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Agenda 8: Nonresponsive Submissions from the 2025/2026 Call for Proposals and Rejected Agenda Change Requests

1. Memorandum on submissions deemed nonresponsive from the 2025/2026 Call for Proposals
 - Appendix with all nonresponsive proposals & rejected ACRs

MEMORANDUM

STATE OF ALASKA DEPARTMENT OF FISH AND GAME Boards Support Section

TO: Alaska Board of Fisheries

DATE: October 19, 2025

THRU:

PHONE: 907-267-2292

FROM: Art Nelson, Executive Director
Alaska Board of Fisheries

SUBJECT: Submissions deemed
nonresponsive from the
2025/2026 Call for Proposals
and Rejected ACRs

Not every proposal submission makes it into the proposal book. Sometimes duplicate proposals are received or the author asks to replace a previously submitted proposal with an updated version (prior to the deadline). Some submissions request regulatory changes that are not within the authority of the board. Other submissions don't actually request a change in regulation but ask the board to take some other non-regulatory action.

When proposals are received, they are assigned a log number. This past year for the 2025/2026 Call for proposals, we received 202 logged submissions (not counting blank submissions). Of those 202, 18 were deemed nonresponsive for a variety of reasons. This memo provides information about those nonresponsive proposals and the main rationale in each case, however some nonresponsive proposals may have multiple reasons.

Figure 1 summarizes the rationale for nonresponsive proposals from the 2025/2026 Call for Proposals. Table 1 lists the nonresponsive proposals by log number, name of submitter, and rationale for nonresponsiveness. Appendix 1 contains all 18 of the nonresponsive submissions.

In addition, there was one Agenda Change Request received that was not included in your ACR packet because it addressed an area/fishery that was in cycle this year and our ACR form clearly states

*ACRs received that regarding "in-cycle" subjects will not be accepted
as they are effectively proposals that missed the April 2025 deadline.*

The ACR that was not accepted is also included at the end of Appendix 1.

Figure 1. Breakdown of Nonresponsive Proposals (18 total).

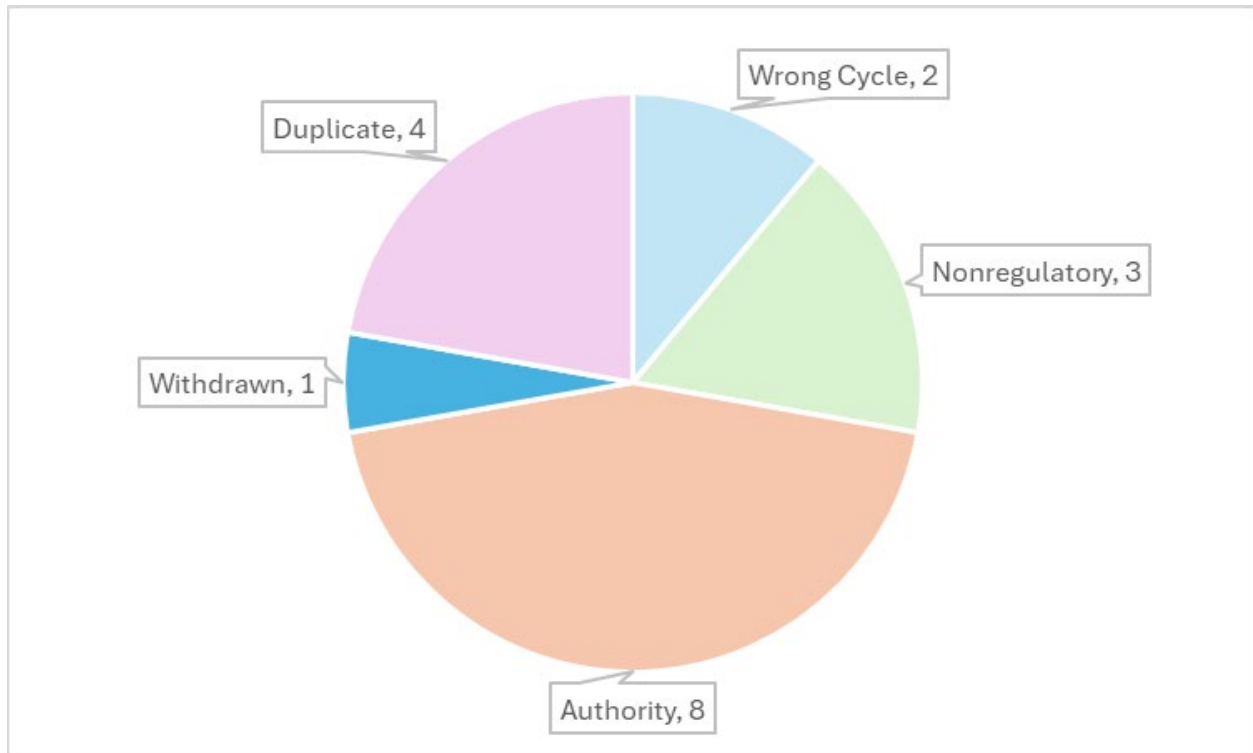


Table 1. List of nonresponsive proposals and rejected Agenda Change Requests, sorted by log number.

	Log #	First	Last	Organization	Area	Reason
1	EF-F26-009	Jacob	Dahlen		UCI	Not in cycle (UCI), and lack of authority
2	EF-F26-010	James	Kearns		Southeast	Not in cycle (SE)
3	EF-F24-017	Tony	Hollis		AYK	Duplicate of EF-F24-019
4	EF-F26-023	Nissa	Pilcher	Western Interior RAC	AK Pen/AI	Outside the board's authority; directs the department to implement GSI study.
5	EF-F26-024	Linda	Kozak	F/V Alaska Trojan	BS/AI	Duplicate to EF-F26-025
6	EF-F26-037	Kent	Anderson		Bristol Bay	Nonregulatory and outside board authority
7	EF-F26-074	Earl	Krygier		Cook Inlet, PWS, AK Pen/AI	Non-regulatory and outside BOF authority to develop sampling plan
8	EF-F26-081	Paul	Warta		Statewide	Board does not have authority to require the department to collect data or establish a new reporting system.
9	EF-F26-087	Rick	Tennyson		Bristol Bay	Nonregulatory. Relates to department assessment program.
10	EF-F26-092	Jason	Ball		Bristol Bay	The board has delegated freshwater and saltwater logbook authority to the commissioner (board finding 2019-294-FB). Additionally, the board cannot require the department to expend funds to administer a logbook program.
11	EF-F26-096	Jay	Watt		AK Pen/AI	Duplicate of EF-F26-103
12	EF-F26-098	David	Luthy		AK Pen/AI	Duplicate of EF-F26-101
13	EF-F26-128	Mark	McNeley	Nelson Lagoon AC	AK Pen/AI	Requiring the department to collect data lies outside the board's authority.
14	EF-F26-138	Jeff	Lucas	Fairbanks AC	Statewide	The board does not have authority to amend 5 AAC 39.130 or to specify how the department reports harvest data.
15	EF-F26-176	William	Dushkin		AK Pen/AI	Board does not have authority to restrict commercial fishing by community of residence.
16	HQ-F26-008	Shannon	Martin	KRSA	Statewide	Attempting to amend a regulation promulgated under commissioner's authority. No board authority to amend this regulation.

