
ALASKA BOARD OF FISHERIES

Work Session

Anchorage | October 28-29, 2026

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October 13, 2026

Re: Follow-up on Pelagic Trawl Proposals from the March 2026 Statewide Finfish Meeting

Dear Members of the Board,

We are submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA is a Sitka-based organization of commercial fishermen dedicated to sustainable fisheries and thriving fishing communities. We have a longstanding commitment to protecting fish habitat and long-term ocean health. These comments address our ongoing concerns with State management of pelagic trawl gear.

Introduction

State regulation (**5 AAC 39.105(d)(10)(C)**) defines pelagic trawl gear as a trawl in which the net, trawl doors, and other trawl-spreading devices do not operate in contact with the seabed. This is a substantive standard that distinguishes pelagic trawl gear from bottom-contact trawl gear. This distinction forms the basis for area closures designed to protect sensitive habitats from mobile bottom-contact gear.

The regulations, however, do not require a vessel to carry a functioning seafloor-contact monitoring system, continuously record gear performance in relation to the seabed, retain the resulting data, or make those records available to enforcement. The current definition, therefore, establishes an off-bottom requirement without providing a practical and consistent means of determining whether a vessel complies with that standard during individual tows. As a result, the regulation lacks a practical and consistent mechanism for verifying compliance.

In March 2026, the Board of Fisheries (BoF) considered Proposals 163 and 164, which sought to prevent seafloor contact by pelagic trawl gear or prohibit trawlers from operating in areas closed to bottom trawling until vessel operators could document compliance with existing regulations. After receiving significant public testimony in support of these proposals, the BoF chose to take no action, instead referring the issue to the Joint Protocol Committee (JPC) to address questions related to bottom contact, habitat impacts, and monitoring technology. During the March discussion, BoF members also expressed support for working with Department staff and stakeholders following the JPC meeting to develop a Board-generated proposal, emphasizing the importance of ensuring that the public's concerns would not be lost or indefinitely delayed. The record also reflects BoF members' recognition of the concerns underlying these proposals. Board Member Irwin's proposed substitute language addressed the need for bottom contact sensors and the retention and submission of sensor data ([RC 145](#)), while Member Wood's draft findings would have reaffirmed the Board's intent to prevent seafloor contact by pelagic trawl gear under the State's existing regulation ([RC 156](#)). Although neither RC was adopted, they emphasize that concerns about verifying compliance and protecting seafloor habitat were recognized during the March meeting.

With the JPC process now complete, ALFA submits these comments to encourage the BoF to build on these discussions during its October 2026 Work Session and advance a clear, enforceable path toward verifying compliance with the existing regulations and protecting seafloor habitat from contact with pelagic trawl gear.

Background

Information presented to the BoF during its March 2026 Statewide Finfish and Supplemental Issues meeting demonstrated that gear classified as pelagic trawl does contact the seafloor during normal fishing operations. The record also demonstrated that monitoring technologies are available to document gear performance in relation to the seabed. Although these technologies may not provide real-time information, they can establish a vessel's compliance with existing regulations on a trip-by-trip, weekly, or seasonal basis. If the Board is unwilling or unable to require electronic monitoring sensors on pelagic trawls to collect the necessary data, the Board could prohibit trawling in state waters currently closed to bottom trawling unless and until vessel operators demonstrate compliance with existing regulations. Alternatively, the BoF could seek legislative authority from the State to require seafloor contact technology. Regardless of which path the BoF selects, ALFA urges the BoF to take action to advance a compliance solution that protects seafloor habitat from pelagic trawl gear. In March we submitted extensive written testimony documenting our concerns with seafloor contact from pelagic trawl; those concerns are briefly summarized below.

Habitat impacts

State waters contain important spawning, rearing, feeding, molting, and refuge habitat for crab, groundfish, rockfish, salmon, halibut, and other marine species. They also support benthic invertebrates and habitat-forming organisms that contribute to the productivity and ecological function of Alaska's coastal marine ecosystems.

Seafloor disturbance is not limited to the crab or fish that may be observed in a net. Contact by trawl doors, footropes, nets, and other gear components can disturb sediments, alter seafloor structure, damage or displace benthic organisms, and injure or kill crab and other species without those effects appearing in prohibited species catch records. Some benthic habitats and organisms recover slowly. Coral and sponge species documented off Alaska can live for hundreds of years and tend to be very slow growing (see [2026 Seabank report](#), pp 38-41). Consequently, the effects of repeated contact may persist well beyond an individual tow or fishing season, and disturbed areas may not be recolonized at all if impacts continue ([2026 Seabank report](#), pp 192-194). As Prince William Sound marine ecologist Dennis Lees explains:

“As a marine ecologist, I have been studying nearshore ecosystems in Prince William Sound since 1975, conducting many of the first baseline studies of these systems,” said marine ecologist [Dennis Lees](#). “My knowledge of the seabed makes clear that the damage trawlers do to bycatch is just part of the problem. Dragging on the seafloor does considerable damage to the basic ecosystems that support not only the resources trawlers intend to harvest, but also other associated fisheries and

the ability of those infaunal systems to support those fisheries resources. The volume of science describing these injuries is extensive, from all over the world, and goes back centuries. My current research indicates that infaunal ecosystems contribute far more energy to fisheries species than is currently recognized by infaunal and fisheries scientists. It also shows that injured ecosystems right there in Prince William Sound take decades to recover. Therefore, protecting these systems from injury is important. Trawlers' destruction of the ocean floor and the cascading impacts of that destruction is a well-documented problem and it boggles the mind that regulators continue to ignore it."

The existing pelagic trawl definition is intended to prevent these impacts by requiring the gear to operate off the seabed. Without a monitoring requirement, however, the state cannot consistently determine when or where contact occurred, how long it lasted, which gear component made contact, or whether the same habitat was contacted repeatedly. This absence of monitoring leaves critical state waters habitat at risk, which in turn threatens the productivity of Alaska's fisheries.

Recommended action

The BoF has two potential courses of action: (1) prohibit trawling in areas currently closed to bottom trawling unless a vessel operator can demonstrate compliance with pelagic trawl regulations; or (2) give notice of its intent to amend the existing regulations to require seafloor-contact monitoring systems and seek the necessary authority. ALFA requests that the Board pursue one or both of these options to address the compliance gap and protect seafloor habitat. If the BoF chooses not to pursue either approach, ALFA urges it to commit to an alternative process, with a clear timeline, for addressing ongoing concerns about the State's ability to monitor and enforce existing protections against seafloor contact by pelagic trawl gear.

At its March meeting, the BoF also considered Proposal 165, which addressed the use of salmon excluders to reduce salmon bycatch in pelagic trawl fisheries. Salmon are a statewide resource with profound cultural, economic, and food-security importance. Salmon taken as bycatch represent fish that could otherwise contribute to subsistence, sport, and commercial harvest opportunities, spawning escapement, or stock rebuilding. As changing ocean conditions place additional pressure on salmon populations, reducing avoidable bycatch is an important tool for supporting salmon conservation and stewardship. ALFA encourages the BoF to advance the use of ADF&G-approved salmon excluders on pelagic gear in state waters.

In closing, ALFA urges the BoF to recommit to the existing pelagic trawl definition, take action to verify compliance, and advance measures to reduce salmon bycatch. Until such action is taken, Alaska's nearshore habitat remains at risk.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
Executive Director



Emily Scott
Outreach Coordinator



October 13, 2026

Re: Alaska Board of Fisheries Work Session

Dear members of the Alaska Board of Fisheries,

On behalf of the Alaska Marine Community Coalition (AMCC), thank you for the opportunity to comment at the Alaska Board of Fisheries' (Board) Work Session. Specifically, to comment on pelagic trawl gear standards in the State of Alaska (State). AMCC is a fishermen-founded organization working to advance sustainable fisheries, healthy marine ecosystems, and thriving fishing communities across Alaska. Our work is grounded in the principle that fisheries management must be ecologically credible, publicly accountable, and responsive to the communities whose food security, economies, and ways of life depend on healthy fish populations and functioning habitat.

AMCC asks the Board to: (1) affirm that the existing pelagic trawl regulations prohibit the net, trawl doors, and other trawl-spreading devices from operating in contact with the seabed; (2) identify the monitoring, data-retention, and enforcement requirements needed to verify compliance with a no-bottom-contact standard; (3) clarify the Board's authority under AS 16.05.251 to establish monitoring and technology requirements necessary to verify compliance with that prohibition; and (4) schedule the appropriate action for the next Board meeting. Enforcing existing gear standards through objective monitoring upholds regulatory integrity, provides clear expectations for fishermen, protects compliant fishing practices, and safeguards seafloor habitat and the ecological relationships that sustain Alaska's fisheries and fishing communities. Before discussing each in turn, AMCC will first provide background on pelagic trawl gear fishing in or near state waters.

I. BACKGROUND

“Pelagic trawl gear” has historically been branded as, and understood to be, mid-water fishing. However, the well-documented reality is that pelagic trawl gear regularly touches the bottom.¹ In state regulation, “pelagic trawl gear” is defined as a trawl in which the net, trawl doors, or other trawl-spreading device “do not operate in contact with the seabed and that lacks protective devices, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed.”² State regulations distinguish pelagic trawl gear from other trawl gear partly by how it operates in the water in relation to the seafloor. That distinction has practical consequences because some state waters allow pelagic trawling while closing them to nonpelagic trawling.³ Additionally, near and in state waters presents plentiful pelagic trawling opportunities, particularly in the Gulf of Alaska (GOA) and the Bering Strait and Aleutian Islands (BSAI). This occurs, for example, during parallel fishing seasons (i.e., parallel fisheries), which allow vessels to fish for groundfish in state waters with the same seasons as the federal fisheries.⁴

A. Gulf of Alaska (GOA)

Trawling occurs in state waters in the Gulf of Alaska (GOA). From 2021 through 2025, during the parallel groundfish fisheries, 46 trawl vessels made 1,038 pollock landings in the Central GOA (CGOA), including the Kodiak and Chignik Areas.⁵ Approximately 6.6% of the reported pollock harvest occurred in state waters.⁶ During this same period, 31 vessels made 385 pollock landings in the Western Gulf of Alaska (WGOA), including the South Alaska Peninsula Area

¹ For fisheries managed at the federal level, the North Pacific Fishery Management Council (Council) recognizes substantial modeled seafloor contact by pelagic trawl gear and repeatedly identifies the need for improved technology and enforceable standards to quantify contact. N. PAC. FISHERY MGMT. COUNCIL, PELAGIC TRAWL GEAR INNOVATION DISCUSSION PAPER 10–12, 15–21, 23 (May 17, 2025) [hereinafter PELAGIC TRAWL GEAR DISCUSSION PAPER], <https://meetings.npfmc.org/CommentReview/DownloadFile?p=33e22a78-be45-4d77-baf6-82fe978728fb.pdf&fileName=C3b%20Pelagic%20Trawl%20Gear%20Innovation%20Discussion%20Paper.pdf>. While the Council does not set contact limits in state waters, the Council understands that pelagic trawl gear can contact the seafloor and, in federal fisheries, is known to do so.

² 5 AAC 39.105(d)(10)(C).

³ *Pelagic and Bottom Trawl Open and Closed Areas in AK State Waters*, OCEANA, https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/state/rcs/rc135_Oceana_Pelagic_and_bottom_trawl_open_and_closed_areas_in_AK_state_waters_proposals_163-165.pdf (last visited Oct. 7, 2026).

⁴ *Information by Fishery*, ALASKA DEP’T. OF FISH AND GAME, <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyfisherygroundfish.main> (last visited Oct. 13, 2026).

⁵ STAFF COMMENTS ON COMMERCIAL, PERSONAL USE, SPORT AND SUBSISTENCE REGULATORY PROPOSALS, ALASKA DEP’T. OF FISH AND GAME 30, 33 (Mar. 2026) [hereinafter “ADF&G STAFF COMMENTS”], https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/state/adfg-staff-comments_2-27-26.pdf.

⁶ *Id.*

(SAP), where approximately 24.4% of the reported pollock harvest occurred in the state waters.⁷ Pelagic trawling also occurs in the Prince William Sound state-pollock fishery.⁸

In 2024, during the parallel season, approximately 33% of the CGOA Pacific cod harvest was taken from state waters, and approximately 45% of the WGOA harvest was taken from state waters.⁹ In Kodiak (located in the CGOA), while trawl gear vessels did not harvest the largest proportion, they still harvested 7% (193,084 pounds) of Pacific cod.¹⁰ In Chignik, which is primarily in the CGOA (with a small portion in the WGOA), there was no Pacific cod trawl harvest.¹¹ However, in the SAP (located in the WGOA), during the parallel season, trawl gear vessels harvested the largest proportion of the Pacific cod harvest at 82% (1,096,300 pounds).¹² In 2025, for the GOA, the trawl catch is shown in Figure 1 and Figure 2 below, with catch represented nearshore.

⁷ *Id.*

⁸ *Id.* at 30, 34 (“Other areas of Alaska (e.g., Cook Inlet, Prince William Sound, Southeast Alaska, etc.) do not allow for parallel groundfish fisheries and therefore no trawl gear vessels operate inside state waters, except during the Prince William Sound state-waters pollock fishery.”).

⁹ CASSANDRA WHITESIDE AND ANNIE LOOMAN, ANNUAL MANAGEMENT REPORT FOR GROUND FISH FISHERIES IN THE KODIAK, CHIGNIK, AND SOUTH ALASKA PENINSULA AREAS, 2024 2–3 (Sept. 2025), <https://www.adfg.alaska.gov/FedAidPDFs/FMR25-26.pdf>

¹⁰ *Id.* at 20.

¹¹ *Id.* at 21.

¹² *Id.* at 22.

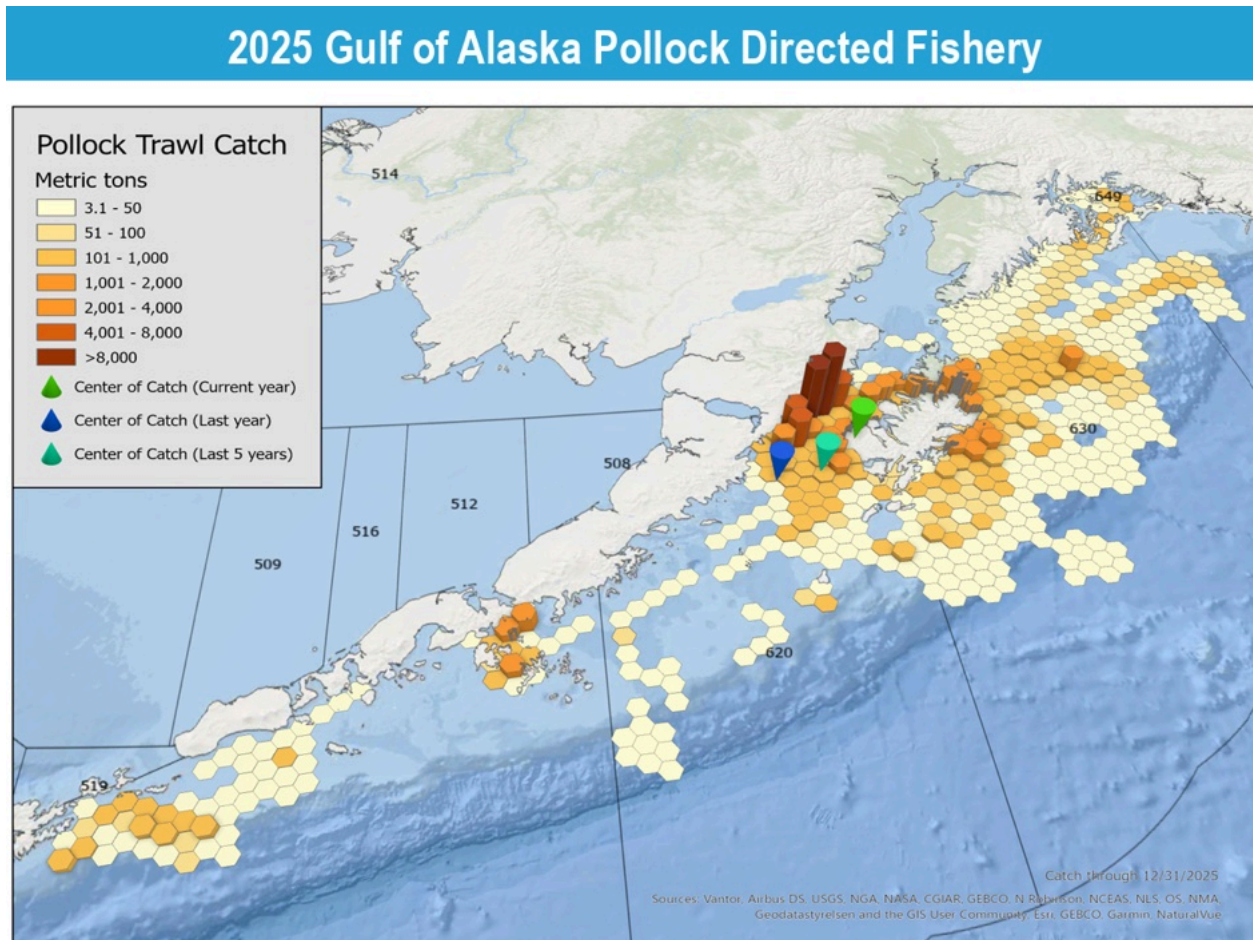
FIGURE 1: 2025 GULF OF ALASKA POLLOCK DIRECTED FISHERY¹³

Figure 1 shows where pounds were caught, but it does not show the fishing “effort”—i.e., the numbers of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. It also does not distinguish between pelagic or nonpelagic trawl.

¹³ GOA Inseason Management Report 2025, NOAA FISHERIES, <https://www.fisheries.noaa.gov/s3/2026-01/GOA-Inseason-Report-akro.pdf> (last visited Oct. 12, 2026).

