

MATANUSKA-SUSITNA BOROUGH Fish & Wildlife Commission

350 E Dahlia Ave., Palmer, Alaska 99645

CHAIRPERSON

Andy Couch

VICE CHAIR

Pete Probasco

MSB STAFF

Maija DiSalvo



BOARD MEMBERS

Howard Delo

Larry Engel

Tim Hale

Gabe Kitter

Bill Gamble

Kendra Zamzow

Ex officio: Jim Sykes

Regular Meeting

January 30, 2024

[Supplemental Handout – Table of Contents](#)

- 1 = Final Draft BOF comments
- 19 = MSB Island Lake float plane base comments
- 23 = Central District Drift Plan VS. Federal EEZ Plan
- 25 = Letter to Chairman John Wood, Alaska BOF

Physical Location of Meeting: Conference Room 203,
DSJ Bldg, Palmer. Remote Participation: See agenda.

Planning and Land Use Department - Planning Division

<http://www.matsugov.us> • planning@matsugov.us

To: Alaska Board of Fisheries

From: Matanuska-Susitna Borough Fish and Wildlife Commission

Date: January 30, 2024

Re: Comments on 2024 Upper Cook Inlet Finfish Proposals

I. Preamble

The following comments are submitted on behalf of the Matanuska-Susitna Borough's Fish and Wildlife Commission. Proposals were evaluated in committee and comments generated based on six (6) goals the Commission has established for the upcoming Board of Fisheries UCI meeting:

1. Long-term salmon conservation and protection of salmon habitat.
2. Maintain and enhance the Conservation Corridor in the drift gillnet fishery management plan.
3. Clarify or strengthen conservative management practices which provide protection for current and formerly identified Stocks of Concern.
4. Increase in-river returns of coho and sockeye salmon to Northern Cook Inlet systems.
5. Adjust existing king salmon management plan and strategies to more adequately address conservation concerns for king salmon returning to Northern Cook Inlet drainages.
6. Maintain or extend Personal Use fishing opportunity for Alaskan residents fishing Northern Cook Inlet drainages.

These goals are detailed in a publication you received entitled ["It Takes Fish to Make Fish 2024"](#)

MSB Fish and Wildlife Commission Proposal Positions

Process: BOF proposals of interest were evaluated in a FWC committee, and the recommendations from this committee were forwarded to the full FWC. In all cases the FWC concurred with the committee majority's choice to support or oppose.

We have ordered our comments to follow the published UCI BOF Agenda dated 1/24/24. The agenda provides the organizational approach the Board will take. In the case of the 2024 UCI BOF Road map, we anticipate some procedural difficulties.

Specifically, until the impacts of Federal management in the EEZ are accounted for within the Central Drift Gillnet Management Plan, it is very difficult to assess the benefits/threats of other proposals affecting Northern bound stocks. The uncertainty and potential threat posed by the EEZ cannot be understated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ is shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority. With that in mind the MSB Fish and Wildlife Commission is considering the following:

- 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing.

- 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor.
- 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system

Further, we urged in a letter to Board Chairman Wood to consider managing the meeting such that Committee of the Whole Group 6 Central District Drift Fishery Management Plan is placed ahead of Group 2 Northern District Fisheries Management first on the Boards agenda.

II. Matanuska-Susitna Borough Fish and Wildlife Commission Comments on Proposals

Committee of the Whole – Group 1: Kenai River Late-Run King Salmon Action Plan

The Matanuska-Susitna Borough Fish and Wildlife Commission encourages the Board to consider limiting pink salmon hatchery production, as called for in Proposal 43, as a means to reduce competition with juvenile king salmon. There is uncertainty in the driver behind the decline of western Alaska king salmon stocks, however, many suggest it is an ocean related event in the early stages of development. Dramatic declines as we have seen in Cook Inlet stocks calls for conservative management actions and application of the precautionary principle. We believe the reducing competition by reducing pink salmon hatchery releases, will assist with king salmon recovery.

Committee of the Whole – Group 2: Northern Cook Inlet Subsistence, Northern District Commercial, Smelt, and Susitna Rivere Sport and Personal Use Fisheries (29 proposals)

Any action taken by the Board in Northern District fisheries can only reasonably be considered after addressing the combined impact of the Federally Managed EEZ and the Central District Driftnet fishery. The emergence of the EEZ and associated estimates of total allowable catch (TAC) cast an unprecedented level of uncertainty on the sustainability of salmon stocks now subject to two commercial fishing management systems. The situation demands application of the precautionary principle that guides the Board to error on the side of conservation. Therefore, the Mat-Su FWC will generally be opposed to any expansion of harvest potential in the Northern District fisheries and will seek additional conservation-based actions in the state-managed sockeye and coho salmon fisheries within the Central District to counteract the impacts of the federally managed EEZ.

Additionally, we are seeking measures to ensure fish (primarily kings and cohos) that make it into the Northern District are allocated in accordance with Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other in river users.

[Northern Cook Inlet Subsistence](#)

204 Yentna Subsistence Salmon allow use of sport gear

Oppose

Why? Provide Rationale

(shortage of king salmon) may be the rationale for opposition — however — that does not necessarily measure up — if subsistence has a lawful priority and regulations currently allow harvest by other non-priority users. If adopted by the Board — I believe a season closure should occur for king salmon

conservation based on some Board-identified metric / trigger(s) that should also be consistently applied to all Northern Cook Inlet subsistence fisheries targeting king salmon during times of shortage.

- If adopted there needs to be a defined trigger for closure.
- Enforceability of 3 kings per family

Northern District Commercial Salmon

205 Close stream mouths to commercial set net fishing in the northern district Support

Rationale: This proposal will increase waters closed to commercial fishing for salmon in the Northern District King Salmon Management Plan permanently rather than by emergency order. Prior actions by the Board to close the sport fisheries in waters of the Theodore, Lewis, and Chuitna rivers in response to them being identified (2011) as SOC. Because the sport fishery is closed under regulation and cannot be opened, the department is forced to issue an emergency order every year to close these marine waters. Cleaning up the regulatory language by eliminating unnecessary language will benefit the public, the department, and enforcement. This area would only be closed during the directed Northern District king salmon fishery.