-continued-

Table 1. Continued.

17	HQ-F26-019			ADF&G	AYK	Requested withdrawn by author prior to publication
18	HQ-F24-039	Steve	Ramp	Sitka AC	Statewide	Many aspects of the proposal are outside the board's authority, particularly halibut management, and several other aspects of the proposal are nonregulatory requests. Additionally, there is no explicit authority allowing the board to distinguish between users based solely on whether they rent or own a boat.
**	ACR	Michelle	Quillin (+)	TCC, YRITFC, Native Movement	AYK (Yukon)	ACR seeks to address issues that are in cycle (late proposal)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

5 AAC 75.XXX. Susitna River Devil’s Canyon Fishway and Hatchery Enhancement Plan.

(a) The Alaska Department of Fish and Game shall oversee the design, construction, and operation of a 13-mile nature-like fishway in the main channel of the Susitna River at Devil’s Canyon, including 1 mile above and 1 mile below the canyon, to improve fishpassage above Devil’s Canyon for salmon (Chinook, Coho, Sockeye, Chum, Pink) and other species (Arctic Grayling, Rainbow Trout, Dolly Varden, Lake Trout, Whitefish, Burbot, etc.).

(b) The fishway shall include entrances and exits to river tributaries and side channels, supporting passage of 8 million salmon annually above Devil’s Canyon, with 1 million allocated for subsistence harvest and 7 million for spawning escapement, of which 20% (1.4 million) shall be used as broodstock for hatchery production, with the remaining 5.6 million allowed to stray naturally within the Upper Susitna River drainage.

(c) A hatchery facility shall be constructed to release 14 billion fry annually into the mainstream Susitna River, designed for year-round operation including operation during various natural disaster events including but not limited to floods, ice jams, earthquakes, and wildfires, with its own fishway for juvenile release.

(d) The fishway shall accommodate summer navigation by jet boats, float planes, air boats, and barges, and winter travel by snow machines and sled dogs, maintaining safe ice conditions with flowing water beneath.

(e) The Alaska Department of Fish and Game shall oversee salmon escapement in the Upper Susitna River drainage to enable an additional commercial harvest of 5 million salmon across Cook Inlet, Kodiak Island, and the Gulf of Alaska combined, excluding the Susitna River drainage both above and below Devil’s Canyon.

(f) The Alaska Department of Fish and Game shall oversee mitigation measures that address impacts from local third-party mining operations in the Susitna River basin, including but not limited to water quality monitoring, sediment control, and habitat restoration.

(g) The Susitna River drainage from 2 miles below Devil’s Canyon to 2 miles above Devil’s Canyon shall be closed year round to all fishing including but not limited to subsistence, personal use, sport, and commercial fishing including but not limited to all flowing waters, lakes and ponds draining into the Susitna River drainage from 2 miles below Devil’s Canyon to 2 miles above Devil’s Canyon.

(h) The Alaska Department of Fish and Game shall develop a framework for the Devil’s Canyon fishway and hatchery project to support sufficient commercial salmon harvest to recover the estimated \$1.05 billion to \$2.3 billion construction and operation costs over 30 to 85 years.

(i) The Alaska Department of Fish and Game shall use additional revenue streams including but not limited to navigation fees for jet boats, float planes, air boats, and barges in summer, winter travel permits for snow machines and sled dogs, eco-tourism revenue from guided tours and visitor experiences, educational program fees for schools and researchers, ecosystem service credits for carbon sequestration and water quality improvement, public-private partnership investments from the commercial fishing and tourism industries, merchandise sales related to the the Devil's Canyon fishway and hatchery project (e.g., branded apparel), grants from environmental conservation organizations, licensing fees for documentary or media production, fundraising events and donations from community supporters, and government bonds and loans to recover project costs.

(j) The Alaska Department of Fish and Game shall remove or bypass all natural and man made barriers in the Susitna River drainage both in Devil's Canyon itself and in the Susitna River drainage both above and below Devil's Canyon that prevent salmon from reaching suitable spawning or rearing habitat.

(k) , The Susitna River drainage upstream of a marker two miles above Devil's Canyon shall be closed to sport fishing for all salmon year round.

What is the issue you would like the board to address and why? The issue is the significant natural barrier posed by Devil's Canyon on the Susitna River, which restricts salmon migration to spawning habitats in the Upper Susitna River drainage, limiting population growth and sustainable harvest opportunities for commercial and subsistence fisheries in Cook Inlet, Kodiak Island, and the Gulf of Alaska. Current wild salmon populations in the Susitna River drainage above Devil's Canyon are insufficient to support robust fisheries due to limited access to upstream spawning grounds. Without intervention, salmon stocks will remain constrained, reducing fishery yields and impacting subsistence communities. This proposal seeks to enhance fish passage by creating a nature-like fishway, supporting a total return of 13 million salmon annually, with an additional 5 million for commercial harvest in Cook Inlet, Kodiak Island, and the Gulf of Alaska combined and 1 million salmon for subsistence use in the Upper Susitna River drainage, while ensuring 7 million for spawning escapement in the Susitna River drainage above Devil's Canyon. If unchanged, the region risks continued low salmon abundance, undermining economic and cultural needs. Alternatives like smaller-scale fish ladders or hatchery releases alone were rejected due to their inability to address multi-species passage and provide the scale needed for economic recovery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed independently based on extensive theoretical research into fish passage, hatchery operations, and economic viability. I consulted publicly available resources from the Alaska Department of Fish and Game to understand current salmon management in the Susitna River drainage. However, I did not directly collaborate with local Fish and Game Advisory Committees, the Alaska Department of Fish and Game, or any other organizations due to the conceptual nature of this proposal, but I recommend coordination with local Fish and Game Advisory Committees and the Alaska Department of Fish and Game staff to refine regulatory details, assess ecological impacts, and ensure community support.

PROPOSED BY: Jacob Joseph Dahlen

(EF-F26-009)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

I am writing because I have a concern about the number of silver salmon(coho) that are being targeted and taken by non residents in the very small stream and river systems of the Icy Straits, Glacier Bay, and Cross Sound area.