FIGURE 2: 2025 GULF OF ALASKA PACIFIC COD CATCH BY TRAWL GEAR¹⁴

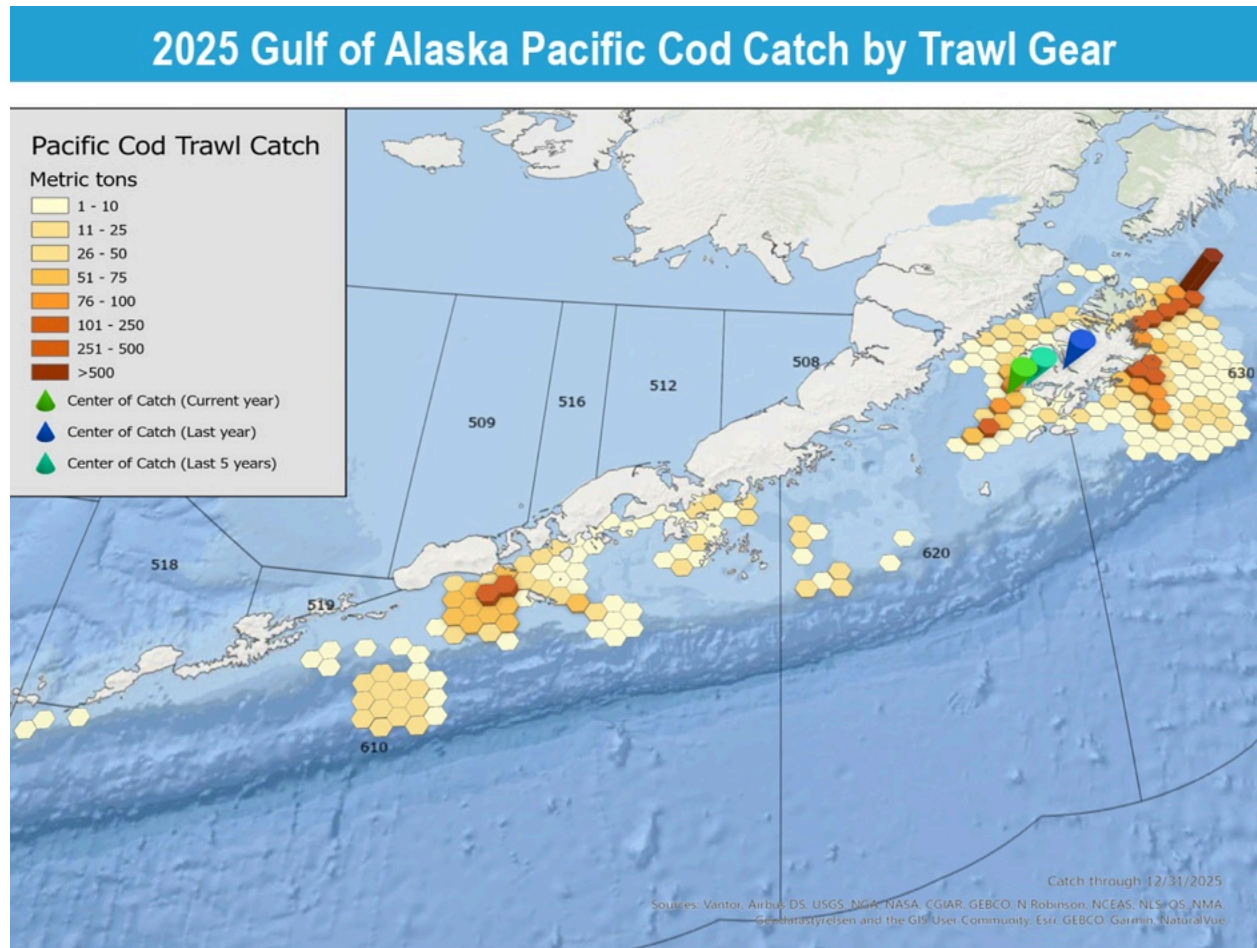


Figure 2 shows where pounds were caught, but it does not show the number of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. It also does not distinguish between pelagic or nonpelagic trawl.

¹⁴ *Id.*

B. Bering Sea and Aleutian Islands (BSAI)

Trawling also occurs in the BSAI. In 2024 during the parallel fishery, for Pacific cod, 36 trawl vessels made 75 landings and caught 1,157,379 pounds.¹⁵ For Walleye pollock, 36 trawl vessels made 143 landings and caught 4,493,090 pounds.¹⁶ For Pacific Ocean Perch, 122 trawl vessels made 27 landings and caught 172,724 pounds.¹⁷ In 2025, the catch for BSAI harvest and location is shown below in Figures 3–7.

¹⁵ ASIA BEDER AND JANIS SHAISHNIKOFF, ANNUAL MANAGEMENT REPORT FOR GROUND FISH FISHERIES IN THE BERING SEA-ALEUTIAN ISLANDS MANAGEMENT AREA, 2024 7, 22 (August 2025), <https://www.adfg.alaska.gov/FedAidPDFs/FMR25-20.pdf>.

¹⁶ *Id.* at 23.

¹⁷ *Id.* at 24.

FIGURE 3: A SEASON BERING SEA POLLOCK DIRECTED FISHERY (CP)¹⁸

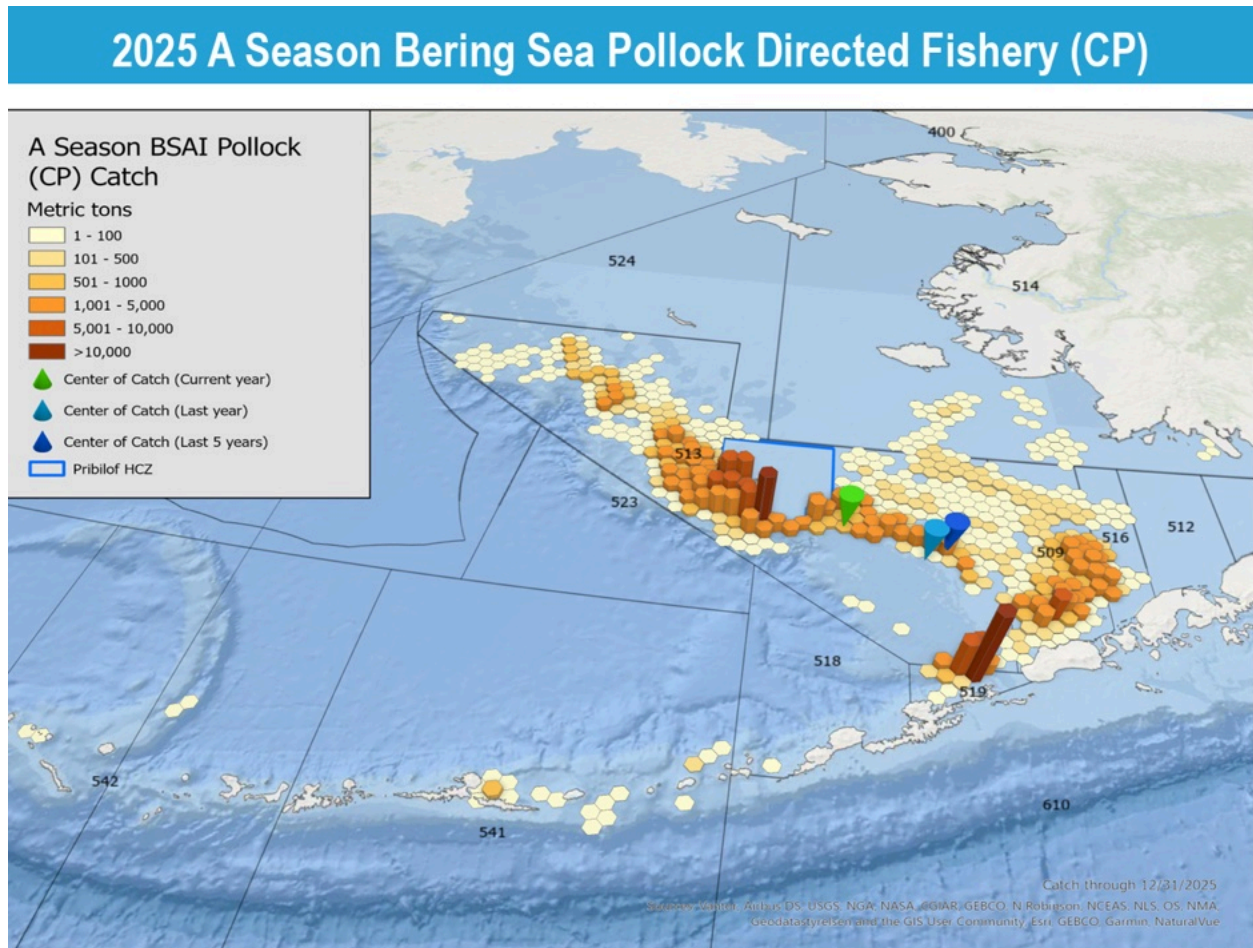


Figure 3 shows the distribution of 2025 A season Bering Sea Pollock catch by catcher processor (CP) trawl vessels. This map shows where pounds were caught, but it does not show the numbers of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. A season runs from January 20th to June 10th.

¹⁸ BSAI Inseason Management Report 2025, NOAA FISHERIES (Dec. 2025), <https://meetings.npfmc.org/CommentReview/DownloadFile?p=17098832-ebcc-42d4-b31e-5c9a2fb8c1a1.pdf&fileName=B2%20BSAI%202025%20Year-end%20Inseason%20Report.pdf>.

FIGURE 4: 2025 A SEASON BERING SEA POLLOCK DIRECTED FISHERY(CV)¹⁹

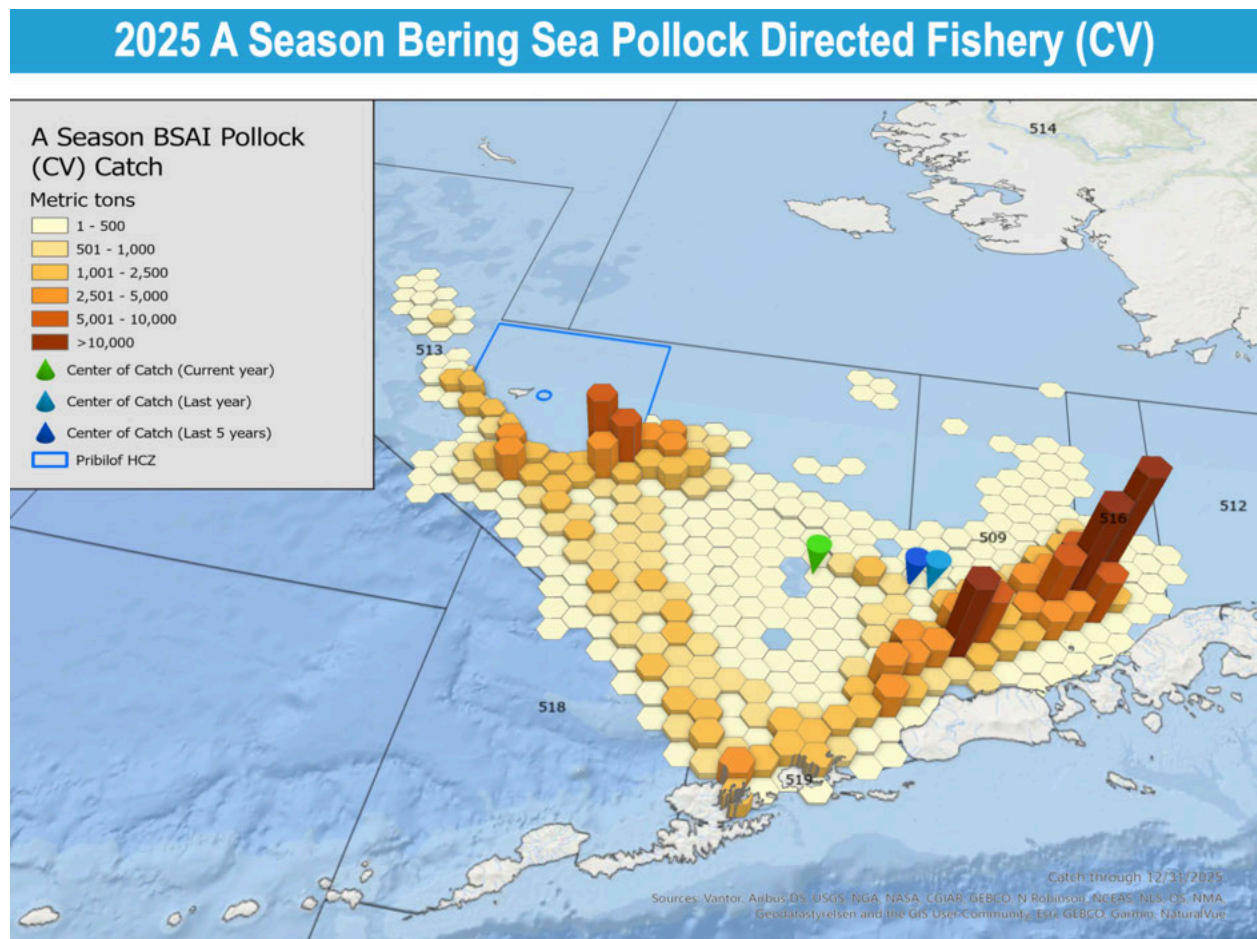


Figure 4 shows the distribution of 2025 A season Bering Sea Pollock catch by catcher vessel (CV) trawl boats. This map shows where pounds were caught, but it does not show the numbers of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. It also does not distinguish between pelagic or nonpelagic trawl. A season runs from January 20 to June 10th.

¹⁹ *Id.*

FIGURE 5: 2025 B SEASON BERING SEA POLLOCK DIRECTED FISHERY (CV)²⁰

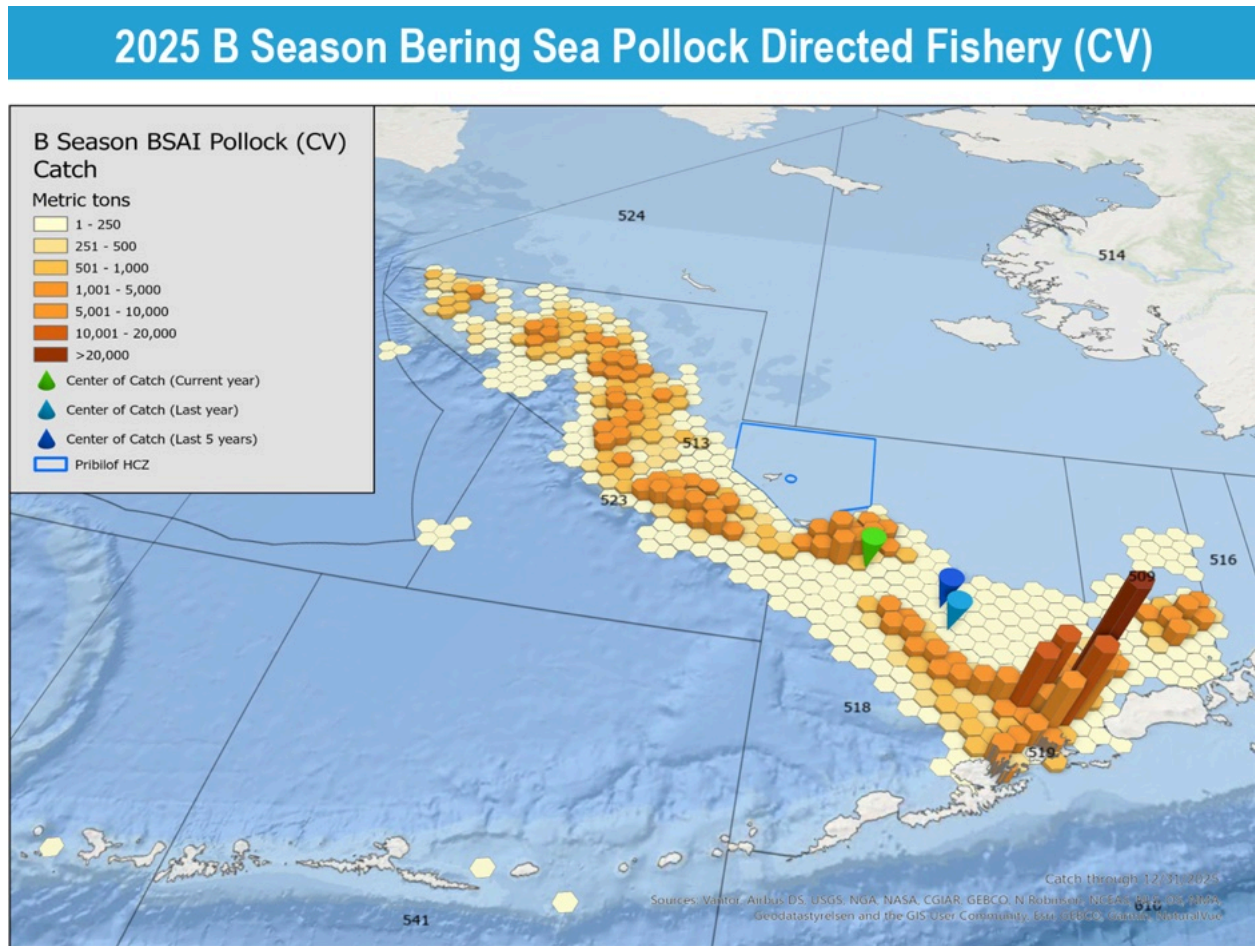


Figure 5 shows the distribution of 2025 B season Bering Sea Pollock catch by CV trawl boats. This map shows where pounds were caught, but it does not show the numbers of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. B season runs from June 10 to December 31.

