

STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES
DIVISION OF MINING, LAND AND WATER
SOUTHCENTRAL REGIONAL LAND OFFICE

PRELIMINARY DECISION

ADL 234304
Alaska Longneck Farms LLC
Application for Lease
AS 38.05.083

This Preliminary Decision (PD) is the State's preliminary best interest finding regarding a proposed disposal of interest in state land. The public is invited to comment on this PD. The deadline for commenting is **11:59 pm November 28, 2025**. Please see the Public Notice section of this decision for requirements related to submitting comments for consideration.

Requested Action:

The Department of Natural Resources (DNR), Division of Mining, Land and Water (DMLW), Southcentral Regional Land Office (SCRO) has received a request from Alaska Longneck Farms LLC to lease 8.36 acres, more or less, of state-owned tide and submerged lands for 10 years to commercially grow and harvest Pacific geoduck (*Panopea generosa*) located near Ketchikan, Alaska. The location of the project area is further described as being within the NW1/4 of Section 34 and the SW1/4 of Section 27, Township 77 South, Range 95 East, Copper River Meridian.

Requested Improvements:

Parcel 1: 1,530 feet by 238 feet (8.36 acres, more or less)

Year-round predator netting: 100 feet by 48 feet, secured with metal stakes

Four concrete blocks that mark the lease boundary corners

Proposed Action:

SCRO is considering the issuance of a 10-year aquatic farmsite lease to Alaska Longneck Farms LLC to facilitate the commercial growth and harvest of Pacific geoduck (*Panopea generosa*). The proposed aquatic farm will consist of one parcel totaling 8.36 acres, more or less, to plant, grow, and harvest Pacific geoduck. There will be 100-foot by 48-foot predator netting on the tideland floor secured with metal stakes and four concrete blocks, placed year-round to mark the lease boundaries.

Scope of Decision:

The scope of this decision is to determine if it is in the State's best interest to issue this aquatic farmsite lease.

Authority:

This lease application is being adjudicated pursuant to Alaska Statute (AS) 38.05.035(e) Delegation of the Powers and Duties of the Director, AS 38.05.070(b) Generally, and AS 38.05.083 Aquatic Farming and Hatchery Site Leases.

The authority to execute the Preliminary Decision, Final Finding and Decision, and the lease has been delegated to the Regional Manager of SCRO under AS 38.05.035(b)(1).

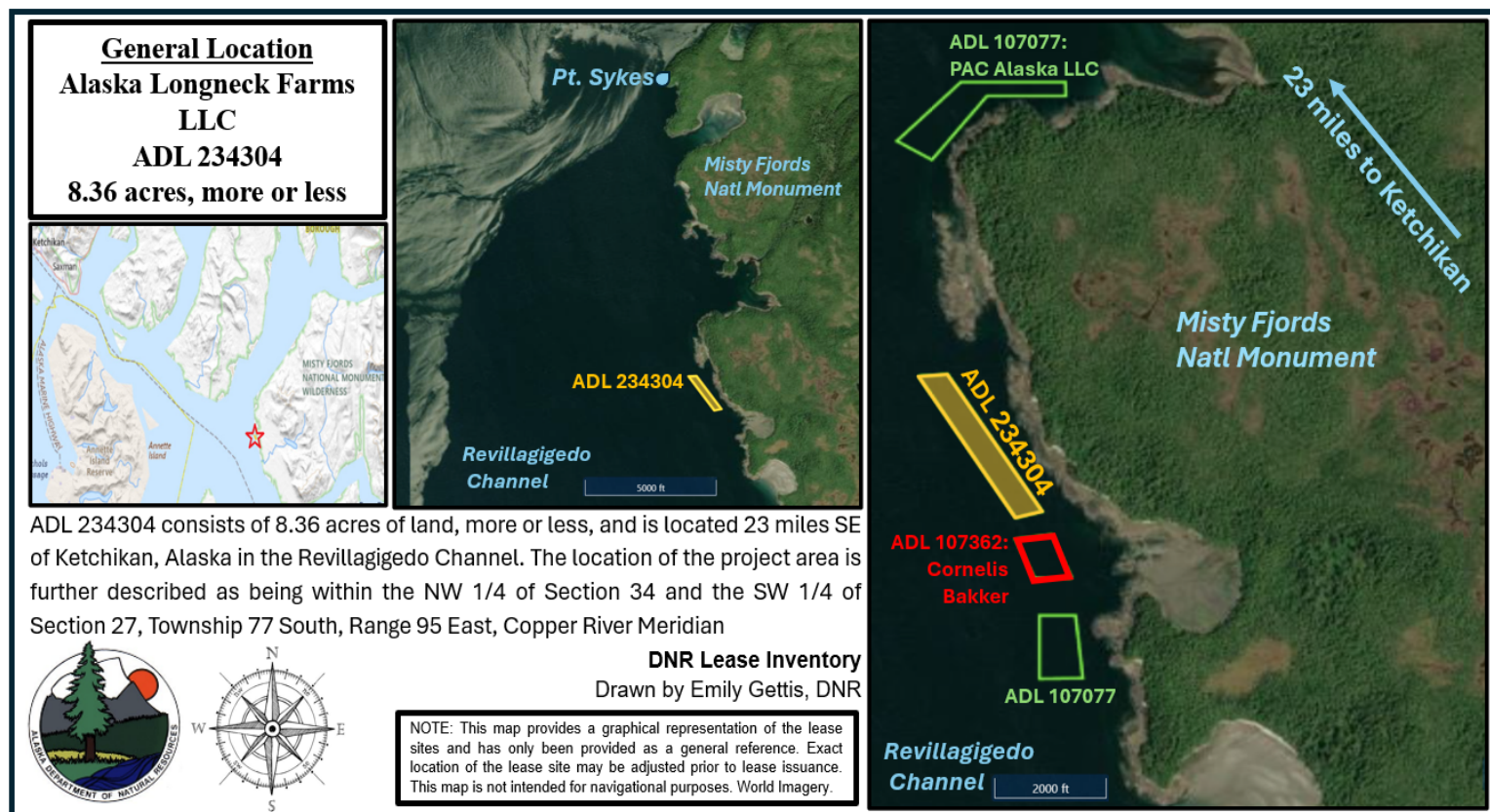
Administrative Record:

The administrative record for the proposed action consists of the Constitution of the State of Alaska, the Alaska Land Act as amended, applicable statutes and regulations referenced herein, the 2000 Central/Southern Southeast Area Plan and other classification references described herein, and the casefile for the application serialized by DNR as ADL 234304.