206 Reduce from 12.5k to 2,000 the maximum number of king salmon that may be taken annually Support

Rationale: The current cap of 12,500 king salmon (established in 1986) is inconsistent with the current condition of king salmon production and abundance. Current annual directed harvests average only 2,000 per year with an incidental harvest of another 200 – 500 per year taken in the sockeye salmon commercial fishery. This proposal will “right size” management targets to reflect contemporary stock conditions.

207 Reduce from 12.5k the total allowable commercial set net harvest of king salmon and pair opening of commercial fishery to Deshka River opening to harvest Support Concept

Rationale: The specific allocation directive of the Northern District king salmon management plan calling for a full season of reasonable harvest opportunity for sport, guided sport, and other in river users is not being met. This proposal set a maximum allowable commercial harvest of 15% of the total combined sport and commercial king salmon harvest and creates paired restrictions on the commercial fishery should conservative actions be taken in the sport fishery.

We recognize the inseason difficulty, however, this would establish a post season report card that helps define the allocative target found within the management plans. We fully support the sharing of the burden of conservation through the paired restrictions.

208 Pair closure of the commercial set net fishery for king salmon with closure of the Deshka River sport fishery (Mat-Su AC Proposal) Support

Rationale: The current management practices are not meeting the standard for managing in accordance with Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other in river users. Past loss of in river sport opportunity has not been met with commensurate restrictions in the commercial fishery. Institution of paired

restrictions is a time-tested method to attain balance between users, share the burden of conservation and address allocative decisions by the Board.

209 Close commercial set net fishery by regulation Oppose

Rationale: Management plans, if followed, provide sustainable management and afford a directed allocations established by the Board among beneficial users.

We do not favor elimination of a single group when and if salmon abundance allows for a shared benefit. Rather we are actively supporting Board action to fully implement stated Management Plan purposes; “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users ” as is CLEARLY established in the Northern District King Salmon Management Plan through additional restrictions (not closure) of the Northern District king salmon commercial fishery.

210 Adopt an abundance-based model for managing the Northern District commercial fishery and additional conservative measures into the management plans for commercial set net fishing Support

Rationale: This proposal elevates the standards for managing the Northern District commercial fishery by adding the Little Susitna River weir to the mix of indicators that the Department is obligated to consider and provides specific management targets. It establishes commercial fishing management direction at the mouth of the Little Susitna River based on king salmon and coho salmon abundance as measured at the Little Susitna Weir.

These proposed actions will help correct the chronic disregard for the stated management plan purposes for “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” and the tragic and continued decline of king salmon and coho stocks of the Little Susitna River.

211 Liberalize gear and time restrictions on set net fishing in the Northern District that were adopted as part of the action plan for Stock of Management Concern Susitna sockeye Oppose

Rationale: Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolve there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern district.

The current Board adopted mandate providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users is not being met and this proposal will further exacerbate that condition.

212 Adopt more conservative measures into the management plans for commercial set net fishing Support

Rationale: This proposal establishes a single 35 fathom net limit from June 25 until closed by EO in the set commercial fishery and limits the fishing time to a single period. By establishing commercial regulations at a more conservative level, and those remain static for the season, all other users would have a better opportunity of fishing on a proportionally similar harvestable surplus, as commercial users currently do, throughout the entire run.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern district. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

213 Pair restriction to one set gill net with opportunity for personal use in the Susitna personal use fishery Support

Rationale: This proposal also (see proposal 212) calls for a single 35 fathom net to be legal fishing gear in the Northern District set gillnet fishery. It adds the caveat that if the Lower Susitna Personal Use Fishery is extended based on abundance of coho and sockeye then the Northern District fishery may be permitted to use two nets. This proposal seeks to balance opportunity for many Alaskans in the Personal Use and in-river fisheries with opportunity for a limited number of commercial setnet permit holders. Paired restriction is a common and effective practice within the Board process. This proposal links fishing power within the set gillnet fishery with extended opportunity in the PU fishery for upriver users.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern district. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

214 Pair restriction to one set gill net and time restrictions for commercial set net fishing to opportunity to sport fish in Little Susitna and in Susitna personal use fishery Support

Rationale: This proposal seeks to address the continued frustration of many who fish the inland waters of the Mat Su Borough. Despite adopted language for coho salmon to be managed “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” the vast majority are still being taken in the Northern District set gill net fishery. By limiting the Northern District to a single 35 fathom net from June 25 – July 13 and then allowing 105 fathoms from July 14 through July 19 and linking an extension of the PU fishery in the Little Susitna on July 20 there will be greater salmon abundance realized inriver fisheries and applying paired restrictive management measures the proposal seeks to attain balance in harvest opportunity.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern district. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

131 Add Wednesday as a third regular period for set nets Oppose

Northern district. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

222 Allow harvest of six pink salmon per day in addition to bag limit for chum, sockeye and coho within the Susitna River Drainage Support

Rationale: Pink salmon are the most abundant salmon in the Susitna River drainage and as such can provide additional harvest opportunity for those who wish to take them.

223 Special management areas for rainbow trout in Susitna Oppose

Rationale: This proposal would add the Susitna River, from Alexander Creek to Devils Canyon from Sept 15 – May 15 to the waters managed under catch and release special management restrictions that include no bait. Stocks in this river section are not reported to be a declining condition and the waters proposed for Special Management have not had a management history that would meet necessary criteria for selection and management as a Special Management water. Numerous other fisheries are currently under special management designations and therefore address the demand for diverse fishing opportunities.