²⁰ *Id.*

FIGURE 6: 2025 B SEASON BERING SEA POLLOCK DIRECTED FISHERY (CP)²¹

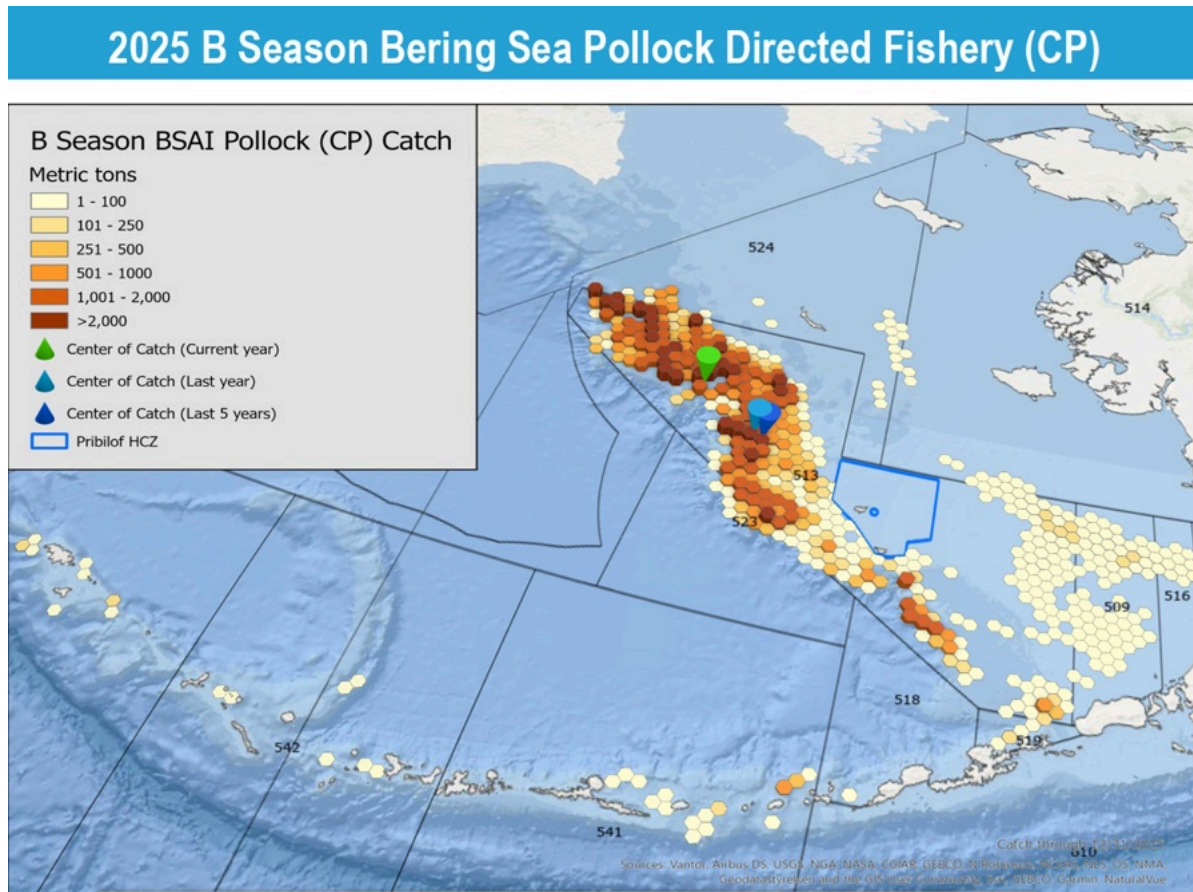


Figure 6 shows the distribution of 2025 B season Bering Sea Pollock catch by CP trawl vessels. This map shows where pounds were caught, but it does not show the numbers of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. B season runs from June 10 to December 31.

²¹ *Id.*

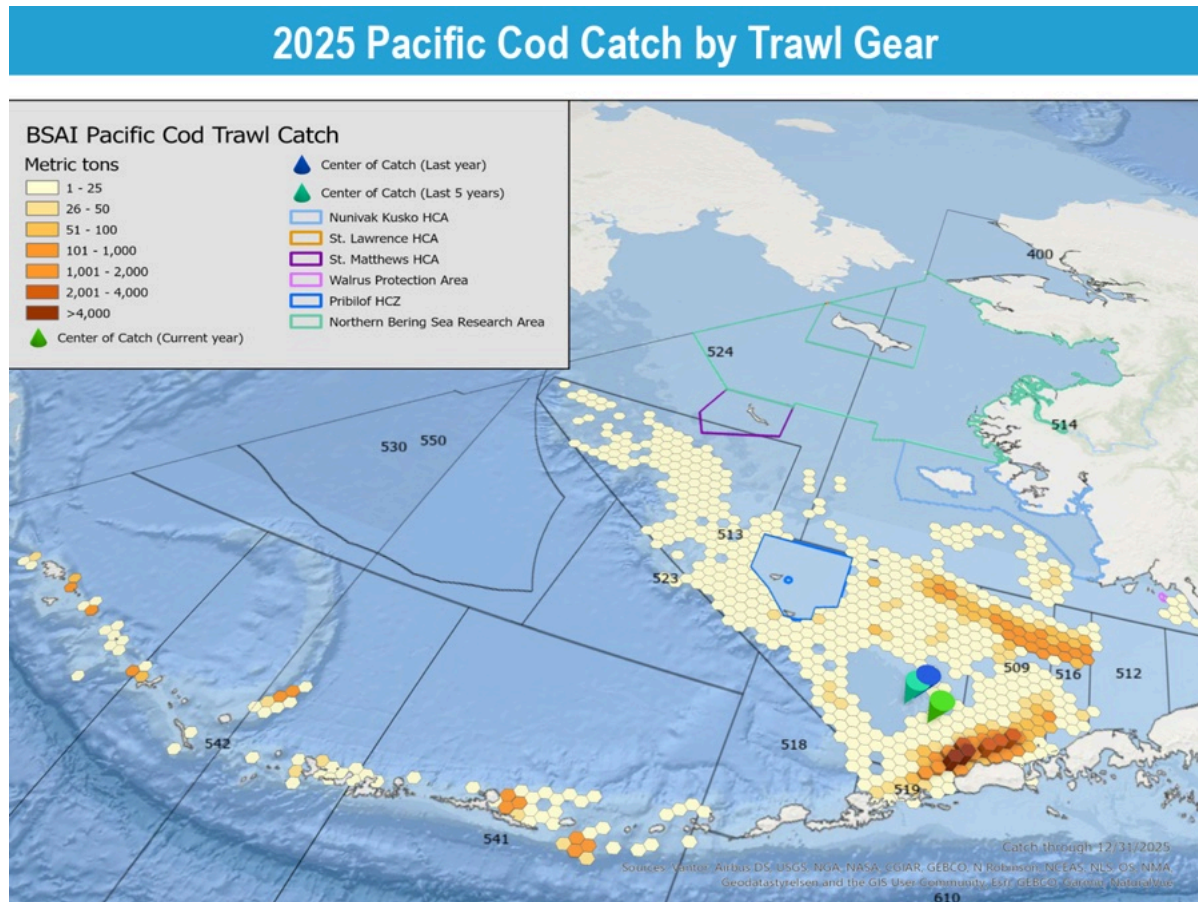
FIGURE 7: 2025 PACIFIC COD CATCH BY TRAWL GEAR²²

Figure 7 shows the distribution of 2025 Bering Sea Aleutian Islands Pacific Cod catch by trawl gear. This map shows where pounds were caught, but it does not show the numbers of tows, tow duration, fishing hours, swept area, or bottom contact required to harvest. It also does not distinguish between pelagic or nonpelagic trawl.

These fisheries—in the GOA and BSAI—are economically important to rural Alaska’s coastal fishing communities. Their long-term sustainability depends on both responsible harvest and effective management. Therefore, the Board must balance fishing opportunity and community needs with protecting marine habitat and the integrity of existing regulations. The first step is to examine what existing regulations require, and determine how those regulations can provide a practical means of verifying compliance.

²² *Id.*

II. ALASKA'S LEGAL DEFINITION OF "PELAGIC TRAWL GEAR" REQUIRES THE NET, TRAWL DOORS, AND OTHER TRAWL-SPREADING DEVICES TO OPERATE WITHOUT CONTACTING THE SEABED, BUT THE REGULATIONS DO NOT SPECIFY HOW TO VERIFY COMPLIANCE.

Under 5 AAC 39.105(d)(10)(C), "pelagic trawl gear" is defined as a trawl in which the net, trawl doors, or other trawl-spreading device "do not operate in contact with the seabed."²³ In addition, 5 AAC 39.105(a) requires fishing gear to be operated in a manner consistent with its basic design. These provisions define pelagic trawl gear by its operation off the seabed and require fishing gear to be operated consistently with its basic design. At a minimum, they establish that bottom contact is directly relevant to whether gear is being operated lawfully as pelagic trawl gear. The Board adopted these provisions pursuant to its authority under AS 16.05.251 to regulate the "means and methods employed in the pursuit, capture, and transport of fish."²⁴ Although the definition of "pelagic trawl gear" prohibits bottom contact, the regulations do not establish an objective means of verifying compliance.

As written, the existing regulations do not establish a reliable, objective means of determining whether pelagic trawl gear has actually contacted the seabed. This creates uncertainty about what the existing pelagic trawl gear definition requires operationally. Which, in effect, restricts the ability of the Alaska Wildlife Troopers (AWT) to determine commercial fishing violations,²⁵ as there is no requirement to have recorded information to determine the frequency, duration, location, or pattern of seabed contact during pelagic trawl operations in state waters. While this creates a practical enforcement challenge, the underlying classification based on bottom contact remains. Thus, AMCC requests that the Board establish a clear, measurable monitoring standard to determine how this gear is operating, verify compliance, and ultimately, enforce the existing prohibition.

²³ In contrast, the current federal regulatory definition of "pelagic trawl gear" does not explicitly state that the gear should not operate on the bottom; rather, in essence, it explains that the gear is not bottom trawl gear. 50 C.F.R. § 679.2. However, an earlier federal "pelagic trawl gear" definition used to prohibit bottom contact, but was changed to remove its bottom-contact provision due to its unenforceability at the time. *See e.g.*, 55 Fed. Reg. 38347, 38354 (Sept. 18, 1990), <https://tile.loc.gov/storage-services/service/ll/fedreg/fr055/fr055181/fr055181.pdf#page=49> ("The current definition of a pelagic trawl . . . means a trawl on which neither the net nor the trawl doors (or other trawl-spreading device) operates in contact with the seabed, and which does not have attached to it protective devices, such as rollers or bobbins, that would make it suitable for fishing in contact with the seabed.").

²⁴ AS 16.05.251(a).

²⁵ Without adequate monitoring, AWT may lack the evidence needed to establish the nature and circumstances of seabed contact and assess the appropriate enforcement response. *See* AS 16.05.722 (strict liability commercial fishing penalties); AS 16.05.723 (misdemeanor commercial fishing penalties). An isolated incident of seabed contact, including contact resulting from an emergency, equipment failure, or accident, may present different enforcement considerations than negligent or sustained contact during fishing.

III. THE BOARD SHOULD IDENTIFY THE MONITORING, DATA-RETENTION, AND ENFORCEMENT REQUIREMENTS NEEDED TO VERIFY COMPLIANCE WITH 5 AAC 39.105(d)(10)(C).

The Board should determine what information is necessary to determine compliance and whether it should be recorded. This includes monitoring and technology requirements to determine whether pelagic trawl gear is being operated consistently with 5 AAC 39.105(d)(10)(C).²⁶ For example, continuously recording sensors or other technology could objectively verify whether the net, trawl doors, or other trawl-spreading devices contact the seabed.²⁷ Bottom-contact sensors may be one component of that system, but the Board should allow technologies or combinations of technologies that provide equivalent or better verification. Other information, including gear-depth data, vessel position, bathymetry, and net geometry, may supplement or provide additional verification.

Further, questions concerning sensor placement, calibration, data storage, equipment failure, enforcement access, cost, and implementation are legitimate technical issues. With this in mind, the Board may find it appropriate to put a phase-in date in any solution to allow for development and testing in a timely manner. Any pilot or phase-in should have clear objectives, deliverables, and a binding timeline leading to regulatory action. Ultimately, though, seafloor-contact technology could provide a mechanism to monitor and enforce the Board's existing regulation prohibiting bottom contact by pelagic trawl gear. Thus, AMCC supports technical development, pilot testing where necessary to answer defined questions, and phased implementation where appropriate, as well as the time needed to accomplish those things successfully.

If, during the Joint Protocol Committee and Work Session processes, the Board concludes it lacks the statutory or regulatory authority to establish pelagic trawl gear standards and/or decides another state entity must implement part of the program, it should formally request that action and establish a coordination process. If a question of authority to regulate remains, the Board should identify it precisely and request that the Legislature clarify it.²⁸

²⁶ AMCC believes the Board already has the authority to establish monitoring and technology requirements that would make these regulations practically enforceable under AS 16.05.251.

²⁷ See e.g., PELAGIC TRAWL GEAR DISCUSSION PAPER, *supra* note 1, at (discussing models, tilt sensors, physical proxies, acoustic sensors, cameras, salmon excluders, among other innovations).

²⁸ In 2025, the Board informed the Alaska Legislature that it believed it lacked authority to require electronic monitoring (EM) on fishing vessels and requested legislative action to provide that authority to the Alaska Department of Fish & Game (ADF&G) Commissioner. The Legislature subsequently enacted H.B. 117 in 2026, authorizing the ADF&G Commissioner to establish an EM program for certain fishing vessels operating in state waters. See Letter from Alaska Board of Fisheries to Senator Stevens and Representative Edgmon, Alaska Legislature (Mar. 15, 2025), <https://static1.squarespace.com/static/62cca323b85faf15e3ca3ce8/t/67f69720b1bcad44ac069101/1744213793767/Letter+from+the+Board+of+Fisheries+to+the+Alaska+State+Legislature+3.15.25.pdf>; H.B. 117, 34th Leg., 2nd Reg. Sess. (Alaska 2026) (final version), <https://www.akleg.gov/PDF/34/Bills/HB0117Z.PDF>. This provides a recent example of the Legislature assigning the appropriate agency authority after the Board determined that its existing statutory authority was insufficient.

IV. IF THE BOARD DETERMINES IT HAS THE AUTHORITY, THE BOARD SHOULD TAKE ACTION TOWARD ESTABLISHING ENFORCEABLE PELAGIC TRAWL GEAR STANDARDS AT ITS NEXT MEETING. DOING SO WILL ENSURE REGULATORY INTEGRITY AND PROTECT ALASKA'S MARINE HABITAT.

The Joint Protocol Committee and Work Session information-gathering process should now lead to a defined next step toward establishing monitoring and technology requirements necessary to verify 5 AAC 39.105(d)(10)(C) compliance.²⁹ At its next meeting, the Board should take action toward establishing an enforceable pelagic trawl gear standard.

In the past, groups have presented solutions to the Board on this exact matter. During the March 17-21, 2026, Board Statewide Finfish and Supplemental Issues meeting, the Board considered Proposal 163 and Proposal 164.³⁰ Proposal 163 would have defined all trawl gear operated inside state waters as “non-pelagic” and developed new performance and monitoring standards to allow pelagic trawling to occur on a case-by-case basis.³¹ Proposal 164 would have established bottom contact monitoring requirements for pelagic trawl gear operated inside state waters.³² The Board voted 7-0 to take no action on both proposals.³³

While the Board members initially voted to take no action, it was because Board members said they needed more information and coordination before deciding how to proceed. The Board identified the Joint Protocol process as one mechanism to obtain that information and return the issue to the Board Work Session. AMCC supported gathering additional technical information and respected the Board's request for more time. Now, after the Joint Protocol Committee meeting, the Board should be better equipped to take next steps toward establishing an enforceable pelagic trawl gear standard in Alaska.

²⁹ Further, the Alaska Department of Fish and Game (ADF&G) staff recommended, in its March 2026 comments, additional coordination across the Council, National Marine Fisheries Service (NMFS), state, and federal fishery stakeholders, and state/federal fisheries law enforcement agencies. ADF&G STAFF COMMENTS, *supra* note 5.

³⁰ Alaska Board of Fisheries, *Statewide Finfish and Supplemental Issues (3/20/2026)*, YOUTUBE (Mar. 20, 2026) (timestamp 2:56:41), https://www.youtube.com/watch?v=ZVlo6PqfEYE&list=PLewFHBqt_nWm2IDjA25GnxXXHZ2BHKD3m&index=5.

³¹ The Alaska Healthy Habitat Alliance, *Proposal 163*, ALASKA DEP'T. OF FISH AND GAME (proposing to amend 5 AAC 39.105), <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesbBoard'soard/pdfs/2025-2026/proposals/163.pdf> (last visited Sept. 22, 2026).

³² The Alaska Healthy Habitat Alliance, *Proposal 164*, ALASKA DEP'T. OF FISH AND GAME (proposing to amend 5 AAC 39.105), <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/proposals/163.pdf> (last visited Sept. 22, 2026).

³³ Alaska Board of Fisheries, *Statewide Finfish and Supplemental Issues (3/20/2026)*, YOUTUBE (Mar. 20, 2026) (timestamp 2:56:41), https://www.youtube.com/watch?v=ZVlo6PqfEYE&list=PLewFHBqt_nWm2IDjA25GnxXXHZ2BHKD3m&index=5.

Establishing an enforceable pelagic trawl standard ensures regulatory integrity. Regulatory integrity requires the State to apply and enforce the distinctions in its own regulations. Where uncertainty exists, a precautionary approach calls for objective information and clear standards rather than leaving potentially consequential activity unverified. The existing regulation clearly distinguishes between pelagic and nonpelagic gear. The State now needs a credible way to apply and enforce that distinction.

That regulatory integrity matters because Alaska's fisheries depend on functioning marine habitat. Seafloor habitats support benthic organisms, prey resources, juvenile life stages, and ecologically important areas used by commercially, recreationally, and culturally significant species. As ocean conditions change, protecting functioning habitat is one of the most direct ways the State can support the productivity and resilience of fisheries under its jurisdiction. Monitoring is a basic precautionary measure that helps the State understand how gear operates, protect sensitive habitats, and adapt management as better information becomes available.