Legal Description, Location, and Geographical Features:

The state land where this proposed lease site is located is described as follows:

- **Site reference name:** Black Island
- **Geographical locations:** Located 1.5 miles north of Black Island and 2.3 miles south of Point Sykes on the eastern side of Revillagigedo Channel approximately 23 miles southeast of Ketchikan, Alas



- **Approximate Lat/Longs (NAD 83):**

Parcel #1: Intertidal geoduck growout area

NE Corner: 55° 9.534'N 131° 5.294'W
SE Corner: 55° 9.315'N 131° 5.059'W
SW Corner: 55° 9.305'N 131° 5.125'W
NW Corner: 55° 9.531'N 131° 5.366'W

- **Legal description:** NW 1/4 of Section 34 and SW 1/4 of Section 27, Township 77 South, Range 95 East, Copper River Meridian.
- **Recording district:** Ketchikan
- **Existing parcel survey, if applicable:** N/A
- **Municipality/Borough:** Ketchikan Gateway Borough
- **Native Corporations/Federally Recognized Tribes:** Sealaska Corporation, Cape Fox Corporation, Ketchikan Indian Corporation, Metlakatla Indian Community, Annette Island Reserve, Organized Village of Saxman, Central Council of the Tlingit and Haida Tribes of Alaska
- **Size:** 8.36 acres, more or less

Title:

A DNR Title Report (RPT-24112) was requested on October 8, 2025, from DMLW's Realty Services Section. A Title Report issued from DMLW's Realty Services Section will state whether the State of Alaska holds title to the subject tidelands under the Equal Footing Doctrine and the Submerged Lands Act of 1953. SCRO reserves the right to modify the Final Finding and Decision based upon information contained within the Title Report.

Third Party Interests:

No third-party interests are known at this time.

Classification and Planning:

The project area is subject to the Central/Southern Southeast Area Plan (CSSEAP), Management Unit KT-35: Tidelands adjacent to mainland (Behm Mountain area) Map 3-26: "Ketchikan - South" Region 5. The tideland designation for this site is Habitat, which converts to Wildlife Habitat Land, described in Chapter 4 of the CSSEAP (4-6).

Within Chapter 2 of the CSSEAP, Areawide Land Management Policies, Aquatic Farming section, goals are to "provide opportunities to increase income and diversify the state's economy through the use of state tidelands and submerged lands for aquatic farming" (2-5). Chapter 2 guidelines for Aquatic Farms state that "mariculture may be allowed on state tidelands where there is no significant conflict" (2-6).

The management resources for this area are to protect anadromous streams and areas of Pacific herring spawning during spring, and to protect shorebird concentration in the southern area of the parcel. The nearest anadromous stream to this proposed lease boundary is over 4,000 feet to the north; the geoduck farm's inherently limited infrastructure and discreet gear will not impede fish passage or spawning or damage that anadromous stream.

The adjacent uplands near the proposed lease site are occupied by the Misty Fjords National Monument which is Tongass National Forest Land (TNF). These uplands are designated "Wilderness National Monument" in the Tongass Land and Resource Management Plan (TLRMP). Aquatic farming is recognized and supported as an allowable use under the CSSEAP, and the lease intent and activity upholds this objective. In managing State tidelands and submerged lands adjacent to federal conservation units, specifically the TNF, DNR will take into consideration the management intent for the uplands identified in TLMRP. Activities, including aquatic farming operations, that are incompatible with the management intent will generally not be authorized unless the conditions of other local, state, and federal permits or authorities are met and unless there is an overriding state interest and there is no feasible and prudent alternative (2-6). The Land Use Designation (LUD) goals for Wilderness National Monument in the TLMRP, described in the 2008 TLMRP LUD graphic, are to "preserve essentially unmodified areas to provide opportunities for solitude and primitive recreation. Limit motorized access." Since geoduck farms have minimal infrastructure and no gear is visible on the surface of the water, they are compliant with the Wilderness Designation. Chapter 4 of the CSSEAP explains tideland decisions by the state "shall consider the effects of this action on adjacent federal land" and that state and federal agency "management prescriptions" be compatible to the best of agency abilities and "consistent with the overall best interest of the state" (4-13).

In accordance with the CSSEAP, aquatic farming is an allowable use and is therefore consistent with the plan. The proposed operation must be in the best interest of the state before an authorization may be issued. Factors that are to be considered in this decision are identified in 11 AAC 63.050(b).

Traditional Use Findings:

Traditional use findings will not be discussed in this Preliminary Decision because the proposed lease site is located within the Ketchikan Gateway Borough, an organized borough. Pursuant to AS 38.05.830 a traditional use finding is not required. However, 11 AAC 63.050(b)(5)(B) require consideration of whether the lease site impacts traditional and existing uses of the site. Known traditional and existing uses of the area include, but are not limited to, limited recreation, sightseeing, tourism, sport fishing, salmon hatcheries, and upland access. The proposed aquatic farm should not interfere with traditional and/or existing uses of the area, including commercial or sport fishing, subsistence activities, navigation, and recreation. Public and Agency Notice may reveal more unknown uses. If such information becomes available, any potential or existing conflicts will be addressed in a final best interest finding.

Access:

Access to the aquatic farm is by boat from Ketchikan, Alaska.

Access To and Along Navigable and Public Waters:

AS 38.05.127 and 11 AAC 51.045 require that before leasing land, DMLW determines if a body of water is navigable and if it is, that DMLW provides for easements or reservations as necessary to ensure free access to and along the waterbody. The waters of Revillagigedo Channel are tidally influenced and thus navigable, the lease is located entirely within these waters. Because of the lack of infrastructure needed for geoduck farming, free access to and along the waterbody will not be impeded, thus a .127 easement is not necessary.

