, specifically asking how reductions in the Miles Lake Sonar objectives were not highly allocative?

On May 29, 2025 ADF&G issued Prince William Sound Salmon Fishery Announcement #5 Which closed commercial fishing in the area addressed in this ACR., while allowing a 12-hour commercial open on May 31. The harvest results demonstrated that the Copper River District commercial fishery could harvest a significant number of sockeye (57, 583 in this 12-hour opener of the remaining waters) with the Chinook harvest (532) considerably lower than the 1,090 Chinook (May 22) and 900 Chinook (May 26) commercial harvests reported in the previous two commercial 12-hour openers. The following commercial harvest opportunity an

18-hour opening using the same closure area on June 2, 2025 produced a 35, 825 drift gillnet sockeye harvest and 388 Chinook harvest.

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

I have participated as a Copper River drainage sport angler for Chinook salmon, Chitina personal use dip netter, and Glennallen Subsistence dip netter — during different years.

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

To the best of my knowledge this ACR has never been considered previously by the BOF — either as a proposal or an ACR. This ACR was broadly written to allow the BOF a wide range of closed water option(s) that might allow for more reasonable, predictable, and consistent commercial Copper River District salmon harvest opportunities throughout the season, while also better conserving the Copper River Chinook Salmon stock. Note: During 2025 Copper River District commercial harvests topped 100 Chinook Salmon for every commercial opener through June 30.

SUBMITTED BY: Andy Couch

ACR 4

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

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

Alaska Administrative Code Number 5 AAC: XXX

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

Following the December 10 -16, 2024 Prince William Sound / Upper Copper River Board of Fisheries Meeting and Board of Fisheries (BOF) adoption of an amended version of Proposal 51 to address Copper River Chinook salmon conservation concerns, the Alaska Department of Fish and Game (ADF&G) reduced their May / June daily and cumulative sonar objectives for the Miles Lake Sonar project that likely increased commercial exploitation of all early arriving Upper Copper River salmon stocks— including Chinook the board taken specific action to manage on a more conservative basis. Significantly reducing all May / early June sonar objectives and then managing the Copper River District commercial fishery to those reduced objectives, clearly negatively impacts management changes made by the board to address Chinook salmon conservation concerns, and clearly contributed to ADF&G likely failing to attain the Copper River SEG during 2025.

Reducing May / early June sonar objectives also produced extremely negative Chinook salmon allocation impacts for all Upper Copper River user groups, and personal use, guided sport, and sport user groups. Because of unusual 2025 low water conditions, results of Chinook Salmon mark / recapture apportionments for early season sonar passage counts were delayed even more than usual, and came with even more uncertainty than usual.

Finally, even when both sonar counts of large fish passage and mark / recapture apportionments appeared to confirm a shortage of chinook salmon causing restrictions, then harvest closure in the Upper Copper River Chinook sport fisheries along with complete closure of the personal use set net chinook harvest opportunity, before it was even scheduled to open — ADF&G management increased the commercial exploitation even more by opening commercial harvest periods inside the expanded Chinook Salmon closure area (Prince William Sound Emergency Announcements #15, #16, #17, #19, #22, #26, #27).

In short, commercial management in recognition of recent failures to attain the Chinook SEG and BOF action on proposal 51 should be more precautionary - and specifically the fishery should be managed to achieve May / early June sonar objectives that were in place in 2024 - as reducing the sonar objectives during this early portion of the season is has the same effect as reducing the king salmon escapement goal during the exact portion of the season when king salmon exploration is the greatest. Any change to lower early season sonar objectives / escapement levels should only occur with specific board approval after being fully noticed and vetted through a noticed and transparent public process. After all this is the legislatively designated State Fish we are talking about.

WHAT SOLUTION DO YOU PREFER?

I request the board follow concepts of the Precautionary Principle discussed in 5AAC 39.222 (5) (A) (i) - (v) in adopting the 2024 May / June daily and cumulative Miles Lake sonar objectives as

an Optimum Escapement Goal(s) to be fully managed to before allowing additional commercial harvest in the Copper River District.