V. CONCLUSION

Compliant pelagic trawling is a legal fishing method. However, gear classified and regulated as pelagic should be operated and verified as pelagic. Monitoring protects habitat and compliant operators alike by distinguishing lawful pelagic fishing from operations that do not meet the applicable standard. It gives operators clearer expectations and protects them from unsupported allegations. Alaska requires fishermen across all gear groups to comply with detailed gear specifications, closed areas, reporting requirements, retention rules, and operational standards. Pelagic trawl operators should likewise have a clear, workable, and objectively enforced standard.

Importantly, AMCC is *not* asking the Board to prohibit pelagic trawling. Rather, AMCC is advocating for *compliant* pelagic trawling. AMCC believes the Board has existing statutory authority under AS 16.05.251 to establish monitoring and technology requirements for pelagic trawl gear. Further, the Board's existing regulations—5 AAC 39.105(d)(10)(C) and 5 AAC 39.105(a)—already prohibit pelagic trawl gear from operating in contact with the seabed. However, the absence of a reliable monitoring mechanism creates a practical enforcement gap. To fill this gap, the Board should use the Work Session and Joint Protocol meetings to answer the Board's remaining technical and informational questions. Then, the Board should act. Alternatively, if the Board determines that it lacks the statutory authority to establish the necessary monitoring requirements, it should immediately request legislative action to provide that authority. The Board should act to ensure that "pelagic" means what Alaska's regulations already say it means: no contact with the seabed. The Board should verify and enforce that requirement to protect Alaska's marine habitat and ensure regulatory integrity in state waters.

Thank you for considering AMCC's comments.

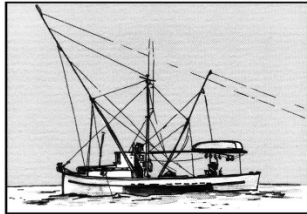
Sincerely,

A handwritten signature in cursive script that reads "Michelle Stratton".

Michelle Stratton
Executive Director

A handwritten signature in cursive script that reads "Lancee Whetman".

Lancee Whetman
Fisheries Program Manager



ALASKA TROLLERS ASSOCIATION

130 SEWARD #205

JUNEAU, AK 99801

AKTROLLERS@GMAIL.COM

10/9/2026

Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

Re: Opposition to Statewide Provisions of ACR 13

Chair and Members of the Alaska Board of Fisheries,

The Alaska Trollers Association submits these comments regarding ACR 13.

Southeast Chinook fisheries are managed under the Pacific Salmon Treaty, with established systems for estimating encounters and incidental mortality associated with released Chinook. That management is further influenced by gear allocations, conservation measures, and protections for Southeast Chinook stocks designated as Stocks of Concern. Changes to retention requirements can affect mortality, Treaty accounting, conservation measures, allocations, and fishing opportunities.

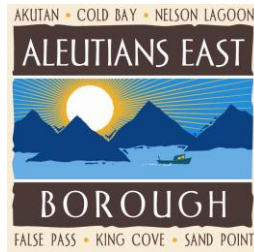
Changes of this nature affecting Southeast Alaska salmon fisheries should be considered through the regular Southeast Board process, with full consideration of Pacific Salmon Treaty obligations, the existing incidental mortality accounting system, and management of Southeast Stocks of Concern.

ATA does not support the statewide retention provisions proposed in ACR 13.

Thank you for considering these comments.

Patrick Baum

President



October 9, 2026

Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: AEB Support for ACR 12 and Opposition to ACRs 6, 7, 8, 9, 10, 11 and 13.

Dear Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries,

The Aleutians East Borough Assembly met October 8, 2026 and adopted Resolution 27-23 “*A Resolution of the Aleutians East Borough Assembly in Support of Agenda Change Request 12 to Benefit Local Set Net Fishermen and Opposing Agenda Change Requests 6, 7, 8, 9, 10, 11 and 13 that would Harm Alaska Peninsula Fishermen and Salmon Conservation Efforts.*”, attached to this letter.

Support for ACR 12 to allow commercial fishing for salmon with set gillnet gear in the Southeastern District Mainland concurrent to commercial fishing periods for salmon in the Chignik Management Area.

The Assembly joins local fishing associations in support of Agenda Change Request 12 submitted by Sand Point set net salmon fisherman, Ben Mobeck Sr. Local South Alaska Peninsula set net fishermen have been experiencing very poor salmon seasons recently. Both the 2024 and 2025 set net Sockeye salmon June harvests for the South Alaska Peninsula were 65% below the previous 5-year 2019-2023 season average harvests. Preliminary data demonstrates the June 2026 Sockeye salmon harvest for the South Alaska Peninsula set net gear fleet was 81% below the 10-year 2016-2025 average harvest. The Assembly adopted [Resolution 27-09](#)¹ in August, requesting the Governor support a fishery disaster declaration for the 2026 Alaska Peninsula set net salmon fishery.

We believe ACR 12 is a possible solution to the problem our local set net fishermen are faced with: not being able to even pay for insurance or fuel for the June season. Set net fishermen take a small percentage of overall harvest. Allowing these fishermen to fish in the Southeastern District Mainland when Chignik fishing is open would make these set net businesses more viable, without compromising Chignik Sockeye salmon conservation efforts.

¹ <https://www.aleutianseast.org/wp-content/uploads/2026/08/RESOLUTION-27-09.pdf>

Opposition to ACRs 6 and 7 that would establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear in the South Unimak and Shumagin Islands June Salmon Management Plan.

ACRs 6 and 7 would reinstate Proposal 127/RC 245 to increase South Alaska Peninsula June salmon fishing season closures. This is one of five proposals voided by the Alaska Attorney General due to alleged Ethics Act violations by Board of Fisheries member(s). This action would severely restrict the South Alaska Peninsula June salmon fishery, and eliminate the Chum salmon harvest triggers currently in place to limit Chum harvest. Adopting one of these ACRs would make the successful Area M Seiners Adaptive Management program² impossible to prosecute.

Opposition to ACRs 8, 9 and 10

ACRs 8, 9 and 10 would also reinstate proposals voided by the Alaska Attorney General(AG) after the Native Village of Unga filed an Ethics Act complaint against several Board of Fisheries members with the AG's office, and the Aleutians East Borough, along with Unga and two groups of local Area M fishermen filed a lawsuit alleging Ethics Act violations by Board members. In each of these ACRs, the submitters complain that the AG process to void these proposals lacked transparency. However, the remedy for that complaint lies with the Alaska courts, not in the ACR process. Regardless, under the Executive Branch Ethics Act under AS 39.52.350, "the complaint and all other documents and information regarding an investigation conducted under this chapter or obtained by the attorney general during the investigation are confidential and not subject to inspection by the public." **The subject of a complaint may, in writing, waive confidentiality.**³ If the AG's decision to void the regulations was based on the alleged Ethics Act violations, the lack of transparency is the product of the AG's office following the law.

Each of these ACRs would hurt Alaska Peninsula salmon fishing businesses, including ACRs 9 and 10 to force gillnet and seine reductions in size, net modifications that would be costly to fishermen.

Opposition to ACRs 11 and 13 that would require full retention of Chinook Salmon

The Aleutians East Borough working with the ADFG have been conducting a salmon tagging study using satellite tags to investigate the post-release survival of Chum and Chinook salmon released from seine vessels in the South Peninsula June fishery. This study is preliminary but has shown that safe release of Chum and Chinook is possible, and when 'every salmon counts' could be a great contribution to overall salmon conservation. The Borough continues to support the language adopted in Proposal 135/RC 149 at the February Board meeting.

² Area M Seiners Adaptive Management Report
<http://www.aebfish.org/AreaMSeinersAdaptiveFleetManagement2026Report.pdf>

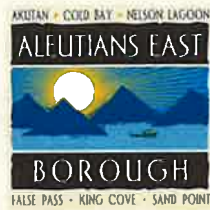
³In The Superior Court for the State of Alaska Third Judicial District at Anchorage Case No. 3AN-26-05959CI
 STIPULATION AND PROTECTIVE ORDER FOR CONFIDENTIAL INFORMATION dated April 30, 2026

Thank you for the opportunity to comment on the Agenda Change Requests for the 2026/2027 Board meeting cycle. The Aleutians East Borough urges the Board to accept ACR 12 and reject ACRs 6, 7, 8, 9, 10, 11 and 13.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alvin D. Osterback". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alvin D. Osterback
Mayor Aleutians East Borough



RESOLUTION 27-23

A RESOLUTION OF THE ALEUTIANS EAST BOROUGH ASSEMBLY IN SUPPORT OF AGENDA CHANGE REQUEST 12 TO BENEFIT LOCAL SET NET FISHERMEN AND OPPOSING AGENDA CHANGE REQUESTS 6, 7, 8, 9, 10, 11 AND 13 THAT WOULD HARM ALASKA PENINSULA FISHERMEN AND SALMON CONSERVATION EFFORTS.

WHEREAS, the Alaska Board of Fisheries will consider Agenda Change Requests to their 2026/2027 meeting cycle, at their October 28-29, 2026 Work Session, and

WHEREAS, Agenda Change Request 12 would allow Alaska Peninsula set net gear fishermen to fish in the Southeastern District Mainland, that is part of the Chignik Management Area allocation, when Chignik fishermen are fishing, and

WHEREAS, the Aleutians East Borough Assembly has requested a fishery disaster determination for these local set net fishermen based on the last three disastrous salmon fishing seasons, in AEB Resolution 27-09, and

WHEREAS, Agenda Change Request 12 would alleviate some economic distress on these local set net fishermen with minimal impact to Chignik Sockeye salmon stocks, and

WHEREAS, Agenda Change Requests 6, 7, 8, 9 and 10 attempt to reinstate proposals from the February 2026 Board of Fisheries meeting that were voided by the Alaska Attorney General and would harm Alaska Peninsula fishermen and conservation measures by those fishermen, and

WHEREAS, Agenda Change Requests 6 and 7 would substantially diminish the productivity of the Area M June salmon fishery, and essentially end the successful adaptive management measures by Area M fishermen to conserve Chum salmon, and

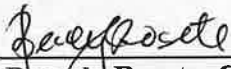
WHEREAS, Agenda Change Requests 11 and 13 would require full retention of all Chinook salmon, when safe release of salmon under certain conditions has been proven to be an effective salmon conservation tool.

NOW THEREFORE BE IT RESOLVED, the Aleutians East Borough Assembly urges the Alaska Board of Fisheries to accept Agenda Change Request 12 to benefit distressed Area M set net fishermen, and

BE IT FURTHER RESOLVED, the Aleutians East Borough Assembly urges the Alaska Board of Fisheries to oppose Agenda Change Requests 6, 7, 8, 9, 10, 11 and 13, that would impede local fishing conservation efforts and harm local Aleutians East Borough fishermen.

PASSED AND APPROVED by the Aleutians East Borough on this 8th day of October, 2026.


Alvin D. Osterback, Mayor

ATTEST: 
Beverly Rosete, Clerk

Comments of Area M Seiners Association to Agenda Change Requests
October 13, 2026

The Area M Seiners Association submits these comments on Agenda Change Requests (ACRs) 6 through 11 and 13. The ACRs ask the Board of Fisheries to consider these out-of-cycle changes to reinstate regulations that were administratively voided by the Department of Law for failing to adhere to State law. However, the ACRs do not meet Board policy for agenda change requests. Under 5 AAC 39.999(a)(1), the Board will, in its discretion, change its schedule for consideration of a proposed regulatory change in response to an agenda change request only for a fishery conservation purpose or reason, to correct an error in a regulation, or 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 information found by the Board to be compelling. 5 AAC 39.999(a)(2). These limitations on ACRs reflect “the importance of public participation in developing management regulations” and the Board’s recognition that “public reliance on the predictability of the normal board process is a critical element in regulatory changes.” 5 AAC 96.625(e). **Below we address the ACRs and the specific reasons why they do not meet the ACR criteria.**

More fundamentally, these proposals unfortunately repeat tired rhetoric and falsehoods about the Area M fishery without doing any independent research or scientific analysis. A few individuals who are bent on destroying the Area M commercial fishery have succeeded in convincing various Native organizations and committees to parrot untrue and unverified assumptions blaming the Area M fishery for the decline of certain CWAK chum salmon stocks. At this point, the fervor to restrict Area M fisheries demonstrated by certain individuals and organizations can only be described as punitive: a desire to punish Area M fishermen that is completely unrelated to any fishery management or conservation purpose. The Board should step back from this witch hunt and allow sound fisheries management embodied by the 2023 Area M management plans to continue working.

- 1. ACRs 6 and 7: Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear in the *South Unimak and Shumagin Islands June Salmon Management Plan* (5 AAC 09.365) / Submitted by Orutsararmiut Native Council and Fairbanks Advisory Committee**

These ACRs, seeking to reinstate voided Proposal 127 (RC245), do not meet any of the 5 AAC 39.999(a)(1) criteria, and cannot be accepted under 5 AAC 39.999(a)(2) because they are “predominantly allocative in nature” and there is no compelling new information.

(A) Fishery conservation purpose or reason.

ACRs 6 and 7 do not have a fishery conservation purpose. 5 AAC 39.999(a)(1)(A). The proposal these ACRs seek to reinstate would reduce commercial fishing time and area open to Area M salmon permit holders based on a set schedule. Area M fishermen have already adopted a successful adaptive management plan resulting in the seine fleet avoiding fishing in areas and times of high chum salmon abundance. The adaptive management program is effective because there is 100% fishermen participation, processors enforce compliance rules, and satellite and phone app communications are used by all and conducted in real time. Therefore, decisions to stand down from fishing in specific areas due to high densities of chum salmon are immediate and conveyed to all fishermen, and ADF&G. The full scope of the adaptive management plan can be seen in RC104 from the 2023 meeting. In summary, fishermen elect a board of active fishermen that manage and communicate with a subset of the permit holders fishing. The leader gets input on harvest composition by time and area; if chum densities are deemed too high, they call a “stand down” that is communicated to the entire fleet. In some cases, fishing may continue in other areas where sockeye are abundant and chum numbers low. Fishermen sacrifice significant fishing time due to stand downs, beyond the regulation-mandated closures.

It is unfortunate that the proponents of these ACRs cannot admit what is plainly evident from the data: the adaptive management plan works far better than scheduled closures because it adapts fishing time and area based on the actual presence of chum salmon—something that no set fishing schedule can successfully predict. ADF&G, in its comments to the Board before the February 2026 meeting, agreed that current restrictions combined with the adaptive management plan have effectively reduced the CWAK-bound chum salmon harvest. But shortening fishing time undermines the cooperative, proactive, industry-led measures that have successfully reduced harvest. One important aspect of the adaptive management program is that it requires sufficient time and area to make it work. To target sockeye and move off non-target chum, fishermen need time to travel to another area to fish. Chum do not concentrate in the same area or time of day; they are constantly moving. With compressed fishing time, it becomes harder for Area M

fishermen to voluntarily stand down during periods of high chum abundance. While sockeye salmon is the preferred catch in the commercial salmon fishery, if you do not give fishermen the time and area to avoid chum hotspots, fishermen will catch more chum. If fishermen are forced to fish fast due to excessive closures, they will catch a lot of chum while trying to catch sockeye. The fishermen are committed to responsible fisheries management, but they are also small business owners that need to feed their families. That is why the innovative and, most importantly, effective action plan developed in tandem with the 2023 regulations is the only real hope for reducing Area M chum salmon catch without decimating the families and communities that rely upon the Area M sockeye salmon fishery for survival.

The 2026 season has not changed this outlook. In fact, there were successful chum runs in the CWAK during 2026. One of the proponents, the Fairbanks Advisory Committee (FAC), admits that the Yukon and Kuskokwim summer chum showed “higher abundance” in 2026. It is not true that, as FAC asserts, AYK chum stocks were “struggling to even meet escapement goals with limited to NO harvest” in 2026. The Yukon and Kuskokwim both opened for summer chum subsistence fishing, and there were even commercial openings in the Kuskokwim. The Yukon summer chum run was well within the escapement goal range (as of mid-July, it was at approximately 940,000, with a goal of 500,000 to 1.2 million).¹ In Area M, summer chum met escapement goals and the total chum harvest was below the most recent 5- and 10-year averages.² The majority of the chum salmon caught in Area M in June is Asian chum. While FAC “assume[s] that only 25% of the [2026] Area M June chum salmon harvest were of Western Alaska origin,” they provide absolutely no support for that assumption. More importantly, on average, there is a 5% harvest rate on CWAK chum in the June Area M fishery, which includes stocks from Bristol Bay, Kuskokwim, Yukon summer, and Norton Sound river systems and every chum stream in-between along the 850-mile coastline.

¹ ADF&G, Inseason Alaska Commercial Salmon Summary: Arctic-Yukon-Kuskokwim (AYK) Region <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyfisherysalmon.bluesheetsummary> (last updated Sept. 18, 2026); ADF&G, 2026 Yukon River Salmon Summer Fishery Announcement #27 (Jul. 14, 2026), <https://www.adfg.alaska.gov/static/applications/DCFnewsrelease/1806850845.pdf>; ADF&G, Kuskokwim River Salmon Fishery Announcement #4 (Jul. 13, 2026), <https://www.adfg.alaska.gov/static/applications/DCFnewsrelease/1805601649.pdf>.

² ADF&G, Inseason Alaska Commercial Salmon Summary: South Peninsula <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyfisherysalmon.bluesheetsummary> (last updated Sept. 4, 2026).