Public Trust Doctrine:

Pursuant to AS 38.05.126 all authorizations for this site will be subject to the principles of the Public Trust Doctrine; specifically, the right of the public to use navigable waterways and the land beneath them for: navigation, commerce, fishing, hunting, and other purposes. These rights must be protected to the maximum extent practicable while allowing for the development of this project. As such, SCRO is reserving the right to grant other authorizations to the subject area consistent with the Public Trust Doctrine.

Lease Discussion:

Alaska Longneck Farms LLC submitted an incomplete application for a DNR aquatic farm lease to cultivate Pacific geoduck on February 7, 2024. In response to requests for additional information letters from SCRO and Alaska Department of Fish & Game (ADF&G), Alaska Longneck Farms LLC submitted a complete application on September 22, 2025.

The proposed lease will be comprised of one parcel, consisting of 8.36 acres, more or less. The parcel will measure 1,530 feet by 238 feet for the cultivation of Pacific geoduck. The four corners of the lease boundaries will be marked with labeled concrete blocks. There will be year-round predator netting secured with metal stakes on the ocean floor that is primarily sand and gravel. The netting material is multipurpose “snow fence” made of 3/4-inch heavy-duty plastic that measures 100 feet by 48 feet. The features of an aquatic farm for the purpose of cultivating Pacific geoduck are minimal in infrastructure.

Broodstock, collected in the fall and spawns in early spring, is planted in May. Spat is planted in the subtidal zone, ranging approximately 20 to 60 feet in this area, at a density of two animals every square foot.

The predator netting will be rotated throughout the farm every two and half years. The netting covers and protects the geoduck seed until they have successfully burrowed into the ground. Once this goal has been met and the predator netting is not required for seed protection, the netting is

relocated to the next area where geoduck seed has been planted and remains in place for two and half years. This cycle will continue as needed throughout the lease and the lessee will monitor the farm throughout the year. Geoducks cultivated sub-tidally in Alaska require seven years to grow to the minimum marketable size of 1.5 pounds; the farm will utilize crop rotation and harvests on a seven-year cycle. A full operating capacity, geoduck harvest will occur twice per year after seven to eight years of growth. Harvest is conducted by divers using a hydraulic wand to extract the geoduck.

At this time the Commercial Use Requirement (CUR) states a farm must make annual sales of aquatic farm products of at least \$3,000.00 per acre or \$15,000.00 per farm by the fifth year of operation and continue for the rest of the lease term. Failure to meet CUR constitutes a default and may be cause for termination. Annual reports of sales are due January 31 of each year.

Should the proposed lease be approved, the lease will be issued for a 10-year term beginning no later than one year following the effective date of the Final Finding and Decision. The proposed lease will be subject to the terms of DMLW's standard lease document, and any Additional Stipulations based, in part, upon the following considerations.

Development Plan:

The Development Plan dated September 22, 2025, is accepted by SCRO as complete but may be subject to change based on agency and public review. Should the proposed lease be granted, it is anticipated that the Development Plan will need to be updated throughout the life of the lease as activities and/or infrastructure are added or subtracted. All updates must be approved, in writing, by SCRO before any construction, deconstruction, replacement of infrastructure, or change in activity will be permitted. SCRO reserves the right to require additional agency review and/or public notice for changes that are deemed by SCRO to be beyond the scope of this decision.

Hazardous Materials and Potential Contaminants:

Hazardous materials will not be stored within the proposed leasehold. Requests to store hazardous materials in the future may require additional stipulations.

Lease Performance Guaranty (bonding):

In accordance with AS 38.05.083(e) and 11 AAC 63.080, Alaska Longneck Farms LLC will be required to submit a performance guaranty for the lease site to cover the costs to the department of restoring the leased site in the event the lessee abandons the site for site cleanup, restoration, and any associated costs after termination or expiration of the leases.

\$2,500.00 Performance Guaranty: This bond will remain in place for the life the proposed lease. The bond amount is based upon the level of development, amounts of hazardous material/substances on site, and the perceived liability to the State. This bond will be used to ensure the applicant's compliance with the terms and conditions of the lease issued for their project. This

bond amount will be subject to periodic adjustments and may be adjusted upon approval of any amendments, assignments, re-appraisals, changes in the development plan, changes in the activities conducted, changes in the performance of operations conducted on the authorized premises, or as a result of any violations to one or more of the authorizations associated with this project. The following stipulations shall be included in any authorization pursuant to this decision.

The lessee must post a performance guaranty in the amount of \$2,500.00 to secure faithful performance with all terms and conditions of the Lease and to insure site restoration of the leasehold. This performance guaranty must remain in effect for the duration of the Lease term or until released in writing by the Authorized Officer (AO). The AO for the State of Alaska, DNR, DMLW, is the Regional Manager or designee. Failure by the lessee to provide replacement security shall be grounds for the AO to make a claim upon the existing security to protect the lessor's interests.

If three or more lessees post an association bond to cover all of their leases, the minimum-security amount is 50 percent of the amount individually calculated for each lease. The association must designate an agent for notification purposes. The association has the right to be notified of the termination of a lease covered by its association bond. If neither the former lessee nor the association completes the site restoration as required by AS 38.05.090, the department will use the association bond for this purpose, up to 100 percent of the amount individually calculated for that lease. The association may remove a lease in good standing from the coverage of its association bond after 60 days' notice to the department, during which time the affected lessee must make other arrangements to comply with this section. A lease that is in default or that has been terminated with site restoration still pending may not be removed from the coverage of the association bond.

The guaranty amount will be subject to periodic adjustments and may be adjusted upon approval of any amendments to the Lease, assignments, reappraisals, changes in the Development Plan, approval of a reclamation plan, any change in the activities conducted, or performance of operations conducted on the leasehold and as a result of any violations to the Lease agreement.

The guaranty may be utilized by the AO to cover actual costs incurred by the State of Alaska to pay for any necessary corrective actions in the event the lessee does not comply with the site utilization, restoration requirements and/or other stipulations contained in the Lease agreement. If the lessee fails to perform the obligations under the Lease agreement within a reasonable timeframe, the AO may perform the lessee's obligations at the lessee's expense. The lessee agrees to pay within 60 days following notice, all costs and expenses reasonably incurred by the State of Alaska as a result of the failure of the lessee to comply with the terms and conditions of the Lease agreement. The provisions of this authorization shall not prejudice the State's right to obtain a remedy under any applicable law or regulation. The performance guaranty will be released upon expiration of the Lease provided that all terms and conditions of the Lease have been met, including restoration of the leasehold to a safe and clean condition found acceptable by the AO.