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

for a fishery conservation purpose or reason: The BOF already recognized the conservation purpose when adopting changes in the amended language of Proposal 51 in December 2024 - sonar objectives should therefore continue to support - Not oppose - those conservation related changes.

to correct an error in regulation: I believe it is an error in public process, and therefore an error in regulation for sonar objectives which are actually de facto escapement goals to be reduced without public notice / approval.

to correct an effect on a fishery that was unforeseen when a regulation was adopted: Since there appears to be no / little public notice and vetting for this change - those negative effects already mentioned (reducing likelihood of attaining SEG, significant reduction of board adopted location for all Upper Copper River user groups) should definitely be corrected.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

The Copper River Chinook salmon resource may continue to be managed for decline along with early returning Copper River sockeye. Rather than managing to attain the escapement goal this is clearly a case on managing the goal to support the over harvest, and is clearly unacceptable in managing a public resource on a sustainable basis.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

This ACR seeks to maintain BOF approved escapement goals and BOF adopted allocations — rather than managing to reduce or eliminate them.

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

This ACR is allocatively neutral — and attempts to maintain Copper River Chinook salmon allocations at BOF adopted levels.

STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR. I have been involved in upriver sport, personal use, and subsistence at different times.

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

SUBMITTED 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).

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

Alaska Administrative Code Number 5 AAC: 21.353 Central District Drift Gillnet Fishery Management Plan

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

Since the federal EEZ drift gillnet fishery has started, allowing 200 fathoms of gillnet per drift permit holder, and the State of Alaska has attempted to harvest a larger portion of the remaining harvestable surplus Kasilof and Kenai River sockeye salmon offshore in the drift gillnet fishery, there has been a resulting shortage of Northern bound coho salmon to meet spawning escapement needs and to provide reasonable harvest opportunities for subsistence, commercial, sport, and personal use needs in Northern Cook Inlet. Those shortages have resulted in consistent sport fishing restrictions and closures — in particular at Deshka River and Little Susitna River over the past three years — however even with these inriver restrictions and closures too many salmon had already been harvested and not enough remained to even come close to ADF&G established coho salmon SEGs at both rivers. Adaptive Management Changes need to be made. A more precautionary management approach as outlined in 5 AAC 39.222 is clearly required.

WHAT SOLUTION DO YOU PREFER?

Please consider permanently reducing the amount of State owned Alaska managed commercial drift gillnet fishing allowed in the middle of Upper Cook inlet beyond the Expanded Kenai, Expanded Kasilof, and Anchor Point Sections, — Specifically when larger abundances of Kenai River sockeye allow additional days and hours of drift gillnet harvest— those added harvest opportunities should avoid the primary mixed stocks areas, and only occur closer to the rivers where the abundant stocks are bound, as follows:

(c) From July 9 through July 15,

(2) at run strengths greater than 2,300,000 sockeye to the Kenai River the commissioner may, by emergency order, open one additional 12-hour fishing period in the Expanded Kenai and Expanded Kasilof Section of the Upper Subdistrict [AND DRIFT GILLNET AREA 1];

(d). From July 16 through July 31.

(2) at run strengths of 2,300,000 - 4,600,000 sockeye salmon to the Kenai River,

(A) fishing during **all** [ONE] regular 12-hour fishing periods per week will be restricted to one or more of the following sections and areas:

- (i). Expanded Kenai Section of the Upper Subdistrict;
 - (ii) Expanded Kasilof Section of the Upper Subdistrict;
 - (iii) Anchor Point Section of the Lower Subdistrict;
- [(IV) DRIFT GILLNET AREA 1;]

(B) Additional fishing time under this subsection is allowed only in one or more of the following sections: Expanded Kenai, Expanded Kasilof, Anchor Point. [THE REMAINING WEEKLY 12-HOUR REGULAR FISHING PERIOD WILL BE RESTRICTED TO ONE OR MORE OF THE

FOLLOWING SECTIONS:

- (I) EXPANDED KENAI SECTION;
- (II) EXPANDED KASILOF SECTION;
- (III) ANCHOR POINT SECTION;]

(3) at run strengths greater than 4,600,000 sockeye salmon to the Kenai River, all [ONE] regular 12-hour fishing periods per week will be restricted to the Expanded Kenai, Expanded Kasilof, and Anchor Point Sections;