224 Special management areas for rainbow trout in Susitna Oppose
See comments in 223.

225 Increase harvest of rainbow trout Oppose

Rationale: This proposal seeks to increase harvest opportunity for rainbow trout to reduce their presumed predatory impact on depressed salmon stocks. There is no precedent in management or scientific evidence to support the assertions that rainbow trout predation is somehow linked to depressed salmon populations. To increase harvests will necessarily diminish the quality of the rainbow trout recreational fisheries.

226 Dropper flies Oppose

Rationale: This proposal seeks to allow two flies to be used in tandem (dropper) and rightly points out that this is common gear in most trout waters of the American west. However, missing from those waters are salmon and the potential affect that adding gear to the fishery may have on catch rate of other species is of concern.

227 Increase harvest of Dolly Varden Defer to Department

[Susitna River Personal Use](#)

228 Close dipnetting in the vicinity of Anderson Creek during the personal use fishery on the lower Susitna River Support

Rationale: This is a department proposal that provides necessary protection for Anderson Creek coho which are susceptible to over harvest if targeted in the Susitna River personal use fishery. The Department considers this a housekeeping measure following the establishment of the personal use fishery in 2020.

229 Add two days per week to dipnetting in the lower Susitna River personal use dip net fishery Support

Rationale: There have been numerous allocative proposals before the Board to take actions that allow in river users the opportunity to harvest sockeye and coho salmon. Depending on the prior actions of the Board this proposal is a viable option to redistribute opportunity to Alaskans who would like to harvest salmon for personal use. The fishery would remain managed through emergency order should a lack of abundance dictate a conservative action be taken.

230 Add day per week and extend date during which the personal use fishery in the lower Susitna River is open Support

Rationale: There have been numerous allocative proposals before the Board to take actions that allow in river users the opportunity to harvest sockeye and coho salmon. Depending on the prior actions of the Board this proposal is a viable option to redistribute opportunity to Alaskans who would like to harvest salmon for personal use. The fishery would remain managed through emergency order should a lack of abundance dictate a conservative action be taken. It is anticipated that this additional time would result in a minimal increase in PU harvest.

231 Shift the dates during which the personal use fishery in the lower Susitna River is open later by one week (Matanuska-Susitna Borough Fish and Wildlife Commission Proposal) Support

Rationale: Management plan intent is clear: "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users to harvest these resources over the entire run. The board created this fishery with conservative opportunity during the last board cycle. Personal use harvests have been modest during the first three years of this fishery and harvest data indicates the first Saturday and Wednesday (up to one third of the annual personal use harvest opportunity in this fishery) occur before there are many salmon available for harvest. Harvest data and ADF&G Susitna River drainage fish wheel and weir data indicate better abundance of the 4 salmon species open to harvest in this fishery later in the season. Shifting a later opening will enhance harvest opportunity in the Personal Use Fishery.

Committee of the Whole – Group 3: Cook Inlet Areawide Sport Fisheries, Knik River Area Sport Fisheries, and Anchorage Area Sport and Personal Use Fisheries (24 Proposals)

[Cook Inlet Areawide Sport Fisheries](#)

232 Allow Alaska residents to buy more than one sport fishing license and take additional daily bag limits Opposed

Rationale: Alaska sport fishing regulations and management systems have effectively regulated seasons, bag limits, methods and means for decades. Additional licenses are not necessary to realize additional harvest under the current system. Bag limits can be adjusted when warranted and seasons can be extended. The parallel drawn by the proposer with permit stacking in the commercial fishery is misplaced.

233 Establish additional criteria for sport fish derby **Oppose**

Rationale: This proposal seeks to require specific stock assessment programs take place in advance of approval for a sport fishing derby. These factors are already considered within the approval process and there is no history of an approved derby contributing to a stock decline.

[Knik River Area Sport Fisheries](#)

234 Clarify the northern boundary of the Knik Arm Management area and the Palmer Wasilla Zone and exclude certain flowing waters from the Palmer-Wasilla Zone (Department Proposal) **Support**

Rationale: Northern pike have become prolific in certain flowing waters within the Palmer-Wasilla Zone, but springtime closure of flowing waters within the zone designed to protect spawning rainbow trout also protect northern pike in certain waters where they have taken a stronghold. Excluding certain flowing waters where northern pike exist would increase northern pike harvest in those waters.

235 Reduce size of the Palmer-Wasilla Zone **Neutral/Support?**

Rationale: Waters of the Palmer – Wasilla zone has an April 15 - June 14 closure to protect spawning rainbow trout, however a portion of this closure area now may be primarily infested by invasive northern pike (similar to Proposal 234), with few significant populations of rainbow trout remaining to utilize flowing waters. This portion of the season could provide an opportunity to remove more invasive northern pike with little insignificant impact on rainbow trout in a specific portion of the current Palmer-Wasilla zone.

236 Bookkeeping by ADFG **Support**

Rationale: This proposal updates the stocked lakes list for the Knik Arm drainage. Stocking has been discontinued in one lake and newly initiated in several lakes. Without action anglers may miss the benefit of greater bag limits for stocked waters and enforcement would not be able to monitor fisheries appropriately.

237 Allow bow and spear for Northern Pike and Blackfish **Support**

Rationale: Invasive Northern Pike and Alaska Blackfish have been found and documented in various waters in the Knik Arm and Susitna River drainages, several of which fall in the "Palmer-Wasilla Zone Flowing Waters" management area. This management area is open to fishing June 15 - April 14, which excludes the spawning season for Rainbow trout, as well as that of Northern Pike. This denies an excellent opportunity for selectively harvesting Northern pike with a bow-fishing setup when they are in shallow waters for the spring spawn when tend to allow people to approach more closely.

238 Establish a motor size restriction for the Little Susitna River, no size suggested **Oppose**

Rationale:

239 Adopt a large fish escapement goal for king salmon on the Little Susitna (no suggested size for large fish offered) Support Concept but Defer to ADFG

Rational: Large fish escapement goals for king salmon more precisely address escapement goal development and stock productivity. Where the technology to monitor, and the data exist, establishment of large fish escapement goals for king salmon are a preferred management tool.