Insurance:

To protect the State from Liability associated with the use of the site, the applicant shall provide and maintain a comprehensive general liability insurance policy with the State of Alaska named as an additional insured party per the stipulations of the authorization. The applicant shall secure or purchase at its own expense, and maintain in force at all times during the term of this lease, liability coverage and limits consistent with what is professionally recommended as adequate to protect the applicant and the State, its officers, agents and employees from the liability exposures of ALL the insured's operations on state land. The insurance requirement may be adjusted periodically.

Survey:

In accordance with AS 38.04.045, this short-term lease does not require a survey. However, the State of Alaska reserves the right to require one in the future, should the need arise due to changes in statutes or increased use of the area. Alaska Longneck Farms LLC has submitted GPS coordinate point(s) for the corners of the proposed leasehold.

Compensation and Appraisal:

DMLW has approved an administrative lease fee schedule for aquatic farmsites that meet the conditions listed within the schedule. The most current lease fee schedule will be used to establish the fair market rental each lessee must pay. Fees are subject to adjustment per AS 38.05.083(c). The current annual rate for an 8.36-acre aquatic farm lease is a base fee of \$450 for the first acre, and \$125 per additional acre or portion thereof. In accordance with the Aquatic Farmsite Fee Schedule, Report No. 2522-16, a breakdown of the lease fee will be as follows:

8.36-acres: (1 acre at \$450) + (8 acres at \$125) = **\$1,450.00/year.**

If the applicant does not agree with the fee schedule amount of \$1,450.00, a fair market value determination can be obtained by the applicant. Fair market value is determined by obtaining a DNR approved appraisal of the lease site. If an appraisal is conducted to determine fair market value of the lease site, the applicant will be required to pay the appraised amount and the \$1,450.00 annual fee will no longer be an option. The appraisal cost will be borne by the applicant. The parcel may need to have an approved Alaska Tidelands Survey to accomplish the appraisal. If a survey is required, the cost will be incurred by the applicant.

Assignment of Lease:

The proposed lease, if issued, may be transferred or assigned to another individual or corporation only with prior written approval from DMLW. A lease will not be assigned to an entity if that entity does not meet the statutory requirements of the lease or if the lessee is considered not to be in "good standing" with this or any other agency authorization.

Subleases:

Subleasing is permissible through AS 38.05.095, if the proposed lease is approved. A sublease is defined as improvements not owned by the lessee that are located within the leasehold on the land or located on structures owned by the lessee. A sublease pertaining to the proposed lease includes but is not limited to, user agreements, license agreements, or any contracts between the lessee and other commercial entities. All potential subleases must first be approved in writing by DMLW. DMLW may conduct further agency review and/or public notice before making a determination on the appropriateness of the proposed sublease. The sublease fee will be 25% of the annual fee paid to the lessee by the sublessee. All sublessees and activities must meet the statutory qualifications under which the original lease was issued.

Reclamation:

In accordance with AS 38.05.090(b), all lessees must restore their lease sites to a “good and marketable condition” within 120 days after termination of the lease.

Agency Review:

An Agency Review was conducted starting on September 29, 2025, and ending on October 20, 2025. Information and comments received from sections within DMLW prior to and during agency review have been considered and included in the preparation of this PD. The following agencies were included in the review:

- DNR Division of Parks and Outdoor Recreation
- DNR DPOR Office of History and Archaeology, State Historic Preservation Office
- DNR Natural Resource Conservation and Development Board
- DNR Division of Oil and Gas
- Alaska Department of Fish and Game
- Alaska Department of Environmental Conservation
- Alaska Department of Transportation and Public Facilities
- Alaska Department of Commerce, Community, and Economic Development
- Alaska Mental Health Trust Land Office
- Alaska Association of Conservation Districts
- U.S. Forest Service
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- U.S. National Park Service
- National Oceanic and Atmospheric Administration
- U.S. Environmental Protection Agency
- U.S. Coast Guard

Agency Review Comment(s):

During the Agency Review, SCRO received two comments.

U.S. Army Corps of Engineers (USACE) Comment: On September 29, 2025, and on October 17, 2025, USACE provided this comment:

The United States (U.S.) Army Corps of Engineers (USACE) Regulatory Division is in receipt of the agency review notice for ADL 234304. Geoduck farming may result in a Section 404 of the Clean Water Act discharge of fill material into waters of the U.S. and may be located in a Section 10 waterbody. Department of the Army (DA) authorization is required if anyone proposes to place dredged and/or fill material into waters of the U.S., including wetlands and/or perform work in navigable waters of the U.S.

Section 404 of the Clean Water Act requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into waters of the U.S., including jurisdictional wetlands (33 U.S.C. 1344). USACE defines wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

Section 10 of the Rivers and Harbors Act of 1899 requires that a DA permit be obtained for structures or work in or affecting navigable waters of the U.S. (33 U.S.C. 403). Section 10 waters are those waters subject to the ebb and flow of the tide shoreward to the mean high water mark, and/or other waters identified by the Alaska District. Aquaculture structures and work would require Section 10 Authorization.

SCRO Response:

SCRO acknowledges USACE's comment. SCRO has provided a copy of the email from USACE to Alaska Longneck Farms LLC on October 23, 2025, and notified them to contact the USACE for their specific permit information.

Alaska Department of Fish and Game (ADF&G) Comment: On October 20, 2025, ADF&G provided this comment:

The Alaska Department of Fish and Game (ADF&G) has completed a preliminary review of the project proposal, ADL 234304 relevant to criteria specified in authorizations for Aquatic Farming AS16.40.105 and 5 AAC 41 200-400. ADF&G Division of Commercial Fisheries (Management, Gene Conservation Lab and Fish Pathology Section), Division of Sport Fish, Division of Wildlife Conservation, Subsistence Section and Habitat Section, were part of the initial review. There are no concerns pertaining to an aquatic farm operation permit at the proposed location. Any comments from other government agencies

or from the public that may impact applicable department provisions will be considered as part of the final department review for an aquatic farm operation permit which will be issued within 30 days of the lease being issued. Recommendations from this preliminary review are summarized below.