As you may know, the above mentioned area has a number of very small freshwater systems that produce silver salmon. These systems cannot and do not support very large runs, so overfishing can be very damaging to the run. We have an increasing number of non resident sportfishermen who target these small runs. That pressure has reduced the availability of these salmon to the residents who live in the area and depend on these fish for food. And additionally it reduces the brood stock to support a sustainable run of fish. Anecdotely, I was talking to a non resident fisherman in Gustavus who said that he noticed that it was much harder to catch his limit on the salmon river. He noted that he used to be able to catch his limit on the river multiple days quite easily. I suggested that he and his party(usually 5 or 6 persons) were taking 30 to 36 salmon per day and if they did that 3 days per week, they were taking out 90+ fish per week. I noted that perhaps that is why it is harder to do each year. And this is just one system. It is happening all through the area. It is just not right!!!

What is the issue you would like the board to address and why? I am proposing that in the freshwater systems of Icy Straits, Glacier Bay, and Cross Sound, the non resident bag limit be 1 silver salmon per day with an annual limit of 4 fish. This proposal will make sure local residents have enough fish to provide for their food needs and it will support a more robust ocean run of silver salmon in our area. I have seen a reduction of silver salmon in our local streams and rivers. Lets do something to protect these stocks for the future.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: James Kearns

(EF-F26-010)

PROPOSAL XXX

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Insert lead-in language here (“more fish, as follows:”)

Creation of a new subsection in 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

(i)

The Department shall conduct, on an annual basis, a statistically rigorous genetic sampling program of Chum Salmon and use mixed stock analysis to estimate the stock composition and stock-specific harvests of Chum Salmon taken in the June commercial fishery. Results shall be made available to in-season managers of affected stocks as well as to the public.

In addition to this new regulation, during the ongoing study on the stock composition of salmon caught during the South Alaska Peninsula commercial salmon fisheries, the Board of Fisheries should direct the Department that the genetic samples taken during the South Unimak and Shumagin Island fishery are prioritized for processing so that this information is available in-season to both commercial fisheries managers and Yukon and Kuskokwim subsistence managers.

What is the issue you would like the board to address and why? The ongoing lack of Chum Salmon returning to the Yukon and in the Kuskokwim rivers has prevented subsistence users from meeting their subsistence and cultural needs and resulted in empty smokehouses, pantries, and freezers. While multiple factors are responsible for the Chum Salmon declines in Western Alaska, one potential contributor is the interception of these stocks in the South Alaska Peninsula commercial salmon fishery.

This proposal requests the current effort by the Department to examine the genetic makeup of Chum Salmon intercepted in the South Alaska Peninsula commercial salmon fishery be extended indefinitely and be put into and required by regulation.

Doing so will benefit managers, Western Alaska Chum Salmon stocks, and subsistence users. Managers will have the information needed to better understand the stock composition of the fishery and how it changes over time, which in turn, will lead to more informed management decisions. Western Alaska Chum Salmon stocks may be intercepted at lower rates and be better able to recover and meet escapement goals. Healthy Western Alaska Chum Salmon stocks will be better able to support harvest and help subsistence users meet their subsistence and cultural needs.

It is critical this proposal be adopted. Western Alaska Chum Salmon stocks are currently at a level where every salmon counts. The South Alaska Peninsula commercial salmon fishery cannot continue to be executed in a manner that impedes the sustainability of other stocks. Subsistence users cannot continue to bear the brunt of conservation measures.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Western Interior Alaska Subsistence Regional Advisory Council

(EF-F26-023)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

ADFG staff should consult with sport fishing camp operators to get additional feedback on current run status. Many of us have been operating for over 20 years and have a good background on evaluating run strength. Most camps now have Starlink service so communication via phone/text/email is easy.

What is the issue you would like the board to address and why? Inaccurate reporting of chinook salmon numbers at the Portage Creek sonar site. As acknowledged by ADFG staff, especially on years of high sockeye abundance, the chinook salmon counts are hard to determine, which has forced restrictions on the sport anglers due to not meeting escapement numbers. Sport fishing restrictions/closures are very damaging on our businesses, with many past clients uneasy about rebooking for a future trip.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Proposal is submitted by myself as a suggestion for an additional tool to be used by ADFG for determining king salmon abundance.

PROPOSED BY: Kent Anderson, owner Alaska Salmon Camp Inc

(EF-F26-037)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

It would not be a regulation, rather a BOF public process to engage concerned public on development of a GSI sampling plan to assess chinook stock makeup within various sport and commercial fisheries.

What is the issue you would like the board to address and why?

Sec. 16.05.050 (4)

Proposal to institute Genetic Stock Identification (GSI) testing of catch and discard of Chinook salmon from all saltwater regulatory areas within the state of Alaska for Sport and Commercial salmon fisheries. These include Cook Inlet, PWS, Bristol Bay Areas K, L, and M. Samples will be (randomly) taken at recreational boat landings, seafood processing plants, and commercial fishery tenders to more suitably determine the impacts of sport and commercial fleets.

Justification: In the 1980s, when Chinook stocks were locally abundant and appeared to be healthy, density-independent mortality was at play, and such mortality was not impeding sustainability. Therefore, unintended harvest, discards, and high levels of predation were mostly not a management concern (though sharing fish across national borders already was). But today, other than a few naturally spawning chinook streams, meeting and maintaining minimum escapement goals is an ongoing concern. Each chinook not returning to its home stream to spawn contributes to the density-dependent mortality impact and challenges stock survival and sustainability. Because now, each fish really does matter. Identification and assessment of all human-induced mortality must be determined so that management measures can be incorporated into all fishery harvest activity that may reduce fishery impacts on all coast-wide stocks of Chinook. While the ADFG has proposed a Chinook WASSIP study if Legislative funds become available, funds are not assured. Therefore, I ask that the BOF add its’ stature and influence to ADFG’s in seeking funding and request public input to this process through a BOF evaluation and recommendation to ensure that the public is fully engaged in this evaluation of fishery impacts on our critical chinook stocks.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed this idea with many sport and commercial users while attending different BOF and other fishery meetings this past year.

PROPOSED BY: Earl Krygier

(EF-F26-074)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

Proposal: Require ADFG to gather annual King salmon harvest recorded on fishing licenses and king salmon harvest report cards.

Alternatively,

Establish a new permit and reporting system for king salmon harvest.