(B) Additional fishing time under this subsection is allowed only in one or more of the following sections: Expanded Kenai, Expanded Kasilof, Anchor Point. [THE REMAINING WEEKLY 12-HOUR REGULAR FISHING PERIOD WILL BE RESTRICTED TO ONE OR MORE OF THE FOLLOWING SECTIONS:

- (I) EXPANDED KENAI SECTION;
- (II) Expanded KASILOF SECTION;
- (III) ANCHOR POINT SECTION;]

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

for a fishery conservation purpose or reason: Deshka River weir counts indicate that the coho salmon escapement goal used by ADF&G as an indicator stock for the entire Susitna River drainage may not be attained for at least the third year in a row. One more year with a similar coho escapement and Deshka River coho should qualify as a Stock of Management Concern on the same year Deshka River Chinook Salmon may also qualify as a Stock of Management Concern. The 2025 Deshka coho count through August 27 was only 2,408 fish compared to an SEG calling for 10,200 — 24,100 coho. Additionally Little Susitna River weir counts show that the department's primary inseason Knik Arm drainage coho salmon indicator stock, has likely missed its SEG for at least the last 3 years. Another year failing to attain the Little Susitna River coho salmon goal, and the stock should also qualify as a Stock of Management Concern — on the same year that Little Susitna River Chinook Salmon should qualify as a Stock of Management Concern. Finally, coho harvest percentages in the drift gillnet fishery have risen significantly compared to Northern Cook Inlet set net and sport harvest percentages over the past three years — indicative of a newly expanding fishery. There is clearly not just one — but 4 serious conservation purposes that should be recognized and addressed. This ACR attempts to partially address the identified conservation purposes for Deshka River and Little Susitna River coho salmon that are likely also present (but not specifically identified by inseason assessments) at other Susitna River drainage and Knik Arm drainage locations.

to correct an error in regulation: N/A

to correct an effect on a fishery that was unforeseen when a regulation was adopted: I doubt that all BOF members fully considered how much taking more of the Kasilof and Kenai River sockeye harvest offshore, with the drift gillnet fishery, would impact northern bound coho salmon stocks and the Northern Cook Inlet fisheries dependent on the health and abundance of northern coho stocks.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

If nothing is done the Department / BOF may likely be designating Alaska's first two coho salmon Stocks of Management Concern and developing action plans to rebuild and sustainably manage these two significant coho salmon stocks during the 2026 / 2027 BOF cycle. NOTE: This ACR was purposefully written in a manner to allow the BOF broad leeway in how to adjust drift gillnet harvest area(s) during Kenai sockeye abundance levels that allow additional harvest opportunities in the primary mixed stock staging areas — and with Northern Cook Inlet coho stocks (based on ADF&G's Deshka and Little Susitna River escapement data) rapidly approaching Stock of Management Concern status. This is a festering and reoccurring problem that should be adequately addressed with more permanent regulation — rather than a single year of discretionary ADF&G commercial management.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

The stated purpose of The Central District Gillnet Fishery Management Plan . . . “ is to ensure adequate escapement and a harvestable surplus of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District salmon and Kenai River coho salmon in order to provide all users with a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions. The department shall manage the Central District commercial drift gillnet fishery as described in this section.” Therefore, if provisions within the plan allow too liberal of drift gillnet fishing to achieve the BOF adopted purpose of the plan the plan should be amended / clarified — before liberal drift gillnet fishing opportunity significantly contributes to creating multiple coho salmon Stocks of Management Concern.

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

Providing for Escapement needs and allocation was already adopted by the BOF in the purpose statement of the Central District Drift Gillnet Fishery Management Plan. Since both escapement and Northern Cook Inlet allocations are being shorted by a newly expanding drift gillnet fishery, adjustments should be made as outlined in 5 AAC 39.222 Policy For the Management of Sustainable Salmon Fisheries (2) (F): “salmon escapement and harvest management decisions should be made in a manner that protects non-target salmon stocks or species; and (5) in the face of uncertainty, salmon stocks, fisheries, artificial propagation, and essential habitats shall be managed conservatively as follows:”

“(A) a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and habitat management, the biological, social, cultural, and economic risks, and the need to make action with incomplete knowledge, should be applied to the regulation and control of harvest and other human-induced source of salmon mortality;”

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

Northern Cook Inlet freshwater sport fishing guide, personal use, sport angler.