Division of Commercial Fisheries has reviewed this request and have no concerns. This site was previously permitted as an aquatic farm site for geoduck from 2005-2020. The previous site owner harvested wild stock and replanted the site with commercially produced geoduck seed. The site was determined to all be aquatic farm stock (5AAC 41.258) in 2016 therefore no site survey is required.

Division of Wildlife Conservation

Marine Mammal Research Program: This application complies with the guidelines set forth with the ADF&G marine mammal mariculture policy updated in April 2024. Any advisories or mitigation steps recommunicated by NOAA Fisheries National Marine Fisheries Service (NMFS) or the US Fish and Wildlife Service (FWS) to reduce marine mammal disturbances should be followed. Large whales, especially humpbacks, are highly susceptible to entanglement in lines in the water; Removing all gear from the water during the non-growing season may minimize gear loss, user conflicts, and marine mammal entanglement and habitat exclusion potential. Any marine mammal entanglements should be immediately reported to the NMFS 24 hr. Stranding Hotline, phone – (877) 925-7773 and the ADF&G Permit Coordinator (907-465-4724).

SCRO Response:

SCRO acknowledges ADF&G's comment. As one of the resource managers in the area, ADF&G's input is an important source of information. SCRO relies on input from ADF&G and other stakeholders to advise of any expected impacts and solutions that may fall outside of SCRO's authority. SCRO has provided a copy of ADF&G's October 20, 2025, letter to the applicant. As requested by ADF&G, the PD herein contains ADF&G's letter, with the full Department Advisory, which will be advertised for a 30-day public comment period.

DNR's statutes and regulations for aquatic farmsite leases do not specify management of aquatic farms relating to fish and game but authorize SCRO to consider issuing a lease on state owned tideland, shoreland, and submerged land to develop aquatic farms. Management of fish and game is within the authority of ADF&G, and as such, SCRO must defer to them and encourages the applicant to work directly with them. ADF&G may include the conditions it deems appropriate regarding fish and game to its operation permit authorization.

Public Notice of the Preliminary Decision:

Pursuant to AS 38.05.945, this PD will be noticed for a 30-day public comment period starting on October 29, 2025. The Ketchikan and Metlakatla post office(s) located near the proposed leasehold

will be requested to post the notice pursuant to AS 38.05.945(b)(3)(C). The notice will be posted on the Alaska Online Public Notice website pursuant to AS 38.05.945(b)(3)(B) located at: <https://aws.state.ak.us/OnlinePublicNotices/Default.aspx>. Additionally, Public Notice will be sent to all interested parties including Sealaska Corporation, Cape Fox Corporation, Ketchikan Indian Corporation, Metlakatla Indian Community Annette Island Reserve, the City and Borough of Ketchikan, neighboring property owners, and DMLW authorization holders.

The public is invited to comment on this PD. All comments received during the public comment period will be considered in the Final Finding and Decision (FFD). A copy of the FFD, along with instructions on filing an appeal, will be sent to all persons who comment on the PD. If public comments result in significant changes to the PD, additional public notice may be given.

To be eligible to appeal the FFD, a person must provide written comments during the PD comment period.

Written comments about this project must be received in this office no later than 11:59 PM on November 28, 2025, to be considered.

To submit comments, please choose one of the following methods:

Postal: Department of Natural Resources
Southcentral Regional Land Office
ATTN: Emily Gettis
550 West 7th Avenue Suite 900C
Anchorage, AK 99501-3577
E-mail: Emily.gettis@alaska.gov
Fax: (907) 269-8913

DNR-DMLW complies with Title II of the Americans with Disabilities Act of 1990. Individuals with disabilities who many need auxiliary aids, services, or special modifications to comment should contact Alaska Relay at 711 or 1-800-770-8973 for assistance at no cost.

Signature Page Follows

Recommendation:

DMLW has completed a review of the information provided by the applicant, examined the relevant land management documents, agency comments, and land ownership, and has found that this project is consistent with all applicable statutes and regulations. DMLW considered both direct and indirect benefits to the State. DNR finds granting of the proposed lease provides the greatest benefit to the State. I recommend proceeding to public notice for the purpose of providing the members of the public and those entities identified in AS 38.05.945 with an opportunity to review and submit comments.



10/29/2025

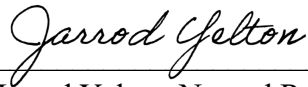
Emily Gettis

Date

Natural Resource Specialist 3

Preliminary Decision:

It is the determination of DMLW that it may be in the State's best interest to issue an aquatic farmsite lease to Alaska Longneck Farms LLC, as described above. This Preliminary Decision shall now proceed to public notice.



10/29/2025

Jarrod Yelton, Natural Resource Manager 1

Date

Southcentral Regional Land Office

Division of Mining, Land & Water

Attachments

- Attachment A – Development Plan
- Attachment B – ADF&G Letter

Attachment A Development Plan

PROJECT DESCRIPTION

DATE SUBMITTED:

5/8/24

date revised and accepted:
9.22.2025

Company Name

Alaska Longneck Farms

Site Location [Include water body, distance from nearest community, any landmarks, general region of Alaska, and whether on state tidal and/or submerged lands or private. Provide enough information to understand where it is located.]

This is the site previously owned by Brad Nelson and surrendered back to the state. It is between Black Island and Southern Sykes

Site Dimensions, Acres for Each Parcel

~~10 acres~~

8.36 acres
1530' x 238'

Total Acres of All Parcels

~~10 acres~~

8.36 acres

Species You Intend to Farm [Include scientific and common species name]

geoduck

Panopea generosa

Attachment A Development Plan

Culture Method [Describe operation activities to be done onsite such as outplant of seedstock, husbandry techniques to be used (culling, sorting, washing, etc.), maintenance and monitoring activities, management of fouling organisms and incidental species, predator control measures, and schedule of activities such as timing of outplanting seeded lines or adding seedstock into trays, etc. Describe what methods you plan to use based on the definition in [5 AAC 41.400\(6\)](#). "Culture" means to use or the use of methods to manipulate the biology and the physical habitat of a desired species to optimize survival, density, growth rates, uniformity of size, and use of the available habitat, and to efficiently produce a product suitable for a commercial market.]

plant spat at a density of approximately 2 animals/ft square, in subtidal environment 20-80 feet deep, install predator netting. Collect broodstock in fall, spawn in early spring and begin plant in May.