Further, the connection between the Area M fishery and struggling chum stocks in the CWAK is unproven, as the ACR proponents admit. Climate change-related factors are known drivers of poor chum productivity in the Yukon. These factors include high water temperatures, increases in marine predators, toxicity due to the release of heavy metals from permafrost melt, and the spread of disease.³ Reducing fishing time in the Area M fishery will not address any of these factors. *See Sitka Tribe of Alaska v. Alaska Dep't of Fish & Game*, 540 P.3d 893, 897 (Alaska 2023) (ACR to close the commercial herring fishery after a record low subsistence harvest in the traditional area did not raise conservation concern where the Department found that the low harvest was primarily due to other factors, such as “the location of spawning shift[ing] away from typical areas”).

The modifications to Proposal 127 made through RC245 were not a reasonable compromise and do not further a conservation purpose. RC245 imposed changes to the proposal at the last minute that ignored the input of fishermen and communities directly affected, as well as the input of the ADF&G. It was the result of a successful smear campaign by wealthy sportfishing interests to pit subsistence fisheries in Western Alaska against commercial fisheries in the Aleutians. It is not based on sound science or any concept of how the June salmon fishery operates.

For example, the repeated description of chum as “bycatch” in the June Area M salmon fishery is completely inaccurate. Chum is not bycatch; all salmon, chum included, are allowable catch in the June fishery. Sockeye are the primary target for commercial fishing due to the higher commercial value of sockeye. But chum that are caught are still part of the fishery and are sold to fish buyers. Anti-trawling rhetoric cannot be wholesale imported into discussions about the Area M June salmon fishery, and the continued attempts to do so only show the complete lack of coherent knowledge about this fishery from outsider groups who repeatedly insist on regulating it.

The repeated demonization of “intercept” fisheries provides no basis at all for restricting Area M’s salmon fishery. All salmon fisheries in Alaska outside of the rivers and lagoons are intercept fisheries. There is no priority for in-river/terminal fisheries as opposed to ocean or “intercept” fisheries. That proponents so fervently hope and wish such to be true does not make it true. Proponents would need to amend the Alaska Constitution to establish such a priority.

³ Murdoch, A., et al. 2025 Multiple environmental drivers across life stages influence Yukon River Chinook salmon productivity. Canadian Technical Report of Fisheries and Aquatic Sciences 3717.

(B) Error in a regulation

ACRs 6 and 7 do not “correct an error in a regulation.” 5 AAC 39.999(a)(1)(B). These ACRs seek to reinstate Proposal 127, which was vacated by the Department of Law during its review of regulations to ensure that they comply with State law. *See* May 20, 2026 letter from Acting Att’y Gen. Mills to Lt. Gov. Dahlstrom (citing AS § 44.62.060(b)(1)).

ACRs are intended to correct errors “in a regulation” itself, not in the process for enacting regulations. Under AS § 44.62.060(b)(1), the Department of Law reviews and approves or disapproves regulations based on their “legality, constitutionality, and consistency with other regulations.” Because something about the adopted proposals or the process of their adoption rendered them illegal, unconstitutional or inconsistent with other regulations, *see* AS § 44.62.060(b)(1), the Department of Law stepped in to vacate the regulations. This does not automatically give rise to a situation remediable through the ACR process. The proponents do not point to any error in Proposal 127, nor could they since they are re-proposing adopted Proposal 127 verbatim.

The Department of Law vacating a regulation does not mean the regulation was erroneous. If the proponents have an issue with the vacating, the proper avenue to address that is an Administrative Procedure Act (APA) action against the Department of Law. This is not what the ACR process is meant to address. In any case, the proponents are incorrect that the Department of Law’s actions were illegal, invalid, or lacking explanation. The explanation was given in the May 20, 2026 letter: the Acting Attorney General issued a confidential Order of Corrective Action voiding five adopted proposals (126, 127, 141, 147, and 148) “under AS 39.52.430(c) and AS 39.52.330,” which is the Alaska Executive Branch Ethics Act. Under AS § 39.52.430(c), “[a]ny state action taken in violation of this chapter is voidable” Additionally, in situations where a hearing is not warranted, the attorney general “shall recommend action to correct or prevent a violation” of the Ethics Act. AS § 39.52.330. The Department of Law validly exercised this authority under AS §§ 39.52.430(c) and 39.52.330 by issuing an Order of Corrective Action that voided Proposal 127, amongst others.

The only conclusion to be drawn from the Acting Attorney General’s letter is that one or more Board members’ actions in voting to adopt Proposal 127 were in violation of the Ethics Act. Under AS § 39.52.340, the Department cannot disclose information about ethics investigations

without a waiver of confidentiality by the subject(s) of the complaint. If the Department of Law determines that the violation cannot be corrected under AS § 39.52.330 or if the subject of the complaint fails to comply with recommended corrective action, then the Attorney General is required to initiate formal, public proceedings. AS § 39.52.350(a). If the public wants to see the results of any Board member ethics investigations, it should be pressing the allegedly-conflicted Board members to voluntarily waive their confidentiality and disclose the information. The Board member(s)' unwillingness to waive confidentiality is the only reason that any ethics investigations have not been made public. Without that waiver, it would be unlawful for the Department of Law to say more than it already has.

(C) Unforeseen effect on a fishery

ACRs 6 and 7 raise no unforeseen effects that need correcting. 5 AAC 39.999(a)(1)(C). This criterion allows the Board to make changes when the effects of an adopted regulation turn out to be different than predicted. But because Proposal 127 was voided, it could not have any effects, whether foreseen or unforeseen. Additionally, the management plans in place for the Area M June salmon fishery are working as expected, as described above. And again, the ACR process is not meant to address concerns with how the Department of Law conducts its ethics investigations and exercises its authority to void regulations.

Again, proponents repeat demonstrably false information to inflame emotions. The Area M fishery is transparent. Post-season reports are prepared and shared with ADF&G and the public, and in-season data is provided to ADF&G daily. The fishery is responsive to in-season management but not based on escapement goals because of the thousands of ocean and river miles between Area M and the natal rivers. Instead, the fishery responds to the only data it has available during the fishing season: chum abundance and harvest. Proponents fail to provide any data or even a basic explanation of how the fishery “has not proven to be reactive to the prescribed ‘triggers,’” when the triggers have never been hit.

(D) Allocative

Even if any of the prior ACR criteria were met, these ACRs are predominantly allocative and thus should not be accepted. 5 AAC 39.999(a)(1)(D). ADF&G's comments indicated the original Proposal 127 was allocative and when the Board originally reviewed it at the February 2026 meeting, it went through the allocation criteria. *See* AS § 16.05.251(e). The fact that the

proponents point to low harvest in the AYK as the basis for imposing Proposal 127's restrictions on Area M fisheries shows it is an allocative proposal. The whole purpose of the proposal is to reduce the Area M June commercial salmon fishery to increase the harvest for other users. FAC expressly asserts that there should be "a more even allocation" of fisheries restrictions between Western Alaska and Area M fisheries. The regulations they cite further specify that "allocation" means "the granting of specific harvesting privileges . . . among or between various user groups," including "time periods, area restrictions . . . and other management measures providing or limiting harvest opportunity." 5 AAC 39.222(f)(1). Proposal 127 imposes time-period restrictions in a particular area, to limit harvest opportunity for a particular group: Area M seine and drift gillnet commercial fishers. It is allocative. Because neither proponent pointed to new information that would compel the Board to consider an allocative proposal, the Board should not accept this ACR.

2. ACR 8: Amend the *Post-June Salmon Management Plan for the South Alaska Peninsula to enforce king salmon caps with reductions in commercial salmon fishing time in the South Alaska Peninsula* (5 AAC 09.366) / By Fairbanks AC

This ACR, seeking to reinstate the voided Proposal 141 cannot be accepted under 5 AAC 39.999(a)(2) because it is "predominantly allocative in nature" and there is no compelling new information.

(A) Error in a regulation

See comments for ACRs 6 and 7, as the same reasoning applies (Proposal 141 was voided by the Acting Attorney General in May 2026 under AS §§ 39.52.330 and 39.52.430). ACR 8 seeks to reinstate Proposal 141 as adopted verbatim; it does not assert there was any error in the regulation. The ACR process is not a venue for complaints about the Department of Law's ethics investigations and actions. The proponent can file an Administrative Procedure Act case against the Department of Law to resolve those concerns.

(B) Unforeseen effect on a fishery

See comments for ACRs 6 and 7, as the same reasoning applies. Proposal 141 never went into effect and thus could not have had foreseen or unforeseen effects on the fishery. The proponent also does not provide any facts about the 2026 Post-June commercial salmon fishery, and certainly no unforeseen outcomes. The ACR process is not meant to address complaints about the Department of Law's ethics investigations and actions.

(C) Allocative

Even if any of the criteria were met, ACR 8 is predominantly allocative and thus should not be accepted. ADF&G's comments before the Feb. 2026 Alaska Peninsula meeting indicated the original Proposal 141 was allocative. The purpose of the proposal is to reduce the Area M Post-June commercial salmon fishery by imposing Chinook harvest triggers, to increase the possible harvest for other users. FAC asserts that Area M "needs restrictions . . . to deter the harvest of king salmon similar to the restrictions that exist in the Chignik area." This is clearly an allocation of "harvesting privileges" among commercial fishing users and between commercial and subsistence fishing users by imposing "area restrictions" and "quotas." 5 AAC 39.222(f)(1) (defining "allocation"). Because the proponent did not point to new information that would compel the Board to consider an allocative proposal, the Board should not accept this ACR.

3. ACR 9: Reduce maximum gillnet depth in the Alaska Peninsula Area to 70 meshes (5 AAC 09.331) / By Fairbanks AC

This ACR, seeking to reinstate the voided Proposal 147, does not meet any of the 5 AAC 39.999(a)(1) criteria, and cannot be accepted under 5 AAC 39.999(a)(2) because it is "predominantly allocative in nature" and there is no compelling new information.

(A) Fishery conservation purpose or reason

ACR 9 does not have a fishery conservation purpose. This proposal would reduce the allowed depth for set gillnets in Area M, but, as ADF&G told the Board in February 2026 when this proposal was first considered, "the Department does not have information on salmon migration patterns by depth in this area." There is no data to support the proponent's assertion that Chinook and chum catch will be reduced by reducing gillnet depth, while preserving the sockeye catch. Prior research on depth occupancy of maturing chum salmon commonly demonstrate vertical migration from 200 meters and 350 meters (~1,000 feet), far below either 90 or 70 mesh drift gillnet (a 90-mesh net with 4 ¾ inch mesh is approximately 35 feet in depth).⁴ This regulation has little payoff for chum salmon. More recent research emerging from satellite tagging of chums transiting the region in June shows that chum salmon spend the majority of their time at the surface and only occasionally and inconsistently make deep vertical dives. This suggests that shallowing nets is unlikely to achieve the conservation objective, as the modification would only affect a small portion of the water column where chum do not spend much time.

⁴ DeFilippo, L., et al. (2025). Drivers and Dynamics of Salmon Bycatch in the Eastern Bering Sea Pollock Fishery.

(B) Error in a regulation

See comments for ACRs 6 and 7, as the same reasoning applies (Proposal 147 was voided by the Acting Attorney General in May 2026 under AS §§ 39.52.330 and 39.52.430). ACR 9 seeks to reinstate Proposal 147 verbatim; it does not assert there was any error in the regulation. The ACR process is not a venue for complaints about the Department of Law's ethics investigations and actions. The proponent can file an Administrative Procedure Act case against the Department of Law to resolve those concerns.

(C) Unforeseen effect on a fishery

See comments for ACRs 6 and 7. Proposal 147 never went into effect and thus could not have foreseen or unforeseen effects on the fishery. The proponent also does not provide any facts about the 2026 Area M drift or set gillnet fisheries, and certainly no unforeseen outcomes from keeping the same gear regulations that have been in place for over 30 years. The ACR process is not meant to address complaints about the Department of Law's ethics investigations and actions.

(D) Allocative

Even if any of the criteria were met, ACR 9 is predominantly allocative and thus should not be accepted. ADF&G's comments before the Feb. 2026 Alaska Peninsula meeting indicated the original Proposal 147 was allocative. The purpose of the proposal is to restrict the commercial harvest for one set of users (drift and set gillnet fishermen in Area M), to increase the possible harvest for other users. Because the proponent did not point to new information that would compel the Board to consider an allocative proposal, the Board should not accept this ACR.

4. ACR 10: Amend Alaska Peninsula Area seine specifications to reduce net size (5 AAC 09.332) / By Fairbanks AC

This ACR, seeking to reinstate the voided Proposal 148, does not meet any of the 5 AAC 39.999(a)(1) criteria, and cannot be accepted under 5 AAC 39.999(a)(2) because it is "predominantly allocative in nature" and there is no compelling new information.

(A) Fishery conservation purpose or reason

ACR 10 does not have a fishery conservation purpose. As explained above in our comment on ACR 9, there is insufficient information on salmon migration patterns by depth in this area to determine that reducing seine net size will conserve Chinook and chum salmon, while allowing the harvest of sockeye. Additionally, regarding proponent's arguments about the impacts of Area

M seine fishing and total chum catch on chum runs in the AYK, *see* comments on ACRs 6 and 7. ACR 10 asserts that the June fishery averaged ~572,000 chum salmon harvested per season from 2020-2024, “which is among the highest five-year average in decades.” But this ignores the fact that included in that five-year period is an anomalous year (2021) where the Area M fleet harvested over 1 million chum. Notably, the 2021 fishery was not prosecuted under the current (2023) regulations and the adaptive management plan was not in effect. For context, the 2025 chum salmon harvest during the June fishery (South Unimak and Shumagin Islands) was 156,136.⁵ Regardless, the impacts of Area M fishing on CWAK stocks are not clear. Reducing purse seine size will not necessarily conserve more chum or increase AYK chum runs.

(B) Error in a regulation

See comments for ACRs 6 and 7, as the same reasoning applies (Proposal 148 was voided by the Acting Attorney General in May 2026 under AS §§ 39.52.330 and 39.52.430). ACR 10 seeks to reinstate Proposal 148 (RC208) verbatim; it does not assert there was any error in the regulation. The ACR process is not a venue for complaints about the Department of Law’s ethics investigations and actions. The proponent can file an Administrative Procedure Act case against the Department of Law to resolve those concerns.

(C) Unforeseen effect on a fishery

See comments for ACRs 6 and 7. Proposal 148 never went into effect and thus could not have foreseen or unforeseen effects on the fishery. Keeping the same gear regulations that have been in place for over 30 years did not lead to unforeseen outcomes. The ACR process is not meant to address complaints about the Department of Law’s ethics investigations and actions.

(D) Allocative

Even if any of the criteria were met, ACR 10 is predominantly allocative and thus should not be accepted. ADF&G’s comments before the Feb. 2026 Alaska Peninsula meeting indicated the original Proposal 148 was allocative. The purpose of the proposal is to restrict the commercial harvest for one set of users (seine fishermen in Area M), to increase the possible harvest for other users. The ACR specifically compares the Area M seine fishery with Chignik, Kodiak, Cook Inlet, and Prince William Sound and seeks to bring Area M “into line with” them, thus changing the

⁵ ADF&G, *2025 Alaska Peninsula and Aleutian Islands Salmon Season Summary* at p. 5 (Nov. 3. 2025), available at <https://www.adfg.alaska.gov/static/applications/dfnewsrelease/1744698737.pdf>

balance between those users. Because the proponent did not point to new information that would compel the Board to consider an allocative proposal, the Board should not accept this ACR.

5. ACR 11: Prohibit discard of Chinook salmon caught in purse seine gear in the Alaska Peninsula and Chignik areas (5 AAC 09.373 and 5 AAC 15.364) / By Fairbanks AC

This ACR, seeking to rescind a proposal (Proposal 135) just adopted in February 2026, does not meet any of the 5 AAC 39.999(a)(1) criteria.

(A) Fishery conservation purpose or reason

ACR 11 does not have a conservation purpose: it removes a common conservation tool. Prohibiting the retention of Chinook salmon 28 inches or greater in length enables live salmon to be returned to the water. While not all returned salmon will likely survive, non-retention conserves more salmon than requiring all caught salmon to be killed. Chinook 28 inches and greater have a higher survival rate when released from seine nets than smaller sized chinook.

Further, ACR 11 cites two regulations it seeks to change: 1) 5 AAC 09.373, prohibiting retention in Area M and 2) 5 AAC 015.364, prohibiting retention in Chignik. Yet, the proponent only seems to argue that there are conservation concerns in Area M, not Chignik. It is not clear why the same conservation tool would cause issues in one area, but not another.

Additionally, while it is worthwhile to give even a small number of Chinook a chance to complete their journey and contribute to the next generation, the reality is that not many Chinook caught in Area M are likely destined for Alaskan Rivers. ACR 11 suggests that, according to a 2015 ADF&G study, the majority of Chinook caught in Area M originate in Coastal Western Alaska. But in ADF&G's comments to the Board on Proposal 135 before the February 2026 Alaska Peninsula meeting, the Department cited more recent data from 2024 on the Gulf of Alaska, which indicates almost 80% of Chinook in the Gulf come from British Columbia or the West Coast of the United States. We agree that Chinook stocks are imperiled throughout Alaska, which is precisely why it is important to return live Chinook to the water and allow as many Chinook to live as possible.

(B) Error in a regulation

ACR 11 does not assert there was any error in the regulations it seeks to rescind (Proposal 135 (RC208), codified at 5 AAC 09.373 and 5 AAC 15.364), and there was no error.

(C) Unforeseen effect on a fishery

ACR 11 does not assert there were any unforeseen effects on a fishery due to the adoption of Proposal 135, and there were none.

(D) Allocative

ACR 11 is not allocative, as it only removes a conservation tool that is common throughout the State.