240 Increase the time during which bait can be used in the Little Su to from July 13 and not from August 5 Position?

Rationale:

241 Pair use of bait in Little Su to openings in ND set net fishery Oppose

Rationale: This proposal speaks to the frustration in-river users are expressing over the chronic disregard in management practice ignoring the Board mandated directive “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users.” We do not think this approach is practical but we understand the frustration and urge the Board to look to other proposal vehicles to address this valid concern.

242 Prohibit catch and release of coho salmon in the Little Susitna downstream of the weir at all times and mandate retention Oppose

Rationale: The Department has deemed the regulations governing this fishery and the practice of catch and release specifically to be sustainable. Unnecessarily limiting opportunity as proposed is detrimental to the sport fishing public who utilize these waters.

243 Restore bag and possession limit of three coho, up from two Defer to ADFG

This proposal speaks to the frustration that Susitna drainage sport fishermen have with respect to the chronic pattern of ignoring the Board mandated directive “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users.” Reestablishing a 3 fish bag limit can be accomplished if restrictions in the Central District Drift gillnet fishery occur as well as those called for in the Northern District Commercial Fishery. Such changes could logically deliver more coho to Northern District streams and therefore allow the reinstatement of an additional fish to the bag limit.

However, until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolve there is no responsible way to consider liberalizing Northern District commercial fisheries as some have called for. Greater protections for the Conservation corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern district. Consistent with that strategy is the importance to manage the Northern District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

244 Clarify boundaries of Fish Creek mouth (ADFG Proposal) Support

Rationale: Regulatory markers posted at the mouth of Fish Creek do not adequately delineate fresh vs. salt water because the markers, due to large tidal fluctuations, must be posted at a higher elevation, well upstream of mean low tide that distinguishes fresh from salt water in statewide regulations. Special regulations that restrict salmon harvest in the Fish Creek sport fishery to three salmon per day of which only two may be a coho salmon and limit fishing to weekend only, currently do not conserve salmon caught within the Fish Creek channel downstream of the markers where sport fishing under saltwater regulations is allowed seven days per week, with six salmon allowed per day. Returning to the definition for fresh waters given in statewide regulations and adding a quarter-mile radius to the freshwater determination, will ensure special regulations developed for Fish Creek salmon conserve all salmon entering the Fish Creek channel that are bound for Fish Creek.

245 Increase opportunity to sport fish for salmon in Fish Creek Neutral

Rationale

246 List lakes where anglers can use up to five lines for NP (ADFG Proposal) Support

Rationale: Northern pike are a predatory fish invasive to Southcentral Alaska and can pose a significant threat to salmon and resident fish species in the region. To encourage anglers to harvest northern pike, systems that primarily contain northern pike have regulations allowing anglers to use five lines through the ice. Expanding that list to include the proposed waters may encourage anglers to fish these areas and harvest northern pike. Northern pike were eradicated from Anderson Lake and this lake can now be removed from the list.

247 Prohibit chumming in specific waters (ADFG Proposal) Support

Rationale: Regulations prohibiting use of bait during the ice fishery on Big Lake are difficult to enforce. Determining whether an angler is using bait or an attractant on the hook while chumming is difficult; an angler may be scenting hooks under the guise of chumming to attract fish.

248 Catch and release on Char in Fish Creek drainage (ADFG Proposal) Support

Rationale: Review of Statewide Harvest Survey (SWHS) data shows a decline in the abundance of Arctic Char, particularly of large fish over 20 inches in length. Non-retention would maximize recruitment into mature age classes and maximize spawning events to help rebuild the stock. The department has been issuing emergency orders to restrict sport fishing for Arctic char in Big Lake to catch-and-release only for the past two calendar years.

Mirror and Flat lakes have direct connections with Big Lake, allowing migration and sharing of fish between lakes. Resident species such as Arctic Char and burbot in Big Lake are no longer protected by conservative regulation when they migrate to neighboring Mirror and Flat lakes.

249 Bookkeeping by ADFG Support

Rationale: This proposal updates the stocked lakes list for the Knik Arm drainage. Stocking has been discontinued in one lake and newly initiated in several lakes. Anglers may miss the benefit of greater bag limits for stocked waters and enforcement would not be able to monitor fisheries appropriately.

[Anchorage Area Sport Fisheries](#)

250	Modify closure date for Ship Creek	NA
251	Reduce opportunity to harvest salmon in Eklutna drainage	Defer to ADFG
252	Restore bag and possession limit of three coho, up from two	Defer to ADFG
253	Dropper flies	Oppose

Rationale: This proposal seeks to allow two flies to be used in tandem (dropper) and rightly points out that this is common gear in most trout waters of the American west. However, missing from those waters are salmon and the potential affect that adding gear to the fishery may have on catch rate of other species is of concern.

254	Add Chester Creek to special management waters for trout	NA
255	Create a personal use dip net fishery for salmon in the 20 Mile and Placer Rivers	Oppose

Rationale: Concerns with potential for overharvest

Committee of the Whole – Group 4: Stock of Concern – Kenai River Late Run King Salmon Management Plan, Kenai River King Salmon, Upper Cook Inlet Salt Water King Salmon Sport Fishery Plan (46 Proposals)

The Work Group Elected to Not Address these

Committee of the Whole – Group 5: Sockeye Salmon Management Plans (8 Proposals)

The Work Group Elected to Not Address these

Committee of the Whole - Group 6: Central District Drift Gillnet Fishery Management Plan, Fishing Districts and Gillnet Specifications and Operations, Pink Salmon Management Plan, Hatchery Production, Upper Cook Inlet Management Plan, West Cook Inlet Salmon (25 Proposals)

[Central District Drift Gillnet](#)

121	Repeal intent language that has guided regulatory development of drift fishery since 1990's and replace with language that favors harvest by drift fishery	Oppose
------------	---	---------------

Rationale: Allocation of salmon resources for the benefit of Alaskans rest with the Board of Fisheries. Decisions to place the statement “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users.” on the use of these common property resources takes into account the number of beneficial users and the impact to state and local economies. Preferences provided in the current plan addresses those considerations. The only change necessary is to fully implement these directives are more deliberate efforts to manage the commercial fishery in the Central District Drif Gillnet fishery for fish passage to the Northern District and are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quickly to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

122 Repeal the ‘one percent rule’ in the Central District drift gillnet fishery

Oppose

Rationale: Amend this proposal to institute a 3% rule in an effort to implement the management directive “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” for coho salmon moving through the Central District bound for the Northern District. A predictable and managed end to the commercial fishery is essential in meeting this Board approved mandate.