BROODSTOCK COLLECTION + HATCH INCLUDED TO INDICATE
TIMING OF SEED AVAILABILITY IN MAY.
WILL PLANT EVERY YEAR ON ROTATION BASIS.
PREDATOR NETTING SECURED W/METAL STAKES. MONITORED
4X/YR. LEASE SITE BOUNDARIES MARKED BY CONCRETE BLOCKS

Culture Gear and Equipment (Type, Size, Number, Configuration, Material, and Anchoring System) [If more than one parcel, indicate what parcel specific gear will be located on. If more than one species, indicate gear to be used for each. Gear includes any structure that holds or protects the organism like trays, tiers of lantern nets, Vexar bags, OysterGro system, grow-out submerged longlines, predator netting, longlines, buoys, depth control systems, etc. Include approximate installation schedule, or if and what gear will remain installed year-round etc.]
Will use snow fence as predator netting

PREDATOR NETTING WILL REMAIN IN PLACE
YEAR ROUND FOR 2 YRS THEN REMOVED.
LEASE BOUNDARIES MARKED BY CONCRETE
BLOCKS.

Attachment A Development Plan

Seed Acquisition Plan (Commercially produced and/or wildstock) [Commercially produced juveniles or seed stock must be obtained from an approved seed source. Do you intend to collect wildstock juveniles or natural set organisms for direct culture on your proposed site? Yes/No. If yes, describe collection methods (applicable for indigenous species: i.e. mussels, scallops, abalone, natural set aquatic plants, etc. This does not refer to broodstock collection on behalf of hatcheries for propagation. If increasing number of acquisitions per year, indicate projected amounts per year. Aquatic plant species can be combined into total feet of line per year.)]

Will purchase spat from seaward hatchery until SE hatchery comes on line in 2025

Harvest Equipment and Method [Describe harvest equipment and methods to be used, activities to be done onsite, and schedule of harvest of aquatic farm product. If more than one species, include harvest information for each species or group of species like macroalgae if the harvest information is the same.]

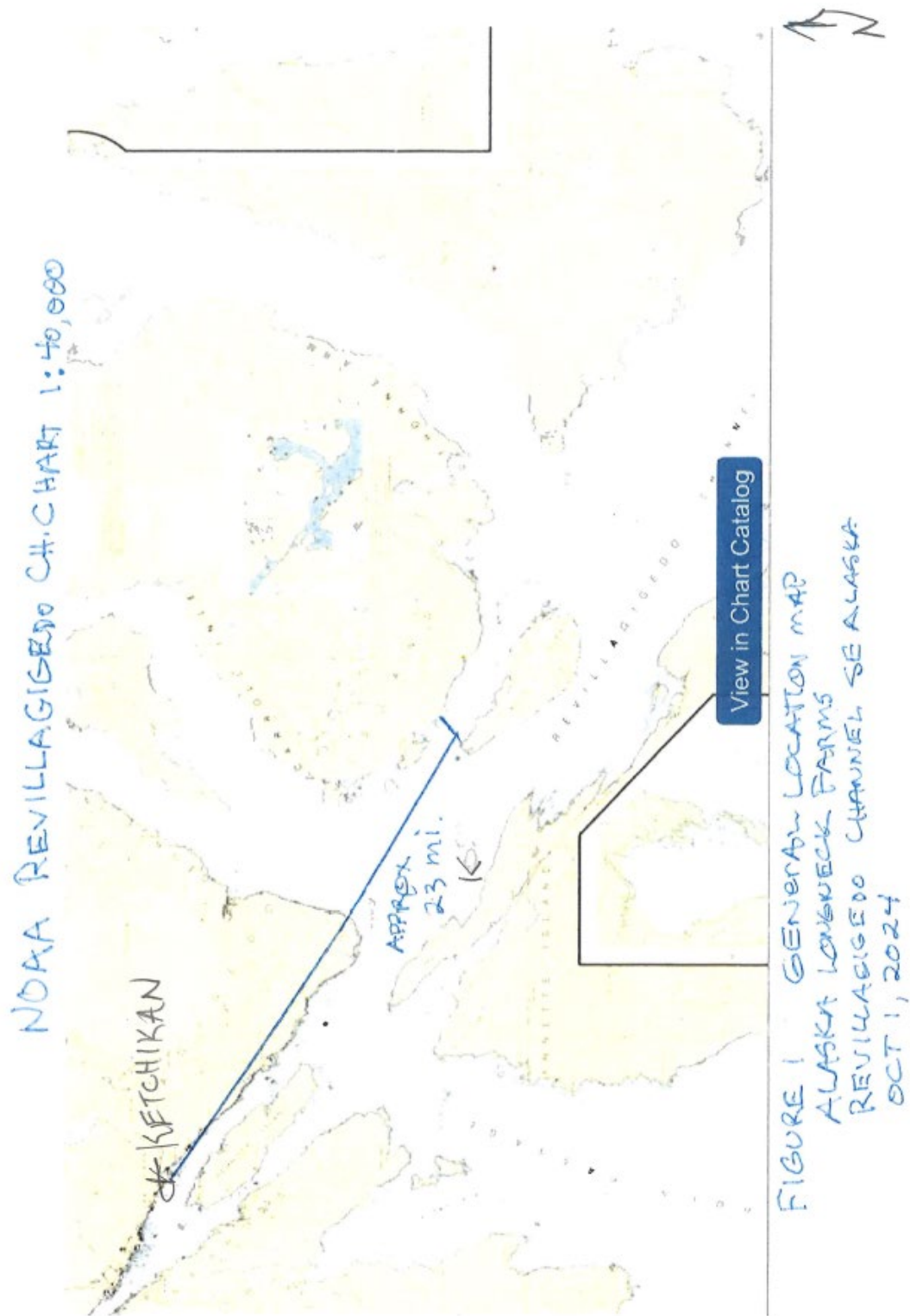
Will use standard procedures for harvest, water jet

STANDARD HARVEST USING HYDRAULIC WAND
AFTER 7-8 yrs Growth

Support Facilities (Type, Size, Number, Configuration, Material, and Anchoring) [Support facilities include caretaker facility, storage rafts, work rafts, processing rafts, etc.]