What is the issue you would like the board to address and why? Issue: The department has consistently struggled to obtain accurate and complete information regarding sport fishery participation and harvest. Creel sampling and the Sport fishing survey provide useful data, but are unable to be used in real time, and do not provide sufficient data for management. Personal use fisheries have avoided this issue by requiring area specific permits and timely reporting. Hunting opportunities are also governed in a similar manner. These permitting processes require additional effort from the participants, but are necessary for timely and effective management.

The state has so far avoided implementing a similar restriction on sport anglers, but the current decline of Chinook Salmon warrants a more intensive management. Requiring reporting of recorded harvest, or establishing a permit and reporting system similar to the general harvest permits for game species would enable the department to make real time adjustments to harvest of Chinook Salmon. This will require a certain amount of effort on the part of the sport fishery for reporting catch, but will drastically improve knowledge about the fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Paul Warta

(EF-F26-081)

PROPOSAL XXX

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

Insert lead-in language here (“more fish, as follows:”)

The Board of Fish adopted the King Salmon Stock of Concern regulation with the assumption that there would be accurate salmon counting. I would look to the boards wisdom and support to make this issue a top priority item for the State of Alaska to resolve.

What is the issue you would like the board to address and why?

Inaccurate counting of migrating salmon on the Nushagak River Portage Creek sonar.

King Salmon in the Nushagak River is a stock of concern. Which is noticeable in the subsistence catch, incidental commercial harvest and escapement.

If the Nushagak River sockeye were accurately counted, the 6 percent Nushagak River trigger could be reached sooner, resulting in quicker fishing time for fishers.

If the salmon were accurately counted it has the potential of the king salmon meeting or exceeding the escapement goals for the past two seasons, 2023 & 2024.

If the king salmon are reaching their escapement goal, the fishery can come out of the king salmon stock of concern management plan.

The Nushagak River has been blessed with recent strong sockeye returns. When large schools of salmon go past the sonar close to shore, they block the sonar beam from counting salmon swimming further offshore, resulting in less salmon being counted.

Salmon are counted at two places on the Nushagak River, down river at the Portage Creek sonar and upriver at the Nuyakuk tower.

Historically Portage Creek counts hypothetically 100 percent of migrating salmon and Nuyakuk counts about 45 percent (average difference in counts 1980-2006) of what Portage Creek counts. The 55 percent difference is fish migrating to different tributaries along their journey up Nushagak River, before reaching the Nuyakuk tower.

However, the past two seasons 2023 and 2024 Portage Creek has hypothetically counted 100 percent and Nuyakuk tower 132 percent of what Portage Creek sonar has counted. (In 2023 Portage Creek Sonar 1,772,675 and Nuyakuk tower 2,303,748 or 129 percent of Portage Creek. In 2024 Portage Creek sonar 1,708,121 and Nuyakuk tower 2,317,050 or 135 percent of Portage Creek counts.)

As the salmon are migrating upriver the sonar crew is sampling the salmon for species identification, which is turned into a percentage against the total number of salmon migrating up stream counted by the Portage Creek Sonar. Resulting in a sockeye, chum and king salmon escapement number.

If you were to take the counting error Nuyakuk tower counts multiplied by the 87 percent counting error to get a Portage Creek sonar count. Then take that number multiplied by the species percentage. The result is close to or exceeding the King Salmon escapement goal, mathematically. If the counts were more accurate, the 2023 and 2024 king salmon escapement number could potentially be in the record books as meeting escapement goal vs not meeting escapement goal. With more accurate salmon counts the biologists could better manage the commercial and sport fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I developed this proposal with help from my family who are all Bristol Bay fishers.

PROPOSED BY: Rick Tennyson

(EF-F26-087)

PROPOSAL XXX

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

Insert lead-in language here (“more fish, as follows:”)

Reinstate the Freshwater Sport Fish Guide Logbook as it was originally worded in 5 AAC 75.076(a) with the exception being that it is specific for required for the Nushagak Drainage/River of the Bristol Bay Area.

What is the issue you would like the board to address and why? Reinstate the previously required State Freshwater Sport Fish Guide Logbook (FSFGL) regulation for the Bristol Bay/Nushagak Drainage.

In 2022, Chinook were listed as a species of conservation concern and a specific King Salmon Conservation Management plan was adopted in 2023. This new conservation status highlights the necessity of accurate harvest enumeration. This is especially true, when estimates for in river escapement of king salmon are very poor and creel studies/data are limited in area and scope. With the in season estimates by ADF&G for king salmon escapement being so poor, all attempts should be made by all user groups for more accurate reporting to have the best in season and future data possible.

The FSFGL was abolished in 2018 across the state of Alaska. However, this was a critical tool for ADF&G and AWT and is necessary data. Current estimates by ADF&G are taken daily from Black Point to Ekwok, however much of the Nushagak River is not surveyed. It is hard to establish or estimate how many anglers are sport fishing for king salmon. Additionally, any reporting for harvest of king salmon is voluntary. This significantly limits the number of participants and the accuracy of the data for king salmon kept, king salmon caught and not kept, as well as size of king salmon. These numbers are important data for the future, as well as for in season management. Additionally, sport fishing activity for king salmon harvested below the sonar station, should be regulated to require daily reporting to ADF&G to help determine in season king salmon run strength.

With the current designation for a stock of concern for king salmon, the large amount of foregone harvest over previous SEG goals, and the large number of king salmon stamps issued, this logbook program should be required in Bristol Bay. If the Saltwater Sportfish Guide Logbook is still required and is effective, then the FSFGL seems important for a stock of concern in Bristol Bay, considering the large economic consequences to this region. The FSFGL is an important AWT tool for enforcement and it provides the ability for enforceable action.

As a retired Alaska Wildlife Trooper, I served 8 years in the Bristol Bay Commerical/Sportfish Enforcement Plan. In addition to the Bristol Bay programs, I was posted/assigned to both Kodiak and Dutch Harbor where I primarily enforced Commercial Fisheries and Sport Fisheries throughout nearly all coastal waters of Alaska. During my time with AWT the Freshwater Sport Fish Guide logbooks were a very critical tool and provided ADF&G with critical data and assisted with management.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Discussed the issue with local law enforcement and several other user groups about this issue and it is clear that more data is needed for sport fish users.

PROPOSED BY: Jason Ball

(EF-F26-092)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

Require that Northern Alaska Peninsula Coho commercial fishermen report their steelhead bycatch.

What is the issue you would like the board to address and why? Decreasing number and size of steelhead in the Sandy River over the last 10 years.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. With anglers who have been fishing the Sandy River for the last 10+ years.

PROPOSED BY: Jay Michael Watt

(EF-F26-096)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

Require that Northern Alaska Peninsula Coho commercial fishermen report their steelhead bycatch.