By placing the Central District drift fleet into the harvest corridor, the 3 % rule would be achieved later than if allowed to continue to fish in the waters of the conservation corridor, this affords greater commercial opportunity to harvest abundant Kenai and Kasilof sockeye salmon.

More deliberate efforts to manage the commercial fishery in the Central District Drif Gillnet fishery for fish passage to the Northern District are warranted now more than ever. With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quickly to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

123 Repeal the “one percent rule” from Upper Cook Inlet commercial salmon fishery management plans **Oppose**

Rationale: See comments for 122.

124 Repeal the “one percent rule” from Upper Cook Inlet commercial salmon fishery management plans **Oppose**

Rationale: See comments for 122.

125 Repeal sections of the CDDGFMP to provide additional commercial opportunity for drift fishery **Oppose**

Rationale: Allocation of salmon resources for the benefit of Alaskans rest with the Board of Fisheries. Prior Board decisions to direct that “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” qualification on the use of these common property resources takes into account the number of beneficial users and the impact to state and local economies. Preferences provided in the current plan addresses those considerations. The only change necessary is to fully implement these directives are more deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quickly to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

126 Increase drift gillnet fishing opportunity in Drift Gillnet Area 2 **Oppose**

Rationale: See comments for proposal 126.

127 Increase time for Drift Fishery to two 12 hr. openings inlet wide and one 12 hr.

opening in 6-mile corridor each week

Oppose

Rationale: Allocation of salmon resources for the benefit of Alaskans rest with the Board of Fisheries. The Board has established management guidance: "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users." on the use of these common property resources takes into account the number of beneficial users and the impact to state and local economies. Preferences provided in the current plan addresses those considerations. The only change necessary is to fully implement these directives are more deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quickly to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

[Fishing Seasons, Weekly Periods, Set Gillnet Gear, and Registration](#)

128	North K Beach shall fish with both Kasilof and Kenai	NA
129	Allow North K Beach to fish early with Kasilof openings	NA
130	Lengthen set net season through end of August	NA
132	Add Wednesday as a third regular period for set nets	Oppose
	Don't need the additional fishing power See the Northern district comment Windows would be disrupted and mess up the allocation	
133	If set nets do not fish at least 2 12's a week then other fisheries must be closed or restricted "equally"	NA
134	Commercial fisheries must fish at least 2 days per week	Oppose

Rationale: This proposal would establish two 12-hour Inlet wide fishing periods regardless of run size or status by repealing restrictions that have been designed to provide for terminal stock fisheries

management, distribute fishing opportunity across all users and provide for sustainable returns to inland waters. Inlet-wide fishing results in indiscriminate mixed stock harvests and does not take into account the differing run strengths and productivity levels of stocks that make up these mixed stock fisheries.

The Board moved past this old system when they established the harvest corridor an intentionally use it to target Kenai and Kasilof sockeye effectively while keeping open the conservation corridor for the passage of Northern bound stocks into the Susitna drainage.

More deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quickly to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

135 Close Chinitna Bay Subdistrict to commercial fishing for salmon NA

136 Prohibit commercial drift fishing within 1 mile of mouth of Silver Salmon and Shelter creeks Support

Rationale: This proposal seeks to create a 1-mile buffer around the mouths of Silver Salmon and Shelter Creeks in an effort to conserve coho salmon. This is a commonsense proposal that is similar to others around the state that protect mouths of streams from creek robbing.

137 Add the Little Susitna River to the list of waters in the ND where commercial fishing is prohibited within distance from mouth Support

Rationale: Area protections have long been used in fisheries around the state to prevent river and creek mouths from being corked off. This is a commonsense proposal that will have lasting conservation benefits.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Harvest (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

138	Allow use of a seine lead in the set net fishery and redefine minimum distance between gear	NA
139	Allow reef nets	NA
140	Allow reef nets	NA
141	Direct or incentivize use of 29 mesh depth gill nets in the upper subdistrict at all times (KRSA Proposal)	NA
142	Require that jack king salmon be recorded on fish tickets	Defer to ADFG

143 Allow Upper Cook Inlet set gillnet permit holders to fish in more than one registration area per year **Oppose**

- Increases fisher power (see 131)
- Intercepts fish to N District
- Drastically changes allocation

Hatchery Production

43 Reduce hatchery production **Support**

- Cuts the egg take way back
- Should be in all action plans for stocks of concern particularly the late run Kenai River King Salmon Action Plan
- Competition with wild fish that are in dramatic decline

Pink Salmon

144	Add commercial fishing time for set and drift to target pink salmon, no mention of king salmon conservation	Oppose
145	Add commercial fishing time for set and drift to target pink salmon, no mention of king salmon conservation or allocation of coho salmon	Oppose

Committee of the Whole – Group 7: Kasilof King Salmon Sport Fisheries, Vessel and Habitat Restrictions, and Guides (15 Proposals)

The Work Group Elected to Not Address these

Committee of the Whole- Group 8: Kenai, Kasilof, and Russian River – Sport and Personal Use (39 Proposals)

The Work Group Elected to Not Address these



MATANUSKA-SUSITNA BOROUGH

Planning and Land Use Department

Planning Division: Wetland POA Review/Comments

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833 • Fax (907) 861-7876

www.matsugov.us • planning@matsugov.us

Waterway: Little Meadow Creek

Petitioner/Owner: Sterling Cook

Reference Number: POA-2023-00398

Nature of Request / Impact Size and Type: To fill 3.30 acres of palustrine wetlands for access needs to thirty-one floatplane slips. The amount and type of fill was not documented. They are also proposing to dredge 3.11 acres / 13,398 cubic yards of palustrine wetlands to construct floatplane slips.