None

Attachment A
Development Plan



Attachment A
Development Plan

DETAILED LOCATION MAP

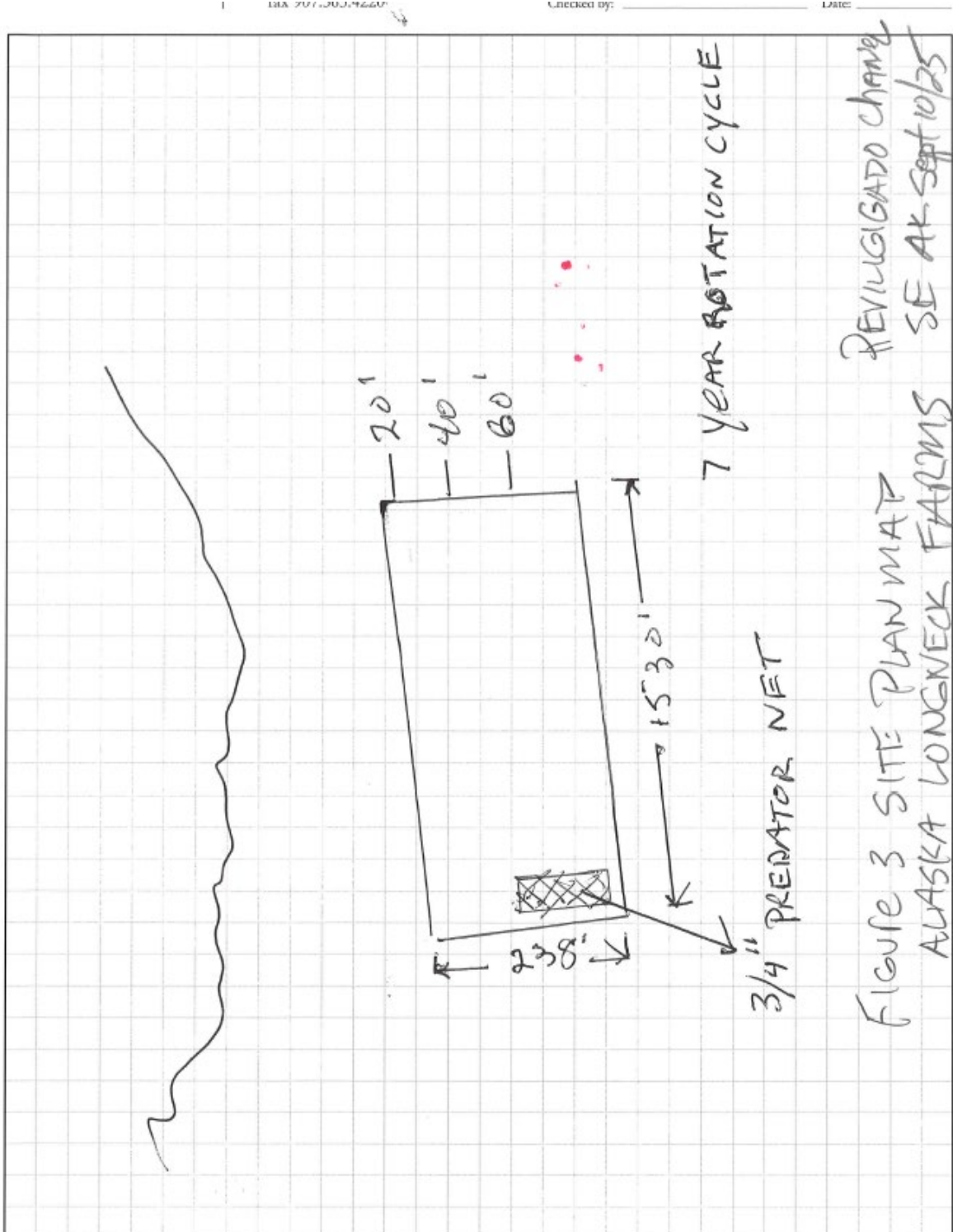


Figure 2 SITE LOCATION
AK Longneck farms
SE ALASKA
1.1.1.2024

DNR MAPPER

AUGUST 6, 2024

Attachment A
Development Plan



Attachment A
Development Plan

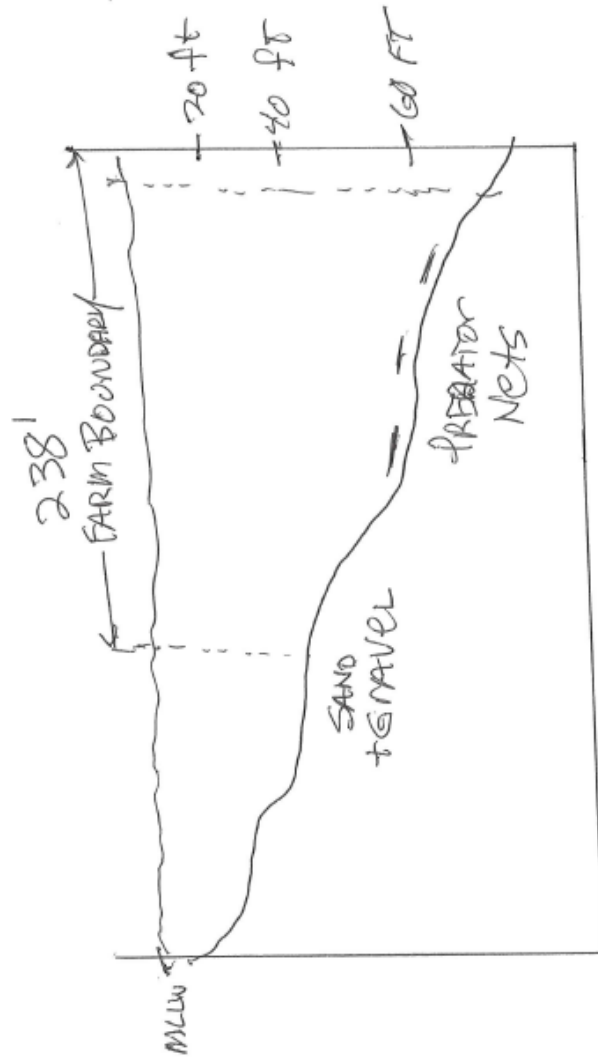


FIGURE 4
CROSS SECTIONAL DIAGRAM
ALASKA LONGNECK FARMS
REVUEGIGADO CHANNEL
Sept 10, 2025

Attachment A
Development Plan

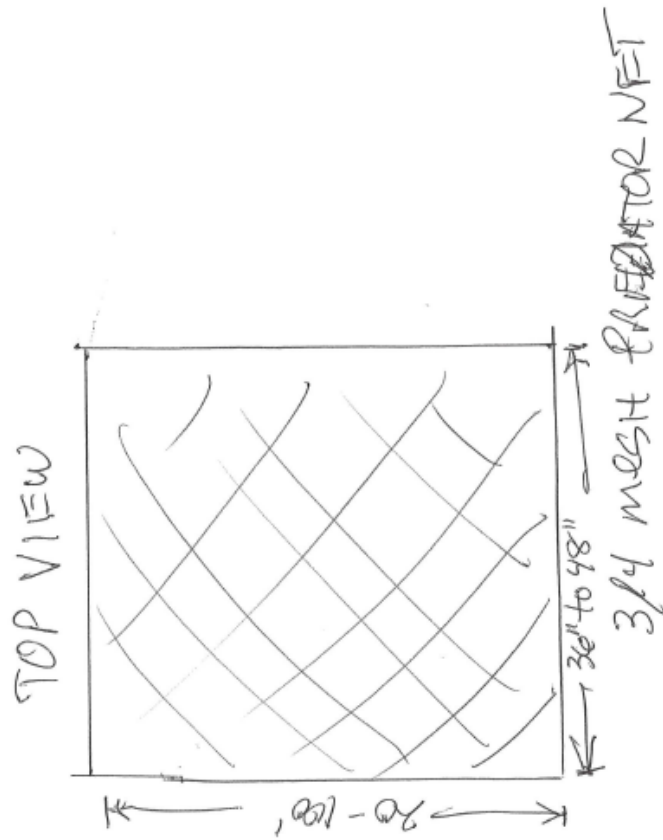


FIGURE 5 ALASKA LONGNECK FARMS
REVULGEATED CHANNEL SUE
Sept 10/25

Attachment B
ADF&G Letter



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Fish and Game

Division of Commercial Fisheries
Headquarters Office

1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526
Main: 907.465.4210
Fax: 907.465.4168
Permit Coordinator: 907.465.4724

October 20, 2025

Emily Gettis
Department of Natural Resources
Southcentral Regional Land Office
Aquatic Farm Leasing Program
550 West 7th Avenue, Suite 900C
Anchorage AK 99501

Re: Alaska Department of Fish and Game Agency Review Comments
Fuhs / Alaska Longneck Farms Aquatic Farm Site Proposal – Black Island
DNR File No.: ADL 234304

Dear Ms. Gettis:

The Alaska Department of Fish and Game (ADF&G) has completed a preliminary review of the project proposal, **ADL 234304** relevant to criteria specified in authorizations for Aquatic Farming AS16.40.105 and 5 AAC 41 200-400. ADF&G Division of Commercial Fisheries (Management, Gene Conservation Lab and Fish Pathology Section), Division of Sport Fish, Division of Wildlife Conservation, Subsistence Section and Habitat Section, were part of the initial review. *There are no concerns pertaining to an aquatic farm operation permit at the proposed location.* Any comments from other government agencies or from the public that may impact applicable department provisions will be considered as part of the final department review for an aquatic farm operation permit which will be issued within 30 days of the lease being issued. Recommendations from this preliminary review are summarized below.

Department Advisory

Please advise the applicant that if the project is approved, general conditions pertaining to Alaska Department of Fish and Game statutory and regulatory provisions for issuance of an Aquatic Farm Operation Permit (AFOP) will be included in the operation permit. In addition, site-specific conditions that have been recommended by staff may be included in the AFOP.