What is the issue you would like the board to address and why? Decreasing number and size of steelhead in the Sandy River over the last 10 years.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. With anglers who have been fishing the Sandy River for the last 10+ years.

PROPOSED BY: David Luthy

(EF-F26-098)

PROPOSAL XXX

5 AAC 72.xxx. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

I would like to see it mandatory (Lawful) to report All Interactions of Chinook Salmon passing thru All of Area M harvestable waters. Possibly thru the ADFnG App.

https://www.adfg.alaska.gov/index.cfm?adfg=home.mobile_app

What is the issue you would like the board to address and why?

No comprehensive Chinook Management Plan for Area M Chinook Salmon.

I have learned from ADFnG staff that a management plan can not be achieved due to lack of data. I also learned that only sparse voluntary data is only now available due to the termination of “Fresh Water Log Book Program” (2017?). I have learned that the ADFnG has an up and running app to aid in reporting **All Interactions** by **All User Groups** catching Chinook Salmon, i.e. Subsistence, Commercial and Sports Fishing of Salmon.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No, it is abundantly clear that the lack of data willnever allow for the achievement of a Chinook Management Plan for Area M.

PROPOSED BY: Mark McNeley

(EF-F26-128)

PROPOSAL XXX

5 AAC 39.130. Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels; transporting requirements.

Insert lead-in language here (“more fish, as follows:”)

Require “Personal Use” (“Home Pack”) harvests on seine and drift gillnet commercial salmon fish tickets to be weighed and recorded by weight and species by a tender or processor and to be included in ADF&G harvest reports in an “unsold” category. (Set nets to be excluded from weighing because of how set net deliveries are made, leaving home packs on the ground at a site, thus not being able to be weighed; but noted fish ticket weights should be recorded in harvest records.)

Add language to 5 AAC 39.130 (12) as follows:

5 AAC 39.130. Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels; transporting requirements.

(12) the number or pounds of fish by species retained by a commercial fisherman for that person's own use, if applicable. **All personal use (unsold) commercial harvest for seine and drift gillnet shall be weighed and recorded by species and number of fish when delivering fish to be sold; All recorded Personal Use fish must be included in ADF&G harvest records.**

In addition, it is recommended that the fish ticket category “Personal Use” should simply be changed to “Unsold” as to not confuse with Alaska’s legal definition of Personal Use.

What is the issue you would like the board to address and why? On the ADF&G salmon commercial harvest fish tickets, there is a section at the bottom to enter “personal use” (usually referred to as “home pack”). These are fish that commercially permitted salmon harvesters may legally take during a commercial opener to bring home or sell to another registered buyer. These fish are considered “unsold” if part of an initial delivery and therefore not part of the COAR (Commercial Operator’s Annual Report) unless sold to another registered buyer subject to the annual reporting.

The critical issue is that personal use (unsold) harvest is a voluntary reporting and rarely verified by weight and species and is not enumerated in harvest reports by ADF&G. This practice has been allowed since the beginning of the Limited Entry Act in 1972 but results in severe under-reporting of harvests of critical species, such as Chinook.

NOTE:

“Personal Use” on a commercial harvest fish ticket should not be confused with “personal use” in sports fishing, which is restricted to Alaska residents only. Personal Use take on a commercial vessel can be non-resident.

Recognizing that in a single opener a fisherman may deliver several times to a tender or processor and may have a cumulative “home pack” across several deliveries, and recognizing the space limitations in many boats to put home pack fish aside, there needs to be a fixed way that “home

pack” weights can be established. One suggestion is to have a separate brailer bag for home pack fish to be weighed vs. those that have been weighed. Most fishermen will take home packs from their last delivery so this should not be a significant issue.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. YES - Several AYK ACs and tribal coalitions. The Fairbanks Fish & Game Advisory Committee met on April 9th, 2025 and voted unanimously to submit this proposal.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee Jeff Lucas, Chair
(EF-F26-138)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

As for a solution i would recommend that to fish in Area M for the month of June you would have to have a Vessel or a Permit Holder FROM the area that they are fishing.

What is the issue you would like the board to address and why? The main issue that i would like to see changed and i feel that i speak on behalf of the people throughout the Area M Native Communities, is the fishing time and restrictions enforced by the ADF&G in the Area M reago. I am 42 years old and have been actively fishing all throughout Area M with my father since i was 4, and now i have my son fishing with me and i would like to see him give the operation to his son one day. We have been fighting this fight for as long as i could remember so lets just say the last 40 years and surprise surprise it has gotten worse. As for the reason **why** i would like to see attempt to address this issue is because Area M is scattered with “Ghost Towns” and if we don’t have REAL change i am afraid that the remaining community’s in the Area M reagon will meat the same fate. I would also like to see ADF&G KEEP TO A SET SCHEDUL, we already have our June season slashed in half right out of the gate, then when we finally get to go fishing we have to listen to the radio constantly because an emergency closure might come across the airwaves and some might not hear it.

I would like to see a solution similar to what Washington State has done with their Dungenes Crab fisheries, where the Native/Local fleet could go out and fish for a set period of time before everyone else’s gear cold even hit the water, I would like to see the Area M June fishery to have a regulation similar to that. If not the whole month of June then at least a percentage of the openers. If you consider what we are being punished for and why, if we cut it down to more of a Local/Native fisheries JUST FOR THE MONTH OF JUNE that would cut the fleet down and the Majority of the big capes that “intercept Chum/Sockeye Salmon” wouldn’t have as many obstacles to get where they are going.

On a bigger scale the loss of all of our community’s throughout the reagon would be a disaster, King Cove, Sand Point, Cold Bay, False Pass etc have been punished due to the decades long fight we have been in and if anything it has gotten worse. This might be the farthest thing from a solution but it is a start, because after another 30/40 years of this there wont be anyone left to fight and maybe thats the endgame.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Talked with a few people and something has to change because like i had said what we have been doing is not working

PROPOSED BY: William Dushkin

(EF-F26-176)

PROPOSAL XXX

5 AAC 40.310 Regional Planning Team Composition.

Adds a member to each regional planning team.

Expand representation of Regional Planning Teams for salmon hatcheries to include one additional “at-large” member in order to foster broader public participation and provide independent perspectives on hatchery programs and plans:

5 AAC 40.310. Regional planning team composition.

(a) Each regional planning team consists of [SIX] seven members. Three are department personnel appointed by the commissioner, one public member appointed by the commissioner, and three are appointed by the board of directors of the appropriate regional aquaculture association, qualified under AS 16.10.380. The public member will be selected based on interest, experience or expertise in salmon hatchery management or science.

(b) The commissioner will, in his or her discretion, request the involvement of representatives of federal and state agencies to assist a regional planning team if their contribution will aid in the development of the regional comprehensive plan.

