

MATANUSKA-SUSITNA BOROUGH Fish & Wildlife Commission

350 E Dahlia Ave., Palmer, Alaska 99645

CHAIRPERSON

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VICE CHAIR

Andy Couch

MSB STAFF

Ashley Stick



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Kendra Zamzow

Michael Bowles

Marty Van Diest

Ex officio: Jim Sykes

Regular Meeting September 25, 2025

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Priorities

Physical Location of Meeting: Assembly Chambers
DSJ Bldg, Palmer. Remote Participation: See
agenda.

Planning and Land Use Department - Planning Division

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AGENDA CHANGE REQUEST FORM

ALASKA BOARD OF FISHERIES

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For the 2025/2026 meeting cycle, the following regulatory regions, species and uses are "in-cycle":

- Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod.
- Arctic / Yukon / Kuskokwim Finfish.
- Bristol Bay Finfish.
- Alaska Peninsula / Aleutian Island / Chignik Finfish
- Statewide Finfish and Supplemental Issues

The deadline for ACRs is August 29, 2025. ACRs received regarding "in-cycle" subjects will not be accepted as they are effectively proposals that missed the April 2025 deadline.

The board accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept ACRs only:

- 1) for a fishery conservation purpose or reason; or
- 2) to correct an error in regulation; or
- 3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1)CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

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

2)WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues. 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.

3)WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say? Please consider permanently reducing the amount of State cow 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 2.3000 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;]

4)STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) 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.

b) to correct an error in regulation: N/A

c) 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.

5)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 sustainable 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.

6)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.

7) 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;”

8)STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.). Northern Cook Inlet freshwater sport fishing guide, personal use, sport angler.

9)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

NAME _____

Individual

Address 14660 E Gunnysack Road **City, State.** Palmer, AK **Zip.** 99645

Home Phone. 907-746-2199 **Work Phone.** 907-746-2199. **Email.** fishing@fish4salmon.com

SIGNATURE: Andrew N. Couch _____ **DATE:** 8-29-2025 _____

Note: Addresses and telephone numbers will not be published.

Mail, fax, or upload this completed form to:

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

Fax: 907-465-6094

Upload file online: <https://arcg.is/Kz5ey1>

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

2)WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues. 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.

3)WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say? 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.

4)STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) 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.
b) to correct an error in regulation: N / A
c) 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.
5)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.
6)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.

7) 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.

8)STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

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.

9)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

NAME _____

Individual or Group

14660 E Gunnysack Road _____ Palmer, AK _____ 99645 _____

Address _____ **City, State** _____ **Zip** _____

907-746-2199 _____ 907-746-2199 _____ fishing@fish4salmon.com _____

Home Phone _____ **Work Phone** _____ **Email** _____

SIGNATURE: Andrew N. Couch _____ **DATE: 8-29-2025** _____

Note: Addresses and telephone numbers will not be published.

Mail, fax, or upload this completed form to:

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

Alaska Dept. of Fish & Game, Boards Support Section 907-465-4110

Revised July 2025

Fish and Wildlife Commission

9.25.2025

10 of 13

Fax: 907-465-6094
Upload file online: <https://arcg.is/Kz5ey1>

From: [Alex Strawn](#)
To: [Ashley Stick](#)
Cc: [Lacie Olivier](#)
Subject: Fisheries Language in 2026 State Priorities
Date: Wednesday, September 24, 2025 1:39:48 PM
Attachments: [Alex Strawn.vcf](#)

Good afternoon Ashley,

Below are the two Fisheries items in the 2026 State legislative priorities being considered by the Assembly on October 21. Please distribute this to the FWC so that I can discuss and get feedback.

BOROUGH ACTION PRIORITIES

A. FISHERY MANAGEMENT

- Support collaboration between the State and Federal fisheries management to reduce bycatch.
- Maintain/increase funding and support for fish weirs in the Borough, coho genetic sampling to improve salmon management, and invasive species suppression programs.
- Fully match Federal funds from license fees to maximize Federal dollars for fish and game.
- Maintain the conservation corridor for Northern-bound salmon.
- Ensure adequate ADF&G staffing to efficiently and effectively execute fishery-related programs.
- List Susitna king salmon and Little Susitna coho salmon as stocks of yield concern and develop corresponding management action plans.

BOROUGH FUNDING PRIORITIES:

7. FISHERY PROTECTION - \$2,500,000 (HD 25-30) - In 2015, a strategic Research, Monitoring, and Evaluation Plan for Upper Cook Inlet was conducted, resulting in improved resource management through genetic stock analysis, economic impact studies, and improved funding of Northern District weirs. In 2025, the plan will be a decade old, five years beyond its stated relevant time horizon. Since the last plan, there have been significant declines in salmon populations in the Borough. An update to this plan would provide a list of prioritized goals and strategies that support healthy salmon populations and habitat, and an opportunity for public and agency engagement in guiding strategies for the future.

Additionally, this funding would be utilized to support ongoing work on the Borough's fish passage program, secure more consistent funding and operations of Northern District weirs

and genetic studies, execute pike suppression efforts, resume operation of the Upper Cook Inlet commercial test net fishery, operate a Susitna River Sockeye Salmon mark/recapture abundance estimate, provide an update to the 'Economic Contributions of Sportfishing on the Cook Inlet Region in 2017' study, and ensure additional cataloging of local streams, rivers, and habitat essential for healthy fish and wildlife populations.

Quality fisheries management for Upper Cook Inlet should not only prioritize the procurement of funding for projects but should also ensure adequate staffing to operate and execute the programs efficiently. In a region with such extensive and essential anadromous fish habitat surrounding a rapidly growing population center, and with declining salmon stocks, it is necessary for our region to continue monitoring and investing in tools, data, and information that support healthy local salmon populations and productive Northern Cook Inlet and Mat-Su fisheries.



Alex Strawn

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