6. ACR 13: Establish a statewide Chinook salmon retention and disposition reporting standard for commercial salmon fisheries (5 AAC 39.130) / By BSFA

This ACR, seeking to adopt a statewide regulation to require full retention of all Chinook regardless of size in commercial fisheries – purse seine, drift gillnet, setnet, and troll (5 AAC 39.130), does not meet any of the 5 AAC 39.999(a)(1) criteria. Most importantly, 5 AAC 39.130 is not within the Board’s purview, but rather rests within the Commissioner’s express statutory authority under AS §§ 16.05.050(a)(4) (power to collect, classify, and disseminate statistics, data and information) and (a)(11) (power to initiate or conduct research necessary or advisable)

(A) Fishery conservation purpose or reason

ACR 13 claims to have a conservation purpose but does not demonstrate that supposition. In fact, full retention would yield quite the opposite conservation result compared to the current regulations that provide for non-retention in proscribed fisheries (of which southeast Alaska troll and Kodiak seine are just two examples). This change would result in killing every Chinook caught in commercial fisheries under 28 inches—fish which are currently released and therefore have a chance to return to their natal stream. This ACR is the antithesis of conservation and responsible fishery management. A statewide regulation for retaining (and thus killing) all Chinook caught will only hamstring ADF&G’s effort to implement regulations designed to address stocks of concern. ACR 13’s proponent states that killing all commercially-caught Chinook would be justified by obtaining more complete stock composition data. This sounds very much aligned with a sportfishing perspective, and does not evince a serious concern for conservation of stressed or healthy Chinook stocks.

The Commissioner’s statutory authority to initiate further research and collect data is already being used to conduct research under the current regulations. For example, ADF&G implemented a 3-year full-retention Chinook study with funding for 2025-2027 to assess stock composition, size, age, and origin in the seine fishery. In addition, the Board’s and ADF&G’s

locally prescribed management actions have been effective at recovering several southeast Alaska stocks from stock-of-concern status in recent years, with Chilkat, Chickamin, and Unuk Rivers stocks all delisted in 2024 and the Taku River south of Juneau likely to be delisted during its next Board cycle. The Board and Department already have the tools necessary to study and conserve Chinook stocks.

(B) Error in a regulation

ACR 13 does not assert there was an error in regulation, but rather the proponent presents a grievance with a new regulation requiring full retention for the Nushagak fishery (5 AAC 06.391(g)) adopted by the Board in 2026. It seems plain that if it were not for the Board's action at the 2026 Bristol Bay meeting, there would be no ACR 13. The Board had its reasons for adopting that regulation regarding conservation of Nushagak Chinook. If there is need for a remedy, logically it should be heard at the 2029 Bristol Bay meeting.

(C) Unforeseen effect on a fishery

ACR 13 asserts that the Board's action at the 2026 Bristol Bay meeting regarding the Nushagak fishery requirement for Chinook full retention did not consider the implications for personal use, including a permit holder's ability to designate a portion of their catch for personal subsistence use. Personal-use language is in the regulation; therefore, this concern cannot be considered unforeseen. The real consideration here is why ACR 13 is being proposed for a statewide regulation when the Board's adoption of the Nushagak requirement in January 2026 is clearly what is so upsetting to the author of this ACR.

(D) Allocative

ACR 13 is allocative. For example, in southeast Alaska, purse seiners release Chinook which can then be caught by other user groups. Full retention of Chinook would remove fish that could otherwise be caught by trollers, set net, drift gillnet or sport fishermen. Additionally, some of the non-retained Chinook would return to their natal streams.

* * *

The commercial fisheries of Area M support communities and families on the Alaska Peninsula, including the Native tribes of Belkofski, Unga, Agdaagux, Pauloff Harbor, Qagan Tayagungin, and False Pass, that have fished these waters for ten thousand years. Many of the region's 3,600 inhabitants rely on commercial harvests to provide for their families, often by

sharing a portion of their harvest. Like Interior communities, salmon harvest is distributed widely and has deep historical roots. These communities are struggling due the closure of Peter Pan Seafoods and declining fish prices which affects processing jobs and raw fish taxes vital to public education, infrastructure, and local governments. These ACRs are yet another attempt to pit Area M commercial fishermen against Alaska Interior subsistence fishermen by creating false narratives about the Area M commercial fishery. For the foregoing reasons, these ACRs should be rejected by the Board.

Name: Kiley Thompson
Area M Seiners Association Organization

Community of Residence: Sand Point

Please see attached Area M June Fishery Report

South Peninsula Adaptive Fleet Management Program June 2026 Post-Season Report

Key Takeaways

- Fourth largest sockeye harvest since 2001, and the largest volume of sockeye since the triggers and the program were formally adopted at the Board of Fisheries in 2023.
- The Seine fleet implemented 561.86 hours of area-specific closures and 40.98 hours of mandatory fleet-wide (entire South Peninsula) closures above and beyond what is required in regulation, for a total of 643.82 hours across the Shumagins and South Unimak.
- The estimated foregone fishing time for an individual fisherman assumed to remain in a single area, was roughly 147.77 hours in the Shumagins and 121.62 hours in South Unimak. Respectively, that is a 48% and 39% loss of fishing relative to the 310 hours of available fishing time in regulation.
- The fleet implemented a total of 86 closure events (up from 35 in 2025); 3 were fleet-wide and the rest area-specific in the Shumagin Islands (n = 44) and South Unimak (n = 39).
- The Concerned Area M Drifters (CAMF) had 37 vessels participate in individual voluntary standdowns, an average of 47 hours per vessel, plus cooperatively standing down with seine fleet toward the end of the 2nd and 3rd periods to avoid exceeding triggers.
- The preliminary ADF&G reported total June harvest of chum salmon is 486,183 and sockeye salmon is 1,893,811 across all gear types and areas. The data portal estimated roughly 316,852 chum salmon (65% of total harvest) were harvested by the seine fleet.
- Sockeye harvest was a **338% YOY increase from 2025**, but chum harvest was only 211% YOY increase from 2025 demonstrating the fleet was able to strategically harvest the high volume of sockeye in a large mixed run, keeping chum harvest relatively low despite high chum presence.

Summary of 2026 Results

The fleet held a pre-season meeting to elect fishermen board members and review the program. A few changes were made based on feedback from fishermen and lessons learned from previous years. After discussion with ADF&G staff, the fleet agreed to only test fish in the Shumagin Islands. Results from the South Unimak test fishery in prior years proved less useful for management decisions, and were cost-prohibitive to execute. Prior test fishing also showed that run timing is variable each year, and arbitrarily closing the 10th was not as effective as having the additional fishing day for more flexibility. This year marked the first season with strong sockeye volume since the formal adoption of the AMP in 2023, truly testing the feasibility of the program. The fishermen board met multiple times every day to assess on-the-ground harvest estimates in each area, and primarily relied on mandatory area-closures to manage the spatial variability in harvest. However, given the high volume there was concern triggers would be met, so the board did make three fleet-wide closures for the entire South Peninsula to avoid exceeding the triggers. Several vessels came close to receiving penalties but did not exceed the performance standards, so warning notices were issued.

Ultimately none of the triggers were exceeded, but there were several notable challenges. Typically, the drift fleet will spend the first two weeks fishing in the South Peninsula after which the majority will shift to the North Peninsula. This year, the North Peninsula runs were slow to

meet escapement goals and the drift fleet opted to stay in the South Peninsula until late June which added additional pressure to harvest. Currently, regulations stipulate that all chum harvest in the South Peninsula accrues toward chum triggers, but only the seine fleet is subject to trigger closures. This created an imbalance in harvest and accountability, whereby the seine fleet had to be overly conservative to account for unrestricted drift harvest.

The core underlying issue is that static triggers do not work for runs that are highly variable from year to year, and need to be adaptive to sustain this program. During years of high abundance, a too-low trigger acts as a constraint similar to rigid time/area closures, resulting in an unintended “race for fish” and reducing the fleets’ ability to adapt. A good example of this was in 2022. This was a large volume year and the first year fishermen began implementing adaptive management, but before the new triggers and stricter time/area regulations were passed in 2023. ADF&G reported 3.9 million sockeye harvested and an overall chum to sockeye ratio of 12%, one of the lowest on record. While the short-term goal of this program is reducing chum harvest, the long-term goal is to provide a flexible and sustainable framework that incentivizes conservation-minded fishing behavior while supporting a healthy salmon fishery.

Concerned Area M Fishermen (CAMF) Drift Participation

A subset of the CAMF fleet volunteered to log their stand downs on an individual vessel basis, as a continuation of the pilot program started in 2025. Participating vessels submitted their standdowns through an online form, including the same information logged by seiners, which was summarized post-season by the portal manager. Results showed 37 unique vessels (of the 97 permitted) participated, an increase from 28 vessels in 2025. These vessels logged a total of 1741.22 hours of foregone fishing time, an average of 47 hours per vessel relative to the 352 hours of available regulatory fishing time. Of those hours, 1236 hours were due to avoiding chum, 66 hours were due to religious holidays, 96 hours were due to weather conditions, 36 hours were due to travel time, 129 hours were due to mechanical, and 177 hours were categorized as “Other.”

Because the drift fleet does not operate under the adaptive management plan, these hours are a collection of individual vessels and not fleet-wide mandatory closures so this total is not intended as a comparison to foregone fishing relative to regulatory fishing time. Categorizing stand down time in this way is new and not done for the seiners, but it is important to note that all gear types experience loss of fishing time beyond regulatory closures and chum avoidance which is often unaccounted for. Additionally, the entire CAMF fleet agreed to stand down with seiners toward the end of each period to avoid exceeding triggers. Preliminary data show the drift fleet harvested 176,698 chum accounting for roughly 36% of total June chum harvest.

Management Results

- There was 100% participation from the seine fleet for a total of 40 vessels (down from 42 in 2025) with signed agreements, 7 of which were Board members throughout the season.
- The fleet implemented a total of 86 closure events (up from 35 in 2025). Three events were fleet-wide closures for the entire South Peninsula, and the rest were area-specific closures in the Shumagin Islands (n = 44) and South Unimak (n = 39). Given the high volume, all closures were mandatory.

- ADF&G staff announced the Shumagin Islands Section would close early during the 2nd period due to Chignik sockeye not meeting lower bound escapement goals, but escapement goals were met before the early closure took effect, so staff lifted the closure and no fishing time was lost.
- Each closure/stand down ranged in duration from 1 hour to 24 hours and occurred at various times throughout each period.
- The Shumagin Islands section had a total of 320 hours of area-specific closures across all areas, with an average of 106.77 hours per fishing area.
- South Unimak had a total of 241.88 hours of area-specific closures, with an average of 80.62 hours per fishing area.
- In addition to area-specific closures, there were 3 fleet-wide (entire South Peninsula) closures totaling 41 hours.

The results of this program can be difficult to interpret. Given how it is managed adaptively on an area-by-area basis for small groups of fishermen in those areas, closure hours are not easily comparable to regulatory fishing hours for the entire South Peninsula. However, if we assume fishermen remain in an area the entire season (which many do), we can estimate foregone fishing time for an individual fisherman by adding the average per-area closure hours with the area-wide closure areas. For an individual fisherman that equates to roughly 147.77 hours (48%) in the Shumagins and 121.62 hours (39%) in South Unimak, of foregone fishing relative to available regulatory fishing time (310 hours).

Harvest Results

- ADF&G reported a total June harvest of 486,183 chum salmon and 1,893,811 sockeye salmon across all gear types, and the data portal estimated roughly 316,852 chum salmon (65% of total harvest) were harvested by the seine fleet.
- 2026 harvest of chum was 3.7% below the 5-year average, 3.7% below the 10-year average, 10.8% above the 20-year average, and a 211% YOY increase from 2025.
- 2026 harvest of sockeye was 3.4% below the 5-year average, 27.6% above the 10-year average and 38% above the 20-year average, and is a **338.2% YOY increase from 2025**. This marks the 4th largest sockeye harvest since 2001.

APPENDIX A: Adaptive Management Plan Overview

Fishermen Board Management

The fishermen board's ("Board") purpose was to manage overall fleet harvest to optimize sockeye harvest and allow chum to pass through the fishing grounds. Board members are re-elected every year to ensure fair representation among all fleets delivering to various processors and spatial distribution, with board members serving as conduits for updates from the fishing grounds. The Board typically met at least twice per day; in the evening to discuss a tentative fishing schedule for the following day and again in the morning to confirm the schedule after preliminary harvest data was uploaded to the portal for the previous day. The Board would then deliberate whether fleet-wide closures or more spatially targeted closures were necessary, using a combination of preliminary harvest data, number of vessels and fish tickets contributing to data, updates from fishing grounds, and harvest trends by non-seine gear. Once a closure was finalized, a Board member would log it into the portal and a notification email was sent to the entire fleet.

Individual Vessel Accountability

The management agreement stipulated a secondary level of accountability for individual vessels. Vessel captains were provided with a login for the data portal, which displays their vessel report card. Report cards list each fish ticket by landing date and calculates their variance of chum harvest and ratio from the fleet average on a daily and period basis. In effect, individual vessels could see whether they were within the fleet average or an outlier in terms of chum harvest. Fishermen worked to stay within certain targets, but were only assessed at the end of each period. This allowed them to maintain some autonomy to decide when and where to fish daily based on their performance relative to the fleet, provided fishing was open.

Processor Involvement

As in the prior season, the seine fleet collectively requested that their respective processors mandate 100% participation from the fleet in order to have a market in June. This was accomplished via signed management agreements with the processors serving as the enforcing party in the agreement. The Board consulted with processors to develop a tender sampling design with minimum requirements, although for larger deliveries processors often opted for more robust sampling. When possible, average weights were calculated from samples and extrapolated to the delivery using internal worksheets. These data were transmitted to the plant, where plant staff develop preliminary harvest reports that are submitted to the ADFG Area Management Biologists for inseason reporting and to the data portal each morning.

Portal Management

The Portal Manager ("PM") was responsible for QA/QC of portal data. Every morning the PM would verify all processors submitted their preliminary data and manually input the total harvest for all gear types in the South Peninsula and review preliminary data for any potential data entry errors. The portal software was also adjusted regularly based on fishermen feedback. Inseason harvest data is regularly updated throughout and after the season as deliveries are processed at the shoreside plant. Data for this report is preliminary and harvest numbers are based on the ADF&G daily harvest summary as of June 29th, 2026. Final numbers are published in the ADF&G Annual Management Report, and future reports reflect those adjustments.

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS

Thaddeus Tikiun Jr., Chairperson | Vivian Korthuis, CEO | AVCP.org



Advocacy

101 A Main St., PO Box 219, Bethel, AK 99559 | T 907.543.7300

October 8, 2026

To Whom It May Concern:

The Association of Village Council Presidents (AVCP) is a regional Tribal nonprofit organization serving 56 federally recognized Tribal governments located within 48 communities throughout the Yukon-Kuskokwim Delta of western Alaska. AVCP's member Tribes are located across more than 75,000 square miles of extreme remote Alaska, a region approximately the size of New York State and one of the most geographically isolated areas in the United States. Most communities are not connected by roads and rely on air, river, and seasonal transportation networks to access essential goods and services. In this region, the lands, waters, fish, wildlife, and other natural resources are not simply environmental assets; they are the foundation of food security, cultural continuity, community well-being, and our traditional Ways of Life. For generations, our people have depended upon subsistence resources to sustain their families, communities, and cultures. AVCP works on behalf of its member Tribes to protect these resources, uphold Tribal sovereignty, and advance Tribal self-determination through advocacy, program administration, and government-to-government engagement.

Western Alaska subsistence users have carried substantial conservation burdens during years of severely diminished salmon returns. At the same time, Alaska Department of Fish and Game genetic studies confirm that Central Western Alaska (CWAK) chum salmon are harvested in the South Alaska Peninsula June fishery. ADF&G estimated that CWAK chum represented 17.7% of the June chum harvest in 2022, approximately 96,116 fish, and 28.4% in 2023, approximately 58,497 fish.

AVCP therefore continues to support reasonable conservation measures that reduce interception of Western Alaska salmon and more equitably share the burden of conservation. AVCP also remains concerned that several conservation measures adopted by the Board through its public process in February 2026 were subsequently vacated. Agenda Change Requests (ACRs) 6, 7, 8, and 10 seek, in whole or in part, to restore measures considered and adopted during that Board process. AVCP submits these comments in response to ADF&G's October Board of Fisheries work session written comment period request.

AVCP supports ACRs 6 and 7, consistent with AVCP's previous testimony before the Board of Fisheries and its longstanding advocacy for the conservation of Western Alaska chum

Nunaput umyuallgutkut pinirluteng-llu, Tegganerput qigcikluki pirpakluki-llu, ayagyuaput-llu ciuliqagcimaut yuuyarakun. Our Tribes are united and strong, our Elders are respected and valued, and our youth are guided by Yuuyaraq.

Akiachak, Akiak, Alakanuk, Andreafski, Aniak, Atmautluak, Bethel, Bill Moore's Sl., Chefornak, Chevak, Chuathbaluk, Chuloonawick, Crooked Creek, Eek, Emmonak, Georgetown, Goodnews Bay, Hamilton, Hooper Bay, Lower Kalskag, Upper Kalskag, Kasigluk, Kipnuk, Kongiganak, Kotlik, Kwethluk, Kwigillingok, Lime Village, Marshall, Mekoryuk, Mtn. Village, Napaimute, Napakiak, Napaskiak, Newtok, Nightmute, Nunakauyak, Nunam Iqua, Nunapitchuk, Ohogamiut, Oscarville, Paimiut, Pilot Station, Pitka's Point, Platinum, Quinhagak, Red Devil, Russian Mission, Scammon Bay, Sleetmute, St. Mary's, Stony River, Tulaksak, Tuntutuliak, Tununak, Umkumiut

salmon. These ACRs seek to reinstate the Area M June fishing restrictions adopted by the Board under **Proposal 127** in February 2026 and subsequently vacated. The measures would limit purse seine and drift gillnet fishing beginning June 10 to no more than three days in a seven-day period and no more than 24 hours in a day. ADF&G recognizes the South Alaska Peninsula June fishery as a mixed-stock fishery harvesting local and non-local salmon and has documented Central Western Alaska chum in that fishery. AVCP continues to support the conservation intent behind the previously adopted regulation and supports reinstating measures intended to reduce interception and provide additional protection for Western Alaska chum.