Location: The project site is located within Section 27, T. 18 N., R. 2 W., Seward Meridian; USGS Quad Anchorage C-7; Latitude 61.623021^o N., Longitude 149.622168^o W.; Matsu Borough Account Number 57331000L004 (Lot 4-Parcel ID 523619) and Account Number 57331000L003 (Lot 3-Parcel ID 523619), MooseyBou Properties, in Wasilla, Alaska.

Date/Due Date: January 15th

USACE Staff Contact: Please contact Estrella Campellone at (907) 753-2518, toll free from within Alaska at (800) 478-2712, or by email at Estrella.f.campellone@usace.army.mil if further information is desired concerning this notice.

Planner completing this Review: Kim Sollien

Case#: **Watershed:** Little Meadow Creek **Community Council:** Meadow Lakes

Staff Comments: Additional documentation is necessary to understand the cumulative impacts on salmon, the hydrology of Little Meadow Creek, and the community from this proposal prior to USACE's determination. If this permit is granted, the MSB requests full 1-to-1 mitigation for the wetland impacts of this proposal.

The Borough's comments follow the federal "2007 Final Rule" guidance: "The fundamental objective of compensatory mitigation is to offset environmental losses resulting from unavoidable impacts to waters of the United States authorized by Clean Water Act Section 404 permits issued by the U.S. Army Corps of Engineers. Compensatory mitigation enters the analysis only after a proposed project has incorporated all appropriate and practicable means first to avoid and minimize adverse impacts to aquatic resources."

[Compensatory Mitigation | Wetlands | US EPA](#)

The MSB Planning Division generally agrees with avoiding, minimizing, and mitigating unavoidable impacts on wetlands. For the latter, we advocate for a full 1 to 1 mitigation remedy through a USACE-approved program.

Avoidance Comments:

For this development, the avoidance measure is not possible. The 28-acre parcel is comprised of 100% VLD Trough wetlands. The link below is the wetland viewer that documents wetland presence.

<https://www.arcgis.com/apps/webappviewer/index.html?id=15658472427f459ab6d73b1d3ca5ab77>

The application states that the development of thirty-one float plane slips for a new seaplane base will disturb/fill 6.41 acres of wetlands.

The application also states that the float plane slips will be 25 feet wide, by 30 feet long, and (BLANK) deep. It is unclear how deep the slips will be and how much fill material will be removed. The USACE should document dredge material calculations before completing the evaluation.

The application also states that “excavated peat material that is not used to create access areas would be discharged in uplands.” This parcel contains no uplands. Further clarification from the USACE as to where the fill is going is necessary.

Minimizing Impacts Comments:

The application speaks to rerouting Little Meadow Creek to maintain flow. More documentation is needed to understand the design of the reroute and the potential impacts on hydrology. The application states, “To maintain water flows in Meadow Creek, the applicant proposes to reroute a section of Meadow Creek through the seaplane base. Hydrology would be directed through a trench into a 60-foot long by 12-inch diameter culvert under existing runway.” The proposal and rough drawings for the rerouting of Little Meadow Creek are insufficient to understand the need and potential hydrologic and habitat impacts.

Currently, the creek flows naturally from Island Lake through the runway area. If the float plane slips are constructed from dredged and filled wetlands, the creek would maintain its existing meander through the parcel outside the slips. A constructed outlet may be necessary because the development will disturb the existing natural outlet. Additional information is needed to understand the reasons and methods proposed for channeling the creek and placing the culvert under the runway. USACE needs further documentation to clarify the need to reroute the creek under the runway.

Additionally, the Matanuska Susitna Borough has determined that the Little Meadow Creek culvert on North Pittman Road needs to be replaced with a fish passage culvert. It is crucial to investigate whether the 12-inch, 60-foot-long culvert is adequate to support adult and juvenile salmon migration once it is replaced.

Additional documentation is needed to thoroughly understand if this proposed design is appropriate and necessary. And, if so, whether the culvert, as presented, considering the flow volumes of the outfall of Island Lake, is sufficient for the migrating salmon.

Mitigation Comments:

The MSB finds the applicant's mitigation proposal to be insufficient. The applicant is proposing NO mitigation. If the permit is approved, Per the 2007 Final Rule, the MSB requests that the applicant fully mitigate any filled wetlands by purchasing full compensatory mitigation credits. These credits should be purchased from a USACE-approved mitigation bank located in the MSB closest to the project impact or an approved In-Lieu Fee Program and using USACE-approved methods for calculating debits and credits to fully mitigate lost wetland services to the Little Meadow Creek watershed.

Supporting Recommendations, Comments, and Information:

The proposed impacted wetlands are crucial in providing essential ecosystem services for MSB residents, fish, and wildlife. Little Meadow Creek is mentioned in ADF&G's anadromous waters catalog for providing an essential habitat for spawning and rearing Coho, Pink, and Chum salmon. It also serves as a migration corridor for Sockeye salmon. Given its anadromy, any alterations to Little Meadow Creek's hydrology and flow volumes from the outlet of Island Lake or the surrounding wetlands may harm salmon production. USACE must document all the impacts from the dredge and fill proposal and the channelization and piping of Little Meadow Creek at the system's headwaters, before making a determination.

A notable gap in the application lies in the absence of a comprehensive Environmental Impact Assessment. Such an assessment should encompass an analysis of potential impacts on local flora and fauna, air and water quality, and the long-term effects on the overall ecosystem. It is crucial to address these concerns to ensure a thorough understanding of the project's environmental implications.

Tribal Consultation:

The permit section that speaks to Tribal Consultation lacks the actual consultation information and only defines the concept. The USACE needs to document how the tribes were consulted and the outcome of that consultation.