Division of Commercial Fisheries has reviewed this request and have no concerns. This site was previously permitted as an aquatic farm site for geoduck from 2005-2020. The previous site owner harvested wild stock and replanted the site with commercially produced geoduck seed. The site was determined to all be aquatic farm stock (5AAC 41.258) in 2016 therefore no site survey is required.

Gene Conservation Lab has reviewed this request and have no concerns.

Attachment B ADF&G Letter

Emily Gettis
Department of Natural Resources
Aquatic Farm Proposal ADL 234304 ADF&G Review Comments

- 2 -

October 20, 2025

Fish Pathology Section has reviewed this request and have no concerns.

Division of Sport Fish has reviewed this request and have no concerns.

Invasive Species Program Coordinator did not comment at this time.

Division of Wildlife Conservation

Marine Mammal Research Program: This application complies with the guidelines set forth with the ADF&G marine mammal mariculture policy updated in April 2024. Any advisories or mitigation steps recommunicated by NOAA Fisheries National Marine Fisheries Service (NMFS) or the US Fish and Wildlife Service (FWS) to reduce marine mammal disturbances should be followed. Large whales, especially humpbacks, are highly susceptible to entanglement in lines in the water; Removing all gear from the water during the non-growing season may minimize gear loss, user conflicts, and marine mammal entanglement and habitat exclusion potential. Any marine mammal entanglements should be immediately reported to the NMFS 24 hr. Stranding Hotline, phone – (877) 925-7773 and the ADF&G Permit Coordinator (907-465-4724).

Access Defense Program: Has reviewed this request and have no concerns.

Seabird Program: Did not comment at this time.

Habitat Section did not comment at this time.

Subsistence Section has reviewed this request and have no concerns. This area falls within the Ketchikan Nonsubsistence Area.

Our department requests that the Department of Natural Resources consider providing this in their Preliminary Decision as an advisory to the applicant and for public reference.

Thank you for the opportunity to provide comments on this aquatic farm proposal. If you have any questions, please contact me at (907) 465-4724.

Sincerely,



Michelle Morris
Permit Coordinator

ecc: Garold V. Pryor, Aquaculture Section Chief, ADF&G
Paul Fuhs, Alaska Longneck Farms