What is the issue you would like the board to address and why? Regional planning teams (RPTs) are established for the primary purpose of developing

comprehensive salmon plans for various regions of the state [5 AAC 40.300]. Comprehensive management plans guide efforts to rehabilitate natural stocks and supplement natural production, with provisions for both public and private nonprofit hatcheries [5 AAC 40.340]. RPTs currently include representatives from the department and regional aquaculture associations. Planning team meetings are open to members of the public and subject to public notice requirements [5 AAC 40.350]. Public involvement in the planning process is encouraged [5 AAC 40.360]. However, planning teams do not include public representatives.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Not applicable

PROPOSED BY: Kenai River Sportfishing Association

(EF-F26-008)

PROPOSAL XXX

5 AAC 73.010. Seasons, bag, possession, and size limits, and methods and means for the Yukon River Area.

Prohibit the use of spear or bow and arrow as sportfishing gear in the Dall and Little Dall River drainages, as follows:

5 AAC 73.010(d)(1) is amended by adding a new sub-paragraph to read:

...

- (1) in the Dall River and Little Dall River drainages,
 - (A) only unbaited, single-hook, artificial lures may be used;
 - (B) the use of set lines is prohibited;
 - (C) the use of a spear or bow and arrow is prohibited;**

What is the issue you would like the board to address and why? The sport fishery for northern pike in the Dall and Little Dall Rivers is managed under special regulations that restrict sport fishing through a limited open season and fish size. Specifically, in all waters of the Dall River drainage and in all waters of the Little Dall River drainage, northern pike may be taken only from May 20 through September 30, with a bag and possession limit of four fish less than 30 inches in length and only one fish which may be 48 inches or greater in length; all northern pike caught that are at least 30 inches, but less than 48 inches in length, may not be possessed or retained and must be immediately released.

The issue is that the use of spear or bow and arrow gear are incompatible with the current slot-length limit because it is not possible to release fish using lethal gear after the bag limit has been achieved or if fish taken are within the protected slot-length limit. In addition, it may be difficult to visually determine the length of the fish before utilizing spear and bow and arrow gear, potentially leading to an angler harvesting a fish within the protected slot-length limit of 30 to 48 inches. Therefore, to allow sport anglers to release northern pike within the protected slot-length limit, it is recommended that the use of spear and bow and arrow gear be prohibited.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-019)

PROPOSAL XXX

5 AAC 00.000. Regulatory Language here.

Insert lead-in language here (“more fish, as follows:”)

The Sitka Fish and Game Advisory Committee requests the Board take the following actions:

1. Require the Department to accept the following definitions in their management of sport fishing activities on the Marine Waters of Alaska:

A. Rented Sport Fishing Vessel - Means any State Registered or US Documented power-driven vessel which is leased, rented or chartered to another by the owner (or “Livery”) for consideration for the purpose of sport fishing in the marine waters of Southeast Alaska. Rented Sport Fishing Vessels include both Livery Vessels and Bare Boat Charters.

B. Livery - means a person who advertises and offers a livery vessel for use by another in exchange for any type of consideration when such person does not also provide the lessee or renter with a captain, a crew, or any type of staff or personnel to operate, oversee, maintain, or manage the vessel.

C. Bareboat Charter – means an arrangement for the chartering or hiring of a ship or boat for which no crew or provisions are included as part of the agreement.

2. Encourage the Department to require any persons who own (Livery) Rented Sport Fishing Vessels to register their vessel(s) as such with the Department and to display a Department provided “Rented Sport Fishing Vessel Decal” (similar to but visibly different from the current Charter Vessel Decal)

3. Encourage the Department to amend both their dockside creel census and off-season mail out survey processes to provide a “Rented Sport Fishing Vessel” category so that the harvest data for this group can be broken out and shared with the NPFMC.

4. Enter into discussions with the NPFMC asking them to:

A) Start using the above definitions in their management of Sport Caught Halibut in Area 2C.

B) Start treating Unguided Anglers fishing from a “Rented Sport Fishing Vessel” as a separate user group when making management decisions for Sport Halibut Harvest.

C) Start requiring Unguided Anglers fishing from a “Rented Sport Fishing Vessel” to log their Halibut harvests. The person to be held responsible for submitting the catch logs shall be the person who signed the Rental/Livery/Bareboat Charter agreement.

D) Start registering Rented Sport Fishing Vessels targeting Halibut, similar to the registration requirements for Charter Vessels.

E) Require anglers sport fishing for Halibut from Rented Sport Fishing Vessels to follow the same daily bag/possession/size limits and day closures as those prescribed for Guided Anglers.

What is the issue you would like the board to address and why? The Sitka Fish and Game Advisory Committee (AC) has been working for over the last four years to convince fisheries managers at both the North Pacific Fisheries Management Council (the Council), the Alaska Board of Fisheries (the Board) and the Alaska Department of Fish and Game (the Department), to take some action regarding a fairly new, large and rapidly expanding user group of Halibut harvesters, the Unguided Rental Boat/Bare Boat Charter Anglers within Halibut Management Area 2C. The issue at hand is this rapidly growing user group is taking advantage of the more generous daily Halibut bag limit of two fish of any size per day versus the more restrictive Guided Angler bag limit of one fish per day that falls within a strict “reverse slot limit”.

The history of our efforts on this issue includes:

A. We submitted two proposals for the Board’s 2020/2021 Southeast & Yakutat Finfish & Shellfish cycle of meetings and no action was taken.

B. We submitted another proposal on this issue for the Board’s 2024/2025 Southeast Cycle and the Board’s Admin Support personnel chose to not accept the Proposal for the Board’s deliberations in their Jan/Feb 2025 meetings, citing problems with the Board’s authority to perform the requested actions in the proposal.

C. Members of our AC submitted written comments and testified at the Council’s 2022, 2023, 2024 meetings and at the 2022 and 2023 October & December meetings of the Council’s Charter Halibut Committee. No action has been taken or promised on this issue. In our discussions with the Council, we have been informed that the Council is unlikely to take any action to quantify and/or reduce harvest of the Unguided Rental Vessel/Bareboat Charter user group unless they receive a request to do so from the State of Alaska.

D. We have asked both the Department and the Council to break out harvest data for the user group in question but have been told by both that neither group has been able to come up with an acceptable definition of “Rental Vessel” in order to provide the requested data. We were also told that there are basically insurmountable challenges in breaking out the harvest data for this particular user group of anglers.