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

To the best of my knowledge - No. However, many adjustments have been proposed and made to this plan overtime.

SUBMITTED BY: Andy Couch

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).

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

Alaska Administrative Code Number 5 AAC: 21.358 Northern District Salmon Management Plan

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

Please address the issue of management failure to achieve the Little Susitna River coho salmon Sustainable Escapement Goal (SEG) on a near-chronic basis, that with one additional year of failure should cement this very important Upper Cook Inlet coho salmon stock — as a stock of management concern.

WHAT SOLUTION DO YOU PREFER?

Amend the plan to conservatively manage Little Susitna River and coho salmon to ensure the SEG is met on a more regular basis, and “ . . . to provide sport, guided sport, and other inriver users a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the number of inseason restrictions, or as specified in this section and other regulations,” as quoted from the plan, as follows.

(b) The department shall manage the Northern District commercial fisheries based on the abundance of sockeye salmon counted through the weirs on Larson, Chelatna, and Judd Lakes, and based on the abundance of king and coho salmon counted through the Little Susitna River weir or other salmon abundance indices as the department deems appropriate.

(1) from July 13 - September 30, sport fishing shall be restricted to artificial lures only in Little Susitna River; and commercial fishing within one mile of the Little Susitna River terminus with Knik Arm shall be restricted to one net not more than 35 fathoms in length per permit holder, unless the department's inseason projection for Little Susitna River coho salmon escapement exceeds the midpoint of the Little Susitna River coho salmon SEG.

(2) When bait fishing is closed in the Little Susitna River sport fishery after August 5, the Northern District Commercial Set Net Fishery shall be restricted to regular fishing periods of no more than 6 hours in duration.

(3) When harvest is prohibited in the Little Susitna River coho salmon sport fishery, commercial fishing within one mile of the Little Susitna River terminus with Knik Arm shall be prohibited.

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

for a fishery conservation purpose or reason:

The Department has restricted sport coho salmon fishing, followed harvest closures in the Little Susitna River sport fishery for the past 3 years. Even with these inseason restrictions and closures, there has not been enough coho salmon remaining to even document achievement of the Little Susitna River coho salmon SEG in each of the past 3 years. Even with significant shortages of coho salmon at Little Susitna River for the past 3 years, ADF&G management has allowed the same level of commercial set netting within one mile of the Little Susitna River terminus with Knik Arm as elsewhere in the General Subdistrict of the Northern District for the

past two years. This management is failing miserably with far too little adaptive change by ADF&G. Current regulations and management practices should be adjusted in a lasting precautionary manner to better meet the purpose language of the management plan - before Little Susitna River coho salmon are required to be listed as a stock of concern.

to correct an error in regulation: N / A

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

At the last Upper Cook Inlet Board of Fisheries, the board added Little Susitna River king and coho salmon as indices the department shall use in managing the Northern District commercial setnet fishery. The board left the department with great flexibility in how to achieve the purpose(s) of the management plan. ADF&G management practices and multiple Little Susitna River coho salmon escapements significantly below the SEG clearly illustrate the need for lasting plan clarification in order to meet the SEG and provide reasonable opportunities for all user groups — throughout the entire season, consistently.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Without management change — the same practices will likely produce the same failing results — as repeated history clearly shows. Conservative and lasting change to this management plan is needed to produce the Board adopted objectives from this plan — and to avoid continually rehashing this issue every year or every three years.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

While there are allocative aspects, the primary purpose of this ACR is to conservatively manage the Little Susitna River coho salmon resource on a precautionary basis, focusing management for the SEG midpoint, then after ADF&G inseason assessment shows additional harvestable surplus coho salmon, current regulations may allow all user groups additional harvest opportunity throughout the remainder of the season.