Additional Information:

The application states that the applicant will contact ADF&G and the MSB. Documentation of this needs to be included as part of the decision.

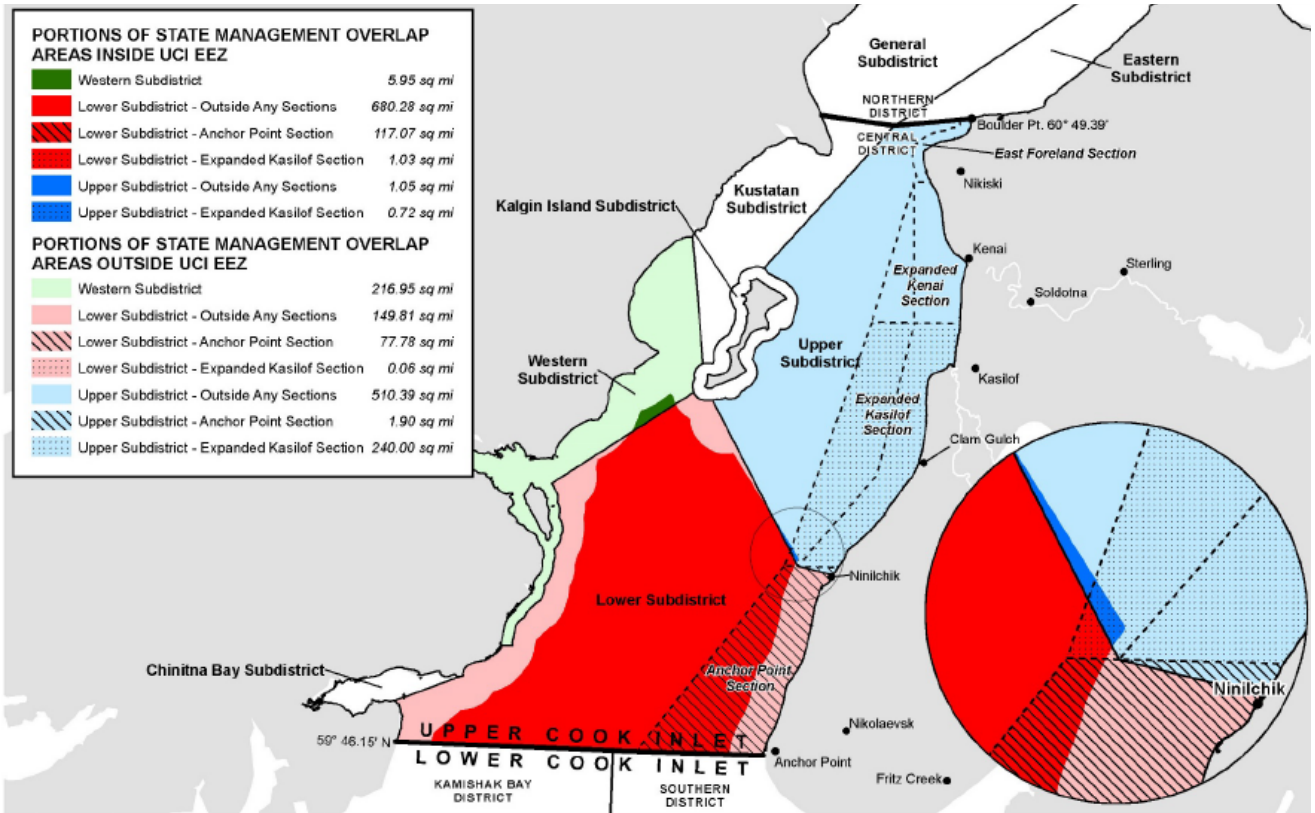
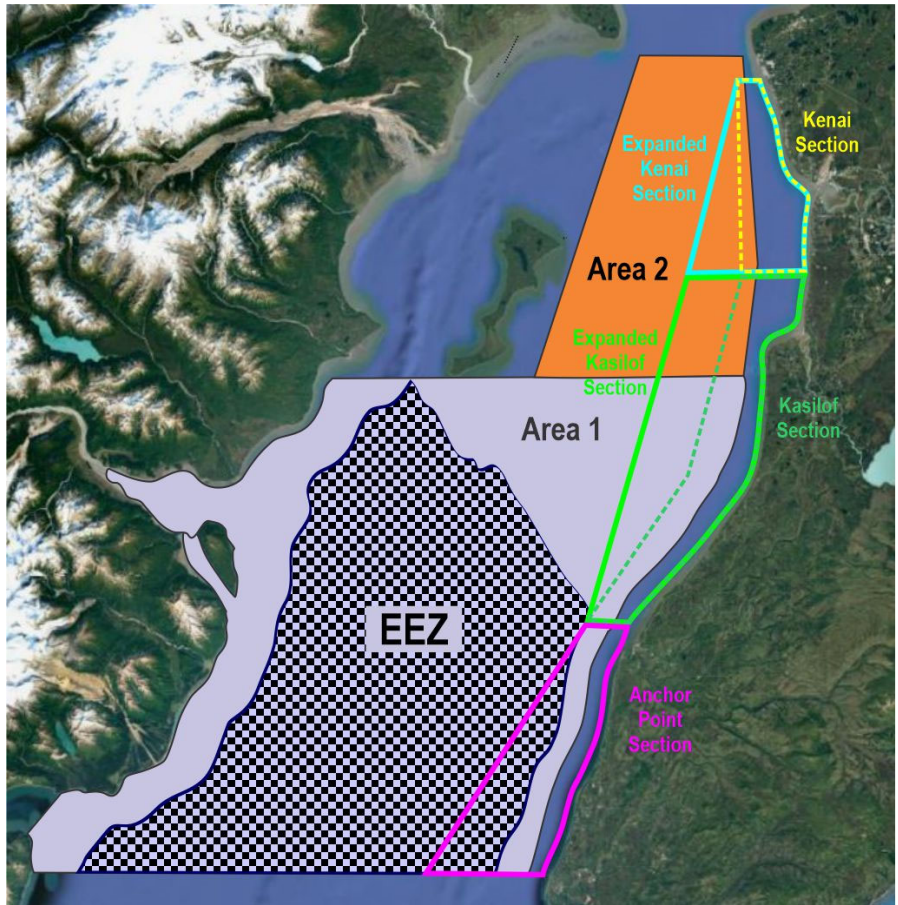
Cumulative Impacts: A seaplane base development in the middle of a residential neighborhood may have negative impacts. Use of the lake by existing landowners may be impacted by thirty-one planes taking off and landing. Though not discussed in the application, other infrastructure will need to be developed as part of this project to support the thirty-one slip holders and their access to their aircraft. This should also be a consideration as this permit is evaluated. USACE must seek further clarification on the cumulative impacts of this development prior to making its determination.