E. Within just a short two-week period in the fall of 2023, Sitka’s State House Representative’s staff was able to obtain and evaluate data from the Alaska Department of Motor Vehicles on how many vessel registrations in Alaska State House District 2 using the number of vessel registrations listing “Rental” as their primary use. Her staff’s analysis of this data shows that the number of these vessels has nearly doubled between 2001 and 2023. District 2 includes all the communities of Southeast Alaska with the exception of Ketchikan, Juneau, Haines, Skagway and Gustavus. If vessels from these communities were added, it would likely show even greater growth in the Rental Vessel sector within Federal Management Area 2C.

F. In August of last year, our AC's Chair, Vice Chair and Resident Sportfish Seat met electronically with the Commissioner on this issue at his request. He shared his concerns with this growing user group the harm they may be causing to our Halibut resources. He shared that he is fairly limited in what he can do without an accepted definition of just what an Unguided Rental Vessel is so that harvest data can be obtained. In further discussions with the Commissioner's Staff, they have recommended we submit a new Proposal to the next Statewide Finfish BOF cycle. As a result of this recommendation, we are submitting this Proposal.

In times of low abundance for our Halibut resources (like we are now experiencing), our AC would prefer to lower the harvest of the Unguided Rental Vessel/Bareboat Charter Sportfishing Anglers (who are primarily non-residents) rather than lowering the bag limit for the remainder of the Unguided Anglers in Area 2C (who are primarily Alaska residents). If this action is approved, but fails over a reasonable timeframe to have a meaningful impact to increase the health of our Halibut resources, then our AC would likely support a reduction in sport bag limits for all Unguided Anglers.

Our AC fully understands the challenges the Board faces when dealing with Proposals that deal with a federally managed species like Halibut. We also fully understand the difficulties in having federal managers allocate resources between Guided and Unguided Anglers whereas the State of Alaska allocates resources between Resident and Non-Resident Anglers. We are also highly confident in our concern that a serious resource removal problem exists and that it is time to engage on efforts to both quantify the Harvest by Unguided Rental Vessel/Bareboat Charter Sportfishing Anglers and to create parity in bag limits between them and Guided Anglers.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The Sitka AC has discussed this issue with the Department, the NPFMC, the SE RAC and members of several other Advisory Committees.

PROPOSED BY: The Sitka Fish and Game Advisory Committee (HQ-F26-039)

AGENDA CHANGE REQUEST FORM

ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) reviews each state managed fishery under its authority once every three years in what is referred to as the board’s “three-year cycle”. Each year the board takes up regulatory subjects from a consistent set of regions and species, repeating every three years. Regulatory subjects in the current meeting cycle are referred to as “in-cycle” subjects.

The board recognizes there are times when “out-of-cycle” subjects require more immediate attention and created the “agenda change request” (ACR) process to allow consideration of these subjects. The board solicits ACRs 60 days prior to its fall work session. Accepted ACRs are scheduled at a subsequent meeting during the current meeting cycle. More information on the board’s long-term meeting cycle is [here](#).

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 accepts 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:

5 AAC 39.222 – Policy for the Management of Sustainable Salmon Fisheries

5 AAC 05.360 – Yukon River King Salmon Management Plan

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

The problem this Agenda Change Request seeks to address is the chronic biological failure and regulatory inadequacy in the management of Yukon River Chinook salmon. Despite years of increasingly restrictive measures—including full closures of subsistence, commercial, and sport fisheries—the stock continues to decline and remains classified only as a Stock of Yield Concern, despite meeting the criteria for a Stock of Conservation Concern under 5 AAC 39.222.

Yukon Chinook have failed to meet escapement goals for five consecutive years (2020–2024), including the Canada Interim Management Escapement Goal (IMEG) of 42,500–55,000 fish. Tributary goals (e.g., Chena, Salcha, Anvik) have also been consistently missed. Subsistence harvests have collapsed to record lows—just 1,827 fish in 2022, far below the Amount Necessary for Subsistence (ANS) of 45,500–66,704. This failure violates AS 16.05.258, which requires subsistence use be prioritized when no surplus exists

Biological indicators show a reproductive collapse, with age, sex, and length data revealing a loss of older, larger, more fecund females. Recruits-per-spawner ratios have dropped below 0.5, well under the replacement level of 1.0 (Jallen et al. 2022). Studies confirm that smaller fish produce up to 35% fewer eggs, and large-mesh gillnets disproportionately remove the most fertile females.

The State has exhausted its management tools—closures, mesh restrictions, selective gear mandates, and emergency orders—yet the stock continues to decline. Federal disaster declarations have been issued for 2020–2024, confirming the severity of the crisis.

Genetic evidence has added a critical dimension to understanding the decline of Yukon Chinook. A 2014 ADF&G stock composition analysis found that 20.5% of Chinook salmon harvested in the South Peninsula and Chignik Management Areas originated from Western Interior Alaska (WIAK), including Yukon-bound fish. Previously underutilized data from an appendix, these findings provide clear evidence of mixed-stock marine interception. When applied to cumulative Chinook harvests in Area M over the past decade—estimated at approximately 248,000 fish—this suggests that around 51,000 WIAK-bound Chinook may have been intercepted in commercial fisheries, highlighting a significant and previously underrecognized pressure on already vulnerable river systems (ADF&G 2014; NMFS 2024 Draft EIS).

Without action during this work session, the next review may not occur until 2028, risking further biological collapse and deepening hardship for Alaskan communities. Federal disaster declarations (2020–2024) already affirm the severity of this collapse. This request is conservation-driven, not allocative; it seeks only to align regulation with biological reality, prevent further social and ecological harm, and restore equitable, science-based management of this vital stock.”

3) WHAT SOLUTION DO YOU PREFER?

We respectfully request that the Alaska Board of Fisheries take the following actions:

1. Reclassify Yukon River Chinook salmon as a Stock of Conservation Concern under 5 AAC 39.222. This designation would formally recognize the chronic biological decline of the stock and trigger a structured review of management strategies, including escapement performance, harvest impacts, and conservation measures.
2. Amend 5 AAC 05.360 (Yukon River King Salmon Management Plan) to reflect the new conservation status and incorporate the following provisions:
 - Conservation and subsistence priority: Ensure that all management decisions prioritize conservation and uphold the statutory priority for subsistence use.
 - Mixed-stock harvest restrictions: Limit commercial harvest of AYK-bound Chinook salmon in mixed-stock fisheries (e.g., Area M) when no harvestable surplus exists for subsistence users in the AYK region.
 - Transparency in data reporting: Require public reporting of Age, Sex, and Length (ASL) and Genetic Stock Identification (GSI) data for Chinook salmon harvested in Area M, with specific breakdowns for AYK-bound stocks, including Yukon-origin fish.
 - Regulatory review of Area M fisheries: Initiate a formal review of Chinook harvest management in Area M to ensure interception levels are consistent with the conservation status of AYK stocks.