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

Avoiding stock of concern designation for Little Susitna River coho salmon should be a primary objective for the BOF and ADF&G. In addition to ensuring more regular attainment of the Little Susitna River coho salmon SEG, harvest opportunities for all northern user groups should be more predictable, sustainable, and consistent throughout the entire season with these changes. As repeatedly stated, these changes would better ensure attainment of the management plan purpose / objectives. After 3 consecutive years of failure to attain the Little Susitna River coho salmon SEG, there is a desperate need for more precautionary / conservative management to make up for those documented spawning escapement shortages in a lasting fashion for the future health of this salmon stock.

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

I am a Northern Cook Inlet sport fishing guide, who has been operating for over 40 years primarily at Little Susitna River, but also at Deshka River, other locations in the Susitna River and Knik Arm drainages.

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

These paired restrictions for both sport and commercial users, to better achieve the SEG and provide reasonable harvest opportunities for all user groups, have not been previously considered, either as an ACR or proposal.

SUBMITTED BY: Andy Couch

ACR 7

Prohibit the sport fishing technique of “flossing” in Ship Creek (5 AAC 59.122)

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

5 AAC 59.122 Special provisions for the seasons, bag possession, annual, and size limits, and methods and means for the Anchorage Bowl Drainages Area.

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

Flossing at Ship Creek. Only allow bait or lures.

WHAT SOLUTION DO YOU PREFER?

Make flossing illegal at Ship Creek.

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

for a fishery conservation purpose or reason:

Too many salmon end up dying before they can get to the hatchery. The flossers rip holes in the fish or their line breaks off and hooks are still in the fish. Some flossers will actually take more than salmon than allowed. I’ve seen them take a King salmon, go to their car and keep fishing and snag more salmon. They usually do this at low tide when there are few people around.

to correct an error in regulation:

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

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

The hatchery can’t use fish that have holes or hooks in them, Less fish that can be used for replenishing the stock, means less fish coming back to the hatchery each year.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

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

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

I’m a sport angler.

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

SUBMITTED 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 30.250, 5 AAC 30.320, 5 AAC 30.331).

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

Alaska Administrative Code Number 5 AAC:30 Yakutat Area

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

A storm surge in 2025 has altered the mouth of the Tsiu River so that it is now a tributary to the Kaliakh River. Previously, the Tsiu River mouth connected directly to the sea. In the Yakutat Area management plan, the Tsiu River was subject to specific regulations for the set gillnet fishery to project spawning escapements. These included reduced number of fishing days, net length, obstruction of the waterway and closed waters. With the change in river mouth location, Tsiu River salmon are now subjected to increased exploitation rates. The Kaliakh is a much larger river with a larger run of coho. It is open for more time each week than the Tsiu. By placing setnets around and below the confluence Tsiu fish will be caught when the Tsiu is closed harming the run and sportfishery.

WHAT SOLUTION DO YOU PREFER?

Close the Tsiu River and all waters within ¼ mile radius of the Tsiu River and Kaliakh River confluence to fishing with set gillnets by amending 5 AAC 30.350(12).

Repeal management plan sections regarding fishing days in the Tsiu River [5 ACC 30.320(1)], set gillnet length in the Tsiu River [5 AAC30.331(a)(2)(C)] and waterway obstruction [5 ACC 30.331(b)] as they are no longer applicable.

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

for a fishery conservation purpose or reason:

This change is needed to protect spawning escapements in the Tsiu River in order to avoid unintended increases in set gillnet fishery exploitation rates resulting from a storm related change in the Tsiu river mouth configuration.

to correct an error in regulation: N/A

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

The current regulation was adopted when the Tsiu River mouth connected directly to the sea but a storm surge in 2025 has altered the mouth of the Tsiu River so that it is now a tributary to the Kaliakh River. Increases in fishing pressure on Tsiu River salmon runs under the current management plan are an unforeseen consequence of this change in river morphology. The Tsiu fish will be harvested when fishery is closed. This is scenario that has never happened before and needs to be addressed with regulation.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Tsiu River salmon escapements will be subject to increased harvest by the commercial set gillnet.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

This ACR is not predominantly allocative but effectively restores allocative balance of the current management plan prior to the storm-related change in river mouth and avoids unintended allocative effects of the river mouth change. With the merger of the rivers, the allocation has shifted towards commercial harvesting. The new regulation will actually put it back as intended.