AVCP also **supports ACR 10**, which seeks to reinstate seine gear restrictions considered and adopted by the Board under **Proposal 148** in February 2026 and subsequently vacated. ACR 10 would reduce allowable purse seine depth from 375 meshes to 325 meshes, reduce maximum lead length from 150 to 100 fathoms, and limit the aggregate length of seine and lead to 250 fathoms. AVCP supports reasonable gear restrictions intended to reduce interception of Western Alaska salmon and ensure that conservation responsibility is not borne disproportionately by Western Alaska subsistence users. Reconsideration of the previously adopted measure also provides the Board an opportunity to restore a conservation action reached through its public regulatory process.

For the Tribes AVCP represents, the discussion surrounding bycatch is not an abstract fisheries management issue. It is about the continued ability of our communities to harvest and share the foods that have sustained our people for generations. Transparent and accessible public processes help build trust, strengthens accountability, and promotes informed participation in decision-making processes that directly affect our subsistence Ways of Life.

Thank you for the opportunity to comment on this proposed information collection. AVCP looks forward to continued engagement with the Board of Fisheries on issues affecting the people, Tribes, and communities of the Yukon-Kuskokwim Delta.

If you have any questions regarding these comments, please contact AVCP's advocacy team at advocacy@avcp.org.

Sincerely,

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS



Vivian Korthuis
Chief Executive Officer

Name: Riley Boss

Myself

Community of Residence: Ketchikan

Greetings to the Alaska Board of Fish,

My name is Riley Boss and have been a resident of Ketchikan, AK since 2020. I am writing to express my support for ACR 5 to allow for further discussion on European Green Crab regulations during this Board Cycle.

I was born and raised in New Hampshire where European Green Crab have existed and created several persistent ecological problems for my community. During my time at the University of New Hampshire I was a teaching assistant for an Introduction to Biology class that focused around marine sciences in our region. One of our focuses in this class was to study European Green Crab in Rye, New Hampshire. Faculty at the University of New Hampshire, New Hampshire Sea Grant, and the Seacoast Science Center taught our students on what damage had been done along our coasts over the years and I cannot express how devastating they have been. Outcompeting native crab species, destruction of habitat, among other things, it was disheartening to see what had been done.

I have been watching the invasion of European Green Crab in Alaska through the work that my husband does through the Tribe and his academic team he coaches at the high school. The Alaska marine ecosystem and the shellfish industry are in real trouble in the near future if something isn't done to mitigate the impacts of this new invasion. I have been out on the beach this summer with my husbands team and we are seeing an explosion in population in Ketchikan. Last year we had found only 5 individual green crab, this year so far his team has harvested over 1,800. I've also joined him and his family on boating trips around Cordova Bay in western Prince of Wales where we have found evidence of green crab in areas previously unknown. We recently found out that green crab have been found just a handful of miles away from his home community of Hydaburg, where so much his family relies on harvested shellfish in that area.

Green crab have done a lot of harm in my home state and unless something is done here in Alaska, we will see the same results as they did. Alaska has the advantage however, as we are just starting this invasion whereas the east coast didn't really understand the impact of green crab until well after they were introduced. Over 200 years since the introduction of green crab on the east coast and we still have huge impacts on our shellfish industry, including our lobsters. But the time to act is now. This issue cannot wait another 2 years before it is even discussed. The State of Alaska must work with anyone who is able to, to address this issue including the Tribes, universities, the commercial shellfisheries harvesters, etc. This is something that is going to impact all of us.

I think adopting ACR 5 for further discussion is a good place to start. We need to have a meaningful discussion at the Board level so that we can come up with proactive management strategies that work for Alaskans. I don't know what needs to be done exactly, but I know there

are very knowledgeable people out there that can work with the Board and the Department to make that happen NOW.

With urgency,

Riley V. Boss



Central Council of the Tlingit & Haida Indian Tribes of Alaska

October 9, 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: Tlingit & Haida Comments on Agenda Change Request 5 – European Green Crab Classification and Emergency Response

Dear Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries:

The Central Council of the Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) submits these comments in support of the Board accepting **Agenda Change Request 5 (ACR 5)** for expedited consideration. ACR 5 proposes reclassifying European green crab (*Carcinus maenas*) from a Class A to a Class B banned invasive species under 5 AAC 41.075 to address regulatory barriers that may limit community participation in removal efforts.

At its Ninety-First Annual Tribal Assembly, held September 23–25, 2026, Tlingit & Haida adopted **Resolution TA 26-34, Emergency Declaration for the Invasive European Green Crab Threat in Southeast Alaska**, formally declaring a state of emergency in response to the growing invasion. Through this resolution, the Tribal Assembly affirmed the urgent need to protect Southeast Alaska's marine ecosystems, traditional food resources, and fisheries, and committed the Tribe to pursuing partnerships, funding, education, outreach, and other measures to combat the invasion. The resolution also calls upon the Alaska Board of Fisheries and Alaska Department of Fish & Game (ADF&G) to take meaningful action to study and mitigate the impacts of European green crab.

The rapid expansion of European green crab presents a significant threat to Southeast Alaska's marine ecosystems, fisheries, customary and traditional food resources, and coastal communities. Since the first confirmed detection on Annette Island in 2022, European green crab have been documented in Ketchikan and near Hydaburg, Kasaan, Saxman, and southern Etolin Island near Wrangell. The Metlakatla Indian Community has removed tens of thousands of crabs, and Tribal and community partners have undertaken substantial monitoring and removal efforts in other affected areas.

These detections demonstrate that the invasion is no longer isolated to a single location. With warming sea temperatures and ocean currents potentially facilitating the northward movement of crab larvae, additional Southeast Alaska communities and marine habitats remain at risk. Waiting until the regular Southeast shellfish regulatory cycle in 2028 could result in lost opportunities for early detection, targeted suppression, and prevention of further establishment.

European green crab prey on shellfish, compete with native species, and disturb eelgrass and nearshore habitats that support juvenile salmon, Dungeness crab, and other marine resources. These impacts extend beyond ecological and economic concerns. Healthy estuaries, salmon, crab, clams, abalone, and other marine resources are integral to Indigenous food systems, cultural practices, intergenerational knowledge, and the continued exercise of Tribal stewardship responsibilities.

Protecting these resources is directly connected to safeguarding Tribal food security, customary and traditional use, and the ecological relationships upon which our communities depend.

Reclassification Should Reduce Barriers While Maintaining a Coordinated Response

Tlingit & Haida recognizes the practical concerns underlying ACR 5. Under the current Class A designation, individuals generally must obtain authorization to trap and retain European green crab, while those encountering suspected crabs are directed to document and report their observations. Although these requirements serve important conservation and identification purposes, they can also limit timely removal across Alaska's extensive and sparsely populated coastline.

Reclassification may provide an additional tool for community participation and removal. However, Tlingit & Haida believes any regulatory changes must be carefully structured to support effective suppression without creating unintended consequences. Expanding removal opportunities should not replace a coordinated early detection and rapid response program. A successful approach must combine targeted trapping, reliable reporting, public education, scientific monitoring, and appropriate safeguards against misidentification and unintended transport.

Accordingly, Tlingit & Haida encourages the Board, in coordination with ADF&G and affected Tribal governments, to ensure that any proposed regulatory changes establish clear identification, handling, reporting, transport, and disposal protocols before substantially expanding public removal activities.

Maintaining reliable reporting is particularly important. Community participation should strengthen Alaska's surveillance network and improve the State's understanding of where European green crab are becoming established. Removal efforts should also prioritize ecologically and culturally important habitats, including eelgrass beds, salmon nursery areas, and shellfish gathering areas.



Tlingit & Haida further encourages caution against allowing reclassification to prematurely establish a conventional fishery or commercial market for European green crab without adequate scientific and regulatory review. The primary objective must remain suppression and, where feasible, eradication rather than creating economic incentives that could complicate long-term invasive species management.

Tribal Governments Must Be Partners in the Response

Tribal governments and community organizations have already demonstrated leadership in responding to the European green crab invasion. The Metlakatla Indian Community's extensive trapping and monitoring efforts, along with work undertaken by the Ketchikan Indian Community and other regional partners, demonstrate the importance of locally driven detection and suppression.

The State should build upon this existing capacity rather than relying disproportionately on Tribal governments, community organizations, and volunteers to absorb the costs of protecting resources important to all Alaskans.

Tlingit & Haida urges ADF&G, the Alaska Legislature, and federal partners to identify and establish direct, sustained funding opportunities for Tribal governments and other organizations conducting early detection, scientific monitoring, trapping, education, and suppression activities. This should include resources for equipment, training, staffing, standardized monitoring protocols, and community outreach.

Additional investment in statewide invasive species coordination and response capacity is also needed to ensure that communities have access to timely technical assistance and support as new detections occur.

Consistent with Tribal Assembly Resolution TA 26-34, Tlingit & Haida also encourages a coordinated regional response involving Tribal governments, local municipalities, federal agencies, the University of Alaska, and other research and conservation partners. Meaningful government-to-government consultation and direct Tribal participation in planning, decision-making, and implementation will be essential to developing effective and sustainable response strategies.

Scientific Research and Long-Term Monitoring Are Essential

Beyond immediate removal efforts, Tlingit & Haida believes additional scientific research is necessary to better understand the ecological, cultural, and economic consequences of the European green crab invasion.

The State should prioritize research examining impacts on native shellfish, juvenile salmon, Dungeness crab, eelgrass habitat, and other marine resources important to customary and traditional food gathering.

Coordinated monitoring, including emerging detection technologies such as environmental DNA (eDNA), should also be explored to strengthen early detection capabilities and identify areas at greatest risk of establishment.



Scientific findings should inform management priorities, guide targeted suppression, and support adaptive strategies as the invasion develops.

Recommendations

Tlingit & Haida respectfully requests the Board accept ACR 5 for expedited consideration in recognition of the conservation urgency presented by the European green crab invasion. Acceptance would provide an opportunity to evaluate regulatory approaches that reduce unnecessary barriers to removal while maintaining appropriate safeguards.

Consistent with Tribal Assembly Resolution TA 26-34, Tlingit & Haida further recommends that the Board, ADF&G, and appropriate State and federal partners:

1. **Advance timely regulatory consideration.** Accept ACR 5 for consideration before the 2028 Southeast shellfish regulatory cycle and evaluate approaches that support effective removal and suppression while protecting native species and marine habitats.
2. **Maintain safeguards and reporting requirements.** Ensure any proposed regulatory changes include appropriate identification, handling, reporting, transport, and disposal protocols to prevent misidentification, unintended spread, and loss of critical monitoring information.
3. **Expand monitoring, scientific research, and targeted suppression.** Prioritize early detection, ecological impact assessments, and coordinated removal in vulnerable habitats, particularly those important to customary and traditional food gathering.
4. **Provide dedicated funding and resources.** Encourage ADF&G, the Alaska Legislature, and federal partners to establish sustained funding, technical assistance, and streamlined authorization processes for Tribal governments and community partners conducting monitoring, research, education, and suppression activities.
5. **Strengthen government-to-government consultation and regional coordination.** Engage directly with affected Tribal governments and establish partnerships among Tribes, municipalities, federal agencies, universities, and other organizations to develop and implement a coordinated regional response.
6. **Recognize and respond to the declared emergency.** Acknowledge Tlingit & Haida's emergency declaration under TA Resolution 26-34 and work collaboratively with the Tribe and other affected governments to identify immediate and long-term actions necessary to protect Southeast Alaska's marine ecosystems, fisheries, and traditional food resources.

Closing

The choice before the Board should not be limited to maintaining existing regulatory barriers or creating unrestricted removal opportunities that may carry unintended consequences for native species and fisheries. Alaska has an opportunity to pursue a more comprehensive approach that combines timely regulatory action with scientific research, targeted suppression, reliable reporting, public education, adequate funding, and meaningful Tribal partnerships.



Tlingit & Haida recognizes that ACR 5 represents only one component of the broader emergency response needed to address European green crab in Southeast Alaska. Nevertheless, timely consideration of the proposal is an important opportunity to advance coordinated action while populations remain relatively geographically constrained. The longer Alaska waits to respond, the greater the potential ecological, cultural, and economic consequences for Southeast Alaska's communities. Proactive, coordinated action now will be substantially more effective and less costly than responding after the invasion becomes more widespread and difficult to control.

Tlingit & Haida stands ready to work with the Board, ADF&G, Tribal governments, and other partners to protect our shared marine resources and uphold our responsibility to future generations.

Gunalchéesh, Háw'aa (Thank You) for your consideration.

Sincerely,



Chalyee Eesh, Richard J. Peterson,
Tlingit & Haida President

Attachment: Tribal Assembly Resolution TA 26-34 – Emergency Declaration for the Invasive European Green Crab Threat in Southeast Alaska



CENTRAL COUNCIL OF THE TLINGIT & HAIDA INDIAN TRIBES OF ALASKA
Ninety-First Annual Tribal Assembly
September 23-25, 2026
Juneau, AK

Resolution TA 26-34

Title: Emergency Declaration for the Invasive European Green Crab Threat in Southeast Alaska

By: Ketchikan Tlingit & Haida Community Council

WHEREAS, the Central Council of Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) is a federally recognized tribe with more than 38,000 citizens; and

WHEREAS, Tlingit & Haida embodies the Tribal Value of Stewardship of our lands and waters such that the natural and cultural resources in Southeast Alaska remain sustainable for future generations; and

WHEREAS, Many of these resources, including but not limited to, clams, dungeness crab, abalone, salmon, and more, are under threat from the invasion of European Green Crab (*Carcinus maenas*) in Southeast Alaska; and

WHEREAS, European Green Crab have the capability to outcompete native species of crab for space and resources and to significantly damage critical eel grass nurseries that many species utilize at various life stages; and

WHEREAS, European Green Crab are widely known around the world as one of the most effective invasive species as they are classified by the International Union for the Conservation of Nature (IUCN) as one of the “Top 100 Worst Invasive Species” on the planet; and



WHEREAS, the first European Green Crab detected in Alaska was on July 19th, 2022 on Annette Island where to this day the Metlakatla Indian Community has captured more than 77,000 crab; and

WHEREAS, European Green Crab have since been detected in Ketchikan in late 2025, and in 2026 with the combined efforts from the Ketchikan Indian Community, Sealaska, the University of Alaska Southeast, and a local youth program, over 5,000 crab have been captured on Revillagigado Island; and

WHEREAS, confirmed detections of European Green Crab have also been found near the communities of Hydaburg, Kasaan, Saxman, and the southern end of Etolin Island near Wrangell; and

WHEREAS, European Green Crab have been partially or completely responsible for the collapse of several commercial shellfish fisheries around the United States, most notably decimating the soft-shell clam industry by 75% on the east coast of the United States; and

WHEREAS, many traditional and commercial shellfish fisheries in Alaska are already under duress from impacts from sea otters, climate change, and the mismanagement from the state of Alaska, so adding the impacts that European Green Crab will have will result in devastating implications on these resources; and

WHEREAS, European Green Crab are currently only known to occupy the waters of southern Southeast Alaska, but as sea surface temperatures continue to climb and ocean currents push crab larvae further north, more communities in our region will be detecting these invasive crab in the coming years;

NOW THEREFORE BE IT RESOLVED, that the Ninety-First Tribal Assembly of the Central Council of the Tlingit & Haida Indian Tribes of Alaska delegation convened September 23-25, 2026, hereby declares a state of emergency as a result of the European Green Crab invasion in Southeast Alaska and will pursue any viable opportunities to aid in combating this invasion through grant acquisition, partnership building, education & outreach, and more;

BE IT FINALLY RESOLVED, that Tlingit & Haida calls upon the State of Alaska, through the Alaska Board of Fish & the Alaska Department of Fish & Game, to make meaningful efforts to study and mitigate the impacts from European Green Crab on our food resources and the ecosystem as a whole, Tlingit & Haida also calls upon other Tribal Governments, local municipalities, federal agencies, the University of Alaska, and any other entity that has a vested interest in protecting the sustainability of marine resources in Southeast Alaska to contribute to mitigating the impacts from invasive European Green Crab in any way they can.

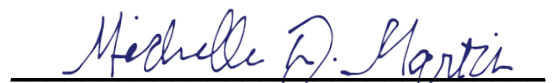
ADOPTED this 25th day of September 2026, by the Ninety-First Tribal Assembly of the Central Council of the Tlingit & Haida Indian Tribes of Alaska

CERTIFY



President Richard J. Peterson

ATTEST



Tribal Secretary Michelle D. Martin



October 12, 2026

Madam Chair Carlson-Van Dort and Board of Fisheries Members:

Concerned Area M Fishermen (CAMF) has participated in the Board of Fisheries (board) process and meetings since 1984. CAMF represents the drift gillnet fleet in Area M (Alaska Peninsula) and has over 100 members.

Concerned Area M Fishermen (CAMF) asks the board to decline Agenda Change Requests (ACR's) 6–11 and ACR 13 at the October 28–29 Work Session. These requests have not demonstrated grounds under the ACR policy to consider outside the regular meeting schedule. The sections below explain why CAMF believes the ACR requests have not established a qualifying reason to change the schedule. Supplemental background information is provided on a separate page for reference. ADF&G's staff assessment for this work session also supports CAMF's position. ADF&G finds that ACRs 6–11 and 13 meet none of the three ACR criteria.

CAMF understands the concerns about salmon returns in certain Western Alaska river systems. This past summer, the Yukon River, which is central to much of this discussion, saw stronger summer chum and Chinook salmon returns. Those improvements should be part of the board's consideration. Our objection is to changing the meeting schedule without an adequate basis under the board's policy. We ask the board to evaluate each request against that policy before deciding whether to take up the proposed regulation.