These actions will help align fisheries management with Alaska's constitutional mandate for sustained yield, the statutory priority of subsistence use, and the ethical responsibility to protect vulnerable salmon populations and the communities that depend on them.

Proposed Amendment to 5 AAC 05.360 – Yukon River King Salmon Management Plan

Add new subsection:

(g) Conservation Concern Designation and Adaptive Management Measures

1. The department shall designate Yukon River Chinook salmon as a Stock of Conservation Concern under 5 AAC 39.222, based on chronic failure to meet escapement goals and sustained escapement thresholds, despite the implementation of restrictive management measures.
2. Upon designation, the department shall implement the following adaptive management actions to support stock recovery and uphold the statutory priority for subsistence use:
 - (A) Prioritize conservation and subsistence access in all management decisions affecting Yukon River Chinook salmon, consistent with AS 16.05.258 and the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222).
 - (B) Conduct a formal review of mixed-stock fishery impacts, including Chinook harvests in the South Alaska Peninsula (Area M), to evaluate alignment with the conservation status of Arctic-Yukon-Kuskokwim (AYK) stocks.
 - (C) Improve transparency and public access to data by publishing Age, Sex, and Length (ASL) and Genetic Stock Identification (GSI) data for Chinook salmon harvested in Area M, with specific identification of AYK-bound stocks, including Yukon-origin fish.
 - (D) When genetic data and in-season assessments confirm interception of AYK-bound Chinook salmon in mixed-stock fisheries, and no harvestable surplus exists for subsistence users in the AYK region, the department shall implement appropriate management responses. These may include time-area closures, gear modifications, and other conservation measures within existing regulatory authority to ensure escapement and conservation objectives are met.
3. The department shall initiate and maintain early, continuous, and substantive consultation with affected communities, Tribal governments and organizations, and relevant federal partners to support coordinated conservation efforts. Decision-making must be guided by both rigorous scientific data and Indigenous Traditional Knowledge to ensure culturally informed and ecologically sound outcomes.

The Alaska Boards of Fisheries and Game, alongside the Department of Fish and Game, are bound by the same government-to-government consultation obligations outlined in the 2002 ADF&G policy. This shared responsibility underscores the importance of timely, culturally sensitive, and meaningful engagement with federally recognized tribes throughout the regulatory process.

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:

Yes. The ACR addresses chronic escapement failures, reproductive collapse, and marine interception of Yukon-origin Chinook. It seeks to protect the long-term sustainability of the stock and uphold Alaska's constitutional mandate for sustained yield.

b) to correct an error in regulation:

Yes. The current classification as a Stock of Yield Concern is outdated and insufficient given the severity of biological decline and lack of harvestable surplus. The regulation fails to reflect the stock's true conservation status.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted: Yes. Genetic data confirms significant interception of AYK-bound Chinook in Area M fisheries—an impact not fully understood or addressed when current regulations were adopted (ADF&G 2014 Mixed Stock Analysis; NMFS 2024 DEIS).
5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE? If this problem is not addressed during the current work session, the next opportunity for formal review may not occur until 2028. Continued inaction will exacerbate biological decline. Yukon River Chinook salmon have failed to meet escapement goals for five consecutive years. Without intervention, the stock may reach irreversible thresholds, jeopardizing its ability to sustain itself. Communities along the Yukon River have faced record-low harvests, with only 1,827 Chinook harvested in 2022—far below the Amount Necessary for Subsistence (ANS) of 45,500–66,704. Delaying action perpetuates food insecurity, detrimental health consequences, cultural loss and erosion of traditional practices. Undermining in-river conservation efforts across the AYK region, genetic data confirms that AYK-bound Chinook are being intercepted in marine fisheries, yet no regulatory response has been initiated. Without timely review, interception will continue unchecked. Subsistence users face full closures while offshore fisheries intercept tens of thousands of AYK-origin Chinook annually. This imbalance erodes trust in the regulatory process and violates Alaska’s statutory priority for subsistence use.
6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. This ACR is conservation-driven and based on biological criteria outlined in 5 AAC 39.222. It seeks to reclassify Yukon River Chinook salmon as a Stock of Conservation Concern due to compounding factors, despite the exhausted management tools deployed in the Yukon River, escapement goals have not been met since 2020. The Canada Border Passage was 12,025, far below the required 42,500-55,000. The primary intent is to protect the long-term sustainability of the stock and ensure that Alaska’s statutory priority for subsistence use is upheld. While allocation may be indirectly affected, the request does not propose a redistribution of harvest among user groups. Instead, it calls for a data-informed review of existing management measures and reporting practices to ensure that conservation and subsistence priorities are adequately reflected in future management and regulations. The proposal is grounded in biological information and longstanding conservation principles—not in allocative intent.
7) 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.
8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.) This ACR is submitted by the Tanana Chiefs Conference, Yukon River Intertribal Fish Commission, and Native Movement. Please review the attached Supplemental Document to support this ACR. These entities represent Alaska Native Tribal governments and Indigenous organizations exercising their inherent sovereignty and self-governance. Their involvement in the Yukon River fishery is grounded in millennia of stewardship, cultural responsibility, and legal authority. The Yukon River Inter-Tribal Fish Commission (YRITFC) was established through formal tribal resolutions passed by its member Tribes, authorizing Fish Commissioners to represent their sovereign nations in fisheries management. The Tanana Chiefs Conference (TCC) has similarly

passed resolutions affirming the need to protect Yukon River salmon and uphold Indigenous food security.

This proposal reflects a unified effort by sovereign tribal nations and allied organizations to protect salmon for the benefit of all Alaskans. Healthy salmon populations are vital not only to Indigenous communities, but also to the ecological integrity, cultural heritage, and economic sustainability of the entire state. This ACR seeks to ensure that fisheries management is equitable, science-based, and inclusive of all voices committed to long-term conservation.

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.

ADF&G reassessed Yukon Chinook stocks in 2023 and confirmed chronic escapement failures. Directed Chinook fisheries have been suspended through 2030 (ADF&G–DFO 2024–2030). This proposal builds on prior discussions and introduces data from 2014 not previously considered.

Submitted by:

NAME Tanana Chiefs Conference, Yukon River Inter-Tribal Fish Commission, Native Movement

Individual or Group

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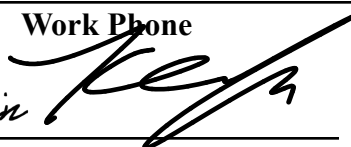
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SIGNATURE:

Michelle Quillin 

DATE: 08/29/2025

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Note: Addresses and telephone numbers will not be published.

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