Adopted MSB Plans & Code Supporting Avoiding, Minimizing, and Mitigating Wetland Losses:

1. [MSB 2012 Wetland Management Plan](#)
2. [MSB Comprehensive Plan 2005 Update](#)
3. [MSB Economic Development Strategic Plan](#)
4. [MSB Title 27 Platting Regulations](#)
5. [MSB Natural Resources Unit Plan](#)
6. [MSB 17.29 Flood Damage Prevention](#)
7. [MSB Ordinance 05-023 called for adopting voluntary BMPs for development around waterbodies](#)

Central District Drift Gillnet Management Plan vs. Federal EEZ Plan

Dates	Kenai Run	State Plan	Federal Plan	Notes
Season open	--	3 rd Mon in June or Jun 19, whichever is later	3 rd Mon in June or Jun 19, whichever is later	Same
Open – Jul 8	All	2 regular periods/week, <u>district-wide</u>	2 regular periods/week in EEZ (portion of area 1)	Equivalent
July 9-15	All	2 regular periods/week in <u>Area 1</u> and expanded Kenai & Kasilof sections	2 regular periods/week in EEZ (portion of area 1)	Equivalent
	>2.3 mil	Extra period in <u>Area 1</u> and expanded Kenai & Kasilof sections	Not applicable	Reduction relative to state plan because no extra EEZ/area 1 opener
	All	Additional time in expanded Kenai & Kasilof sections	Not applicable	--
Jul 16-31	<2.3 mil	2 periods/week in expanded Kenai & Kasilof sections	2 regular periods/week in EEZ (portion of area 1)	Significant expansion relative to state plan (2 extra EEZ/area 1 periods/week x 2 weeks = 4 extra openers)
	2-3-4.6 mil	1 period/week in <u>Area 1</u> and expanded Kenai, Kasilof & Anchor Point sections 1 period/week in expanded Kenai, Kasilof & Anchor Point sections	2 regular periods/week in EEZ (portion of area 1)	Expansion relative to state plan (1 extra EEZ/area 1 period/ week x 2 weeks = 2 extra openers) Note portion of Anchor Point section in EEZ is open in state plan
	>4.6 mil	1 period/week district-wide 1 period/week in expanded Kenai, Kasilof & Anchor Point sections	2 regular periods/week in EEZ (portion of area 1)	Expansion relative to state plan (1 extra EEZ/area 1 period/ week x 2 weeks = 2 extra openers)
	All	Additional time in expanded Kenai, Kasilof & Anchor Point sections	Not applicable	--
Aug 1-15	All	2 regular periods/week in <u>Area 1</u> and expanded Kenai, Kasilof & Anchor Point sections	2 regular periods/week in EEZ (portion of area 1)	Equivalent (except when early closure triggered by 1% rule in state plan)
		Additional time in expanded Kenai, Kasilof & Anchor Point sections	Not applicable	--
Closure	All	<1% of season total sockeye catch taken in 2 consecutive periods	When TAC exceeded or overfishing limit reached	Closure in EEZ not triggered under the Federal plan by 1%, Season will likely run until Aug 15 in most years – perhaps 1-2 extra openers
Aug 16-31	All	Areas 3 (west side state waters) & 4 SW inlet state & some EEZ waters) may continue through Aug unless closed by EO	No provision for additional fishing currently	Reduction relative to state plan because lose portion of area 4 in EEZ after Aug 15



Source: esri, ADF&G, IPHC, ADNIR, AK State Geo-spatial Data Clearinghouse

To: John Wood
Chairman, Alaska Board of Fisheries

From: Matanuska-Susitna Borough
Fish and Wildlife Commission

Date: January 30, 2024

Re: UCI Board of Fisheries Agenda

Chairman Wood

The members of the Matanuska-Susitna Borough Fish and Wildlife Commission and the residents of the Mat Su Borough deeply appreciate your service as Chairman of the Alaska Board of Fisheries and we are looking forward to a positive meeting next month.

In reviewing the proposals and the ordered meeting agenda for deliberation, we would encourage you to consider moving Group 6: Central District Drift Gillnet Fishery Management Plan, Fishing Districts and Gillnet Specifications and Operations, Pink Salmon Management Plan, Hatchery Production, Upper Cook Inlet Management Plan, West Cook Inlet Salmon (25 Proposals) to be the beginning of the deliberation agenda, perhaps following work on Group 1 Kenai River Late-Run King Salmon Action Plan.

As Borough residents we are very concerned about the impact that Federal management within the EEZ will have on the movement of salmon to the Northern District. Harvests within the EEZ and those in State managed waters are necessarily additive and the impact of these combined harvests are unknown. It seems that the state will have no alternative but to restrict the fisheries, particularly the drift-gillnet fisheries, within what remains state managed waters to account for the additional harvests from the EEZ. Without an understanding of how the impact of the harvests of the EEZ are accounted for, we are struggling to understand what adjustments to the Northern District fisheries ought to be considered.

We appreciate your awareness of the issues we have brought forth and hope you will consider arranging the schedule to place Group 6 early in the deliberation process.

Respectfully,