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

N/A

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

Sportfishing lodge on the Tsiu River

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

The board has considered proposals dealing with the conduct of the sport and commercial fishery on previous occasions. None of those cases was the river mouth altered to its current configuration. The change proposed in this current ACR was not considered in last in-cycle Southeast Alaska Board meeting because the river mouth changing storm happened after the meeting

SUBMITTED 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).

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

5AAC 28.430 Lawful gear for Kodiak Area Groundfish

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

The Alaska Jig Association submitted a proposal to the next Statewide Finfish and Supplemental Issues BOF meeting: regarding the use of multiple gear types during the Statewide Jig fisheries with the goal of limiting lawful gear onboard to mechanical jig and hand troll only.

After discussions with stakeholders, Alaska Wildlife Troopers, NOAA Enforcement, and local processors, there is evidence that Kodiak area jig registered vessels with longline and slinky gear onboard, are consistently and repeatedly making landings significantly larger than vessels with only mechanical jig gear or hand troll gear onboard.

The purpose of this ACR is to correct technical issues in the original proposal, and by doing so it changes the scope from a Statewide issue to a Kodiak area issue.

The correction consists of limiting the issue to the Kodiak area, and allowing other areas to decide if illegal fishing negatively impacting jig fisheries is a problem in their area.

This necessitates an ACR to avoid delaying a resolution until the next Kodiak Area Finfish cycle, which will not occur before 2027.

The Kodiak Statewide Pacific Cod Jig fisheries occur at the same time IFQ halibut and sablefish fisheries in federal waters. Even if the federal cod fishery is closed, possession of multiple gear types and pacific cod bycatch is allowed, making it difficult for enforcement to discern lawful landings from unlawful landings.

Anecdotally, up to a third of the pacific cod jig harvest may be unlawfully landed. Failure to address this issue out of cycle could lead to substantial loss of opportunity to the Kodiak area jig fleet operating legally.

This is new information that was not available at the time of the regular Kodiak Finfish cycle.

Summary: in the Kodiak area Pacific cod jig fisheries, landings made by jig registered vessels with gear onboard other than mechanical jig or hand troll, are redistributing meaningful harvest from lawful jig fishery participants to unlawful jig fishery participants primarily utilizing illegal longline and slinky pot gear.

WHAT SOLUTION DO YOU PREFER?

In the Kodiak area Pacific cod jig fisheries, vessels registered to jig fish may only carry mechanical jigging machines and hand troll gear. Long line gear, reels, drums, and slinky pots are prohibited

on board while prosecuting the fishery, traveling to or from the fishing grounds or offloading jig cod harvest

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

This proposal is the result of new information that negatively affects the conservation and management of the Kodiak area Pacific cod jig fisheries. Substantial Pacific cod jig harvest is being taken illegally, thus violating the Board's intent to create and support small vessel and entry level fisheries.

for a fishery conservation purpose or reason: Jig fishery participants harvesting with illegal longlines and slinky pot gear are prone to undue gear loss, owing to clandestine nighttime hauling as well as the surreptitious nature of utilizing unmarked illegal gear. Probable illegal gear loss is a conservation concern.

to correct an error in regulation: this proposal does not address an error in regulation

to correct an effect on a fishery that was unforeseen when a regulation was adopted: This proposal corrects an effect that was unforeseen when the regulations were adopted- the extent of illegal fishing negatively impacting Kodiak area legal jig fishers.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

The legally operating Kodiak area jig fleet will continue to lose substantial harvesting ability due to illegal harvesting by alternate gear types.

It is likely that if this is not corrected, there will be an associated increase in the number of vessels acting outside the intent of the jig regulations.

Jig fishermen will continue to perceive those potentially utilizing illegal gear as having an advantage, and could lead to confrontations on the fishing grounds.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

This ACR is not predominantly allocative, as it seeks to only to disincentivize illegal fishing behavior amongst Kodiak area fishers who make Pacific cod jig landings.

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

Not applicable

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

Commercial Fisherman

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

This ACR has not been previously considered by the Board of Fisheries. This ACR is Respectfully Submitted by the Alaska Jig Association, as decided upon a vote of the majority of the membership at the annual meeting in May 2025.

SUBMITTED BY: Darius Kasprzak, Alaska Jig Association