The criteria for changing the meeting schedule

Under 5 AAC 39.999, the board may accept an ACR for a fishery conservation purpose, to correct an error in a regulation, or to correct an effect on a fishery that was unforeseen when a regulation was adopted. The ACR criteria provides the board specific direction and CAMF asks the board to decline these requests as the criteria are not met. Disagreement with the Department of Law's decision to overturn the board's decisions at that meeting does not establish an error in a regulation or an unforeseen effect on the fishery, or fishery conservation purpose.

ACR's 6 and 7 Ten-day June closure

ACR's 6 and 7 seek to restore a ten-day June closure considered at the regularly scheduled seven-day Alaska Peninsula/Chignik meeting in February 2026. CAMF believes that ACR's 6 and 7 do not meet any of the ACR criteria since numerous past scientific studies from Area M chum catches include fish from many regions and cannot be treated as solely Yukon River fish. CAMF asks the board to decline these requests because they have not adequately established a qualifying basis for changing the schedule. ADF&G's staff comments explain that harvesting local and non-local stocks is a longstanding, understood feature of this mixed-stock fishery. That history matters when assessing whether an effect was unforeseen.

ACR 8 Post June Chinook caps and fishing time reductions

ACR 8 concerns post-June Chinook caps and fishing time reductions. CAMF asks the board to decline this agenda change request because it has not established a qualifying basis for consideration outside the regular meeting schedule. This ACR mandates the harvest of chinook salmon when many areas of the state are allowing non-retention which will benefit chinook salmon runs. ADF&G's staff comments also find that ACR 8 meets none of the three ACR criteria and ADF&G has already taken actions, such as in 2025, in the fishery for the conservation of Chinook salmon.



ACR's 9 and 10 Gillnet depth and seine size

ACRs 9 and 10 seek changes to drift gillnet depth and seine size. CAMF believes these requests have not adequately shown that the gear changes provide a conservation basis for changing the schedule, correct an error in a regulation, or address an unforeseen effect when a regulation was adopted. A preference for different gear limits does not itself establish one of those grounds. ADF&G's staff comments explain that the board adopted the 90-mesh depth limit for drift gillnets in 1990 because of concerns about the chum salmon harvest. The ACR 9 attempts to reduce the gillnet depth to 70 meshes. The current 375-mesh depth limit for purse seines has been in place since before 1985. These gear limits have been part of the fishery's regulations for decades and ACR 10 wants to reduce the seine depth to 325 meshes and reduce seine length as well. Neither ACR's 9 or 10 meet any of the ACR criteria.

ACR 11 Chinook retention in purse seine fisheries

CAMF asks the board to decline ACR 11 because it has not established a qualifying reason for consideration outside the regular meeting schedule. ADF&G's staff assessment also finds that this request meets none of the three ACR criteria. ADF&G has taken unprecedented actions to conserve Chinook salmon in the Westward Region by restricting numerous commercial fisheries. Mandating that Chinook salmon over 28" inches in length be retained when they could be released and potentially return to their river of origin is not a conservation-based approach.

ACR 13 Statewide Chinook retention and reporting

ACR 13 seeks statewide mandatory Chinook retention and disposition reporting. Identifying a reporting concern does not automatically establish grounds to change the schedule. CAMF believes the request has not adequately demonstrated why mandatory retention, including its interaction with existing live-release rules, qualifies under the conservation, regulatory-error, or unforeseen-effect criteria. A statewide proposal of this scope should receive review through the regular process. CAMF asks the board to decline ACR 13. Staff identifies commissioner authority over 5 AAC 39.130, while recognizing board authority over the issues, and potential Pacific Salmon Treaty and protected-stock complications.

In summary regarding ACR's 6-11 and ACR 13, the board's regular meeting schedule allows the public to prepare for review of regulations. CAMF believes these agenda change requests have not demonstrated the grounds required to change that schedule.

We respectfully ask the board to decline ACRs 6-11 and ACR 13 under the ACR policy. The board considered Alaska Peninsula/Chignik issues at its regularly scheduled seven-day meeting in February 2026, which required substantial time and expense for the public and staff. These ACR's have not established a qualifying basis to revisit those issues outside the regular cycle. We see no reason to re-address any of the issues that occurred at that meeting again.

Sincerely,

Bob Murphy, Executive Director
Concerned Area M Fishermen (CAMF)
Kodiak, Alaska



Supplemental Background Information

The following information provides background on Area M fisheries and Western Alaska salmon stocks. CAMF's comments on whether the ACRs meet the criteria are contained in the preceding letter.

CAMF asks the board to evaluate the expected benefit of these restrictions using stock-specific harvest rates and additional spawners, rather than total Area M catch.

The 1987 South Alaska Peninsula tagging study tracked chum salmon from South Unimak and the Shumagin Islands to their destinations. Its Yukon River summer chum findings warrant review alongside later genetic studies as historical context for the June fishery.

ADF&G reports that the Western Alaska Salmon Stock Identification Program (WASSIP) estimated the June fishery's harvest rate on the Coastal Western Alaska (CWAK) chum group during 2007–2009, are minimal. The CWAK group includes several river systems, some of which are found in the Bristol Bay watershed including the Nushagak River, not just the Yukon River.

ADF&G's 2022–2024 June genetics summary estimated that Japan and Russia together contributed about half of the chum catch, Coastal Western Alaska about one quarter, and the Upper Yukon River less than one percent. These are catch proportions, not harvest rates. Coastal Western Alaska includes more than Yukon River chum salmon stocks.

Preliminary Yukon passage estimates improved in 2026: summer chum increased to about 1.01 million from 347,000 in 2025, and Chinook to about 104,000 from 60,000. ADF&G's August 17 Kuskokwim River assessment reported about 559,000 chum salmon passing the sonar, compared with 159,000 on that date in 2025. These are passage estimates, not final spawning escapements; some stocks remain below goals, including projected Yukon fall chum shortfalls at the Canadian border. Fall Yukon River chum salmon are not harvested in the June South Unimak and Shumagin Islands fishery.

Area M drift gillnet fleet have taken voluntary actions to avoid chum salmon. ADF&G documented drift fleet standdowns in 2025, and CAMF reports continued voluntary standdowns in 2026. These efforts demonstrate the willingness to reduce the chum salmon harvest, without claiming a detectable effect on river returns.

END

October 13, 2026



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Alaska Board of Fisheries: ADF&G, Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: **Opposition to Agenda Change Requests 2 and 3**

Dear Chair Carlson Van-Dort and Members of the Board,

Cordova District Fishermen United (CDFU) appreciates the opportunity to comment on ACRs submitted for the coming meeting cycle. **CDFU opposes acceptance of ACRs 2 and 3 at the October 2026 worksession.** Neither request demonstrates a fishery conservation need warranting consideration outside the regular cycle, identifies a regulatory error, or establishes an unforeseen effect of an adopted regulation, as required under ACR guidelines found in 5 AAC 39.999.

ACR 2 — Copper River commercial salmon fishery openings: The department already has and utilizes tools to adjust fishing time and area using run timing, environmental conditions, harvest information, and passage estimates as indicators to trigger action. The Board delayed the commercial opening to May 22 beginning in 2025 to protect early-returning salmon. This additional request does not identify a regulatory error or unforeseen effect requiring additional action outside the regular cycle.

ACR 3 — Statewide hatchery production cap: The request provides no concrete analysis or rationale for the proposed statewide cap of fewer than 100 million eggs. It identifies neither a regulatory error nor an unforeseen effect of an adopted regulation. Broad assertions about ocean competition do not establish that this sweeping change meets the criteria for out-of-cycle consideration, particularly considering the Board's recent and regular assessment of hatchery topics in-cycle.

ADF&G's staff assessment likewise concludes that neither request meets any of the three ACR criteria. CDFU respectfully urges the Board to decline both requests and preserve the regular proposal process for consideration of these issues.

Sincerely,

Michael Hand, President, Cordova District Fishermen United

Name: Andrew Couch
Myself

Community of Residence: Palmer / Mat-Su Valley

Upper Cook Inlet Stock of Concern Designations -- I am in favor of the following Designations for Northern Cook Inlet salmon stocks in particular, and would encourage the Board to request relevant data from ADF&G during the stock status report. Note that ADF&G did not provide inclusive useful data on the first two stocks I am recommending for designation.

1. LITTLE SUSITNA RIVER SOCKEYE SALMON -- STOCK OF YIELD CONCERN -- while I agree with ADF&G's statement that most sockeye stocks are doing well in Upper Cook Inlet. Little Susitna River sockeye is distinctly different. In the very early 2000s a Northern Cook Inlet Area sportfish management report referred to the Little Susitna River sport sockeye salmon fishing as the most productive sport sockeye salmon fishery in the Knik Arm drainage. During the early 2000s and previously production from this stock was much more robust than at present. The Department had previously rebuilt this stock through hatchery enhancement. There has been no sockeye salmon spawning escapement goal for this stock -- however - there is significant statewide sportfishery harvest survey data that document the inriver decline in yield. In addition sockeye passage through Little Susitna River Weir at a lower river location SINCE 2013 document current inriver sockeye numbers below what inriver harvests at one time averaged.

2. DESHKA RIVER COHO SALMON -- STOCK OF MANAGEMENT CONCERN -- While several seasons of incomplete weir counts certainly could be used to question the measure of chronic inability to meet the established coho salmon SEG. The record of sport fishery restrictions and / or coho harvest closures over the past 4 years paint a more conclusive picture. These restrictions and closures show a chronic inability to attain the guidelines provided in the Northern District Salmon Management Plan. While ADF&G's post season coho survey counts at multiple locations further up the Susitna River drainage have no established escapement goals they do show a long term history of continually declining coho escapements throughout the Susitna River drainage. Therefore, if the BOF was to determined insufficient data to designate a Deshka River stock of management concern --- the Board should have a discussion with ADF&G as to whether the Deshka River (which the department uses as an indicator of coho abundance for the entire Susitna River drainage) and / or the entire Susitna River drainage should be considered as a Stock of Yield Concern. ADF&G's harvest survey data shows a significant drainage-wide trend in declining coho salmon harvest in what ADF&G considers the largest coho salmon producing drainage in all of Cook Inlet.

3. I agree with and support ADF&G's assessment that all wild Upper Cook Inlet Chinook salmon stocks should be designated as at least Stocks of Management Concern. However, the BOF should explore whether at least two Chinook stocks already designated as Stocks of Management Concern might now warrant Stock of Conservation Concern. Recent inriver

returns of less than 100 Chinook in both Alexander Creek and Theodore River should likely be discussed as to whether they would meet a Sustainable Escapement Threshold (SET)? and the probability of similar (or lower) future spawning escapements for those two stocks? Finally with declining Age/ Sex /Length decreasing Chinook salmon fecundity throughout Alaska what is a likely outcome for such small spawning populations?

4. I support and request the BOF in conjunction with ADF&G and the public develop a Jim Creek weir-based coho salmon spawning escapement goal. This could be a BEG, SEG, OEG, Inriver goal, or lower bound goal. Such a goal should help better sustain this resource, better inform all user groups, and better maximize benefit from both the Jim Creek coho salmon resource and the Jim Creek Weir project (one of the most stable weir projects in Northern Cook Inlet).

5. I submitted and continue to support ACR 2 for conservation reasons as outlined in 5 AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries,

Thank you for BOF, ADF&G, and public consideration of proposal-type ideas at the October 2026 Board of Fisheries work session in Anchorage. I plan to be available and may submit additional supporting record copies (RCs).

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To
R26080

OCT 13 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

We write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments on Agenda Change Requests being considered at the upcoming Alaska Board of Fisheries Work Session. During our October 13-15, 2026 meeting in Fort Yukon, we voted to submit Council comments as noted below.

The Council voted unanimously that the following ACRs **should be taken up out of cycle for conservation** reasons in alignment with the criteria specified in 5 AAC 39.999.

- **ACR 2 - Specify escapement objectives that must be met prior to opening the Copper River District to commercial fishing for salmon**

There are conservation concerns for Chinook Salmon in the Copper River. Additionally, in-river subsistence harvests have required in-season emergency restrictions and closures in attempts to meet escapement goals. Commercial fishing needs to be delayed until Miles Lake sonar counts indicate that objectives are being met.

- **ACR 3 - Reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually**

The extreme excess of hatchery releases is disrupting food webs in the marine environment and leading to competition with wild salmon stocks. This is a major conservation concern and needs to be addressed immediately given the poor returns of Chinook and Chum Salmon across the State, especially the Yukon River. A growing body of scientific evidence shows that hatchery salmon compete with wild salmon for resources and impact the diet, growth, fecundity, productivity, and abundance of wild salmon and other species in the marine environment. The State of Alaska needs to reduce hatchery production immediately so that our struggling wild salmon stocks have a better chance at health and survival.

- **ACR 7** – Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear in the South Unimak and Shumagin Islands June Salmon Management Plan
- **ACR 8** – Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to enforce king salmon caps with reductions in commercial salmon fishing time in the South Alaska Peninsula
- **ACR 9** – Reduce maximum gillnet depth in the Alaska Peninsula Area to 70 meshes
- **ACR 10** – Amend Alaska Peninsula Area seine specification to reduce net size
- **ACR 11** – Prohibit discard of Chinook salmon caught in purse seine gear in the Alaska Peninsula and Chignik areas

These ACRs seek to re-visit actions that were already taken by the Board of Fisheries but were never implemented. They are urgently needed actions for conservation purposes. Actions on these requests would allow more salmon to return to Western Alaska streams to spawn and aid in the rebuilding of struggling stocks, many of which have not been meeting escapement goals or subsistence needs for quite some time. Preliminary 2026 monitoring data indicates that Chinook and Fall Chum salmon escapement goals into Canada will not be met, and many US tributary goals were not met as well. Subsistence fishing on the Yukon was closed for Chinook Salmon and heavily restricted for Chum Salmon. The voiding of proposals 127, 135, 141, 147, and 148 removed hard fought protections for Western Alaska salmon and led to an increase in the interception of Chum Salmon in the commercial intercept fishery in 2026. Immediate action is needed to restore these protections and require the burden of conservation to be shared by the commercial industry.

- **ACR 13** – Establish a statewide Chinook retention and disposition reporting standard for commercial salmon fisheries

Action on this ACR is needed to fill data gaps about exploitation rates of Chinook Salmon. Chinook Salmon all over Alaska are in varying stages of critical loss. If this action is implemented, the additional data would lead to more informed fisheries management and Chinook Salmon conservation.

Thank you for considering our comments on the above proposals. If you have any questions or would like to follow up, please contact us through our Subsistence Council Coordinator Brooke McDavid, at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Robert “Charlie” Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

Name: Jeff Farvour
Myself

Community of Residence: Sitka

Comments re ACR 13

Dear Chair Carlson-Van Dort and Board,

My name is Jeff Farvour. I live and commercially troll for salmon out of Sitka. Our commercial salmon troll fishery is a low volume, low impact hook and line fishery. The chinook portion of our fishery is largely governed by a robust and complex process through the Pacific Salmon Treaty (Treaty), ADFG and NOAA as well as the BOF. As such, passage of ACR 13 would likely result in significant Treaty consequences.

ACR 13 would not achieve any the the Boards ACR policy objectives but would increase an unnecessary amount of chinook mortality as commercial troll fisherman carefully release fish that we are required to, per regulation. Due to the nature of these fish being caught by hook and line, these released fish are in very good condition thus have a very low mortality after release.

Sincerely, Jeff Farvour

Name: Deanna Flynn
Myself

Community of Residence: Anchorage
Support of ACR 5

Name: Mark Holst
Myself

Community of Residence: Sitka

Hello, my name is Mark Holst, I live in Sitka and own a 46 foot Troller called the Hoyden. My perspective comes from that of a life long hook and line Troller.

I strongly Oppose ACR 13.

As a hook and line fisherman, when I catch an undersized or out of season Chinook salmon it is still alive and healthy. This proposal would require me to take a healthy Chinook salmon, that would otherwise be gently released back into the ocean alive and well, and instead kill that Chinook salmon. All in the name of Escapement based management. Creating a management system with the intent of counting mortality by increasing mortality only worsens the very problem this ACR seeks to address. Taking more Chinook salmon out of the water does not put more Chinook salmon in our rivers.

This ACR also states that Alaska should have a uniform statewide accounting standard. I disagree. Alaska occupies 665,384 square miles of land and 6,640 miles of general coastline, Alaska is a very big place with many very different fisheries. Lumping all salmon fisheries together is a poor management method. Trolling in southeast Alaska is very different than gillnetting in the Nushagak district. In recent years we have seen the Southeast Alaska stocks of concern moving in the right direction with 7 out of 11 making escapement goals (see Southeast Alaska Chinook salmon run forecast, January 5th 2026). Enforcing 100 percent retention on all Chinook salmon would have a severely detrimental effect on our current stocks of concern and would greatly increase mortality in the Troll fishery.

Over all this ACR creates more problems than it solves. I would like to continue to see ADFG use conservation based management that does not increase Chinook salmon mortality.

Thank you Madam Chair and Board of Fisheries members for taking the time to read my comments.



October 13, 2026

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526
Via email: dfg.bof.comments@alaska.gov

RE: Public Comments by KRSA for October 28-29, 2026 Work Session Meeting

Chair Carlson-Van Dort and Members of the Board:

Kenai River Sportfishing Association (KRSA) submits these timely public comments regarding several agenda change requests (ACRs) scheduled for consideration at the Alaska Board of Fisheries Work Session Meeting in Anchorage on October 28-29, 2026. KRSA is committed to sustainable fisheries management, fair access to fishing opportunities, and science-based decision-making in Alaska.

ACRs 6, 7, 8, 9, 10, and 11

KRSA supports acceptance of ACRs 6, 7, 8, 9, 10, and 11. These ACRs seek to bring back before the Board a series of proposals considered and passed by the Board of Fisheries during its regularly scheduled February 18-24, 2026 meeting on Alaska Peninsula, Aleutian Islands, and Chignik Finfish (Area M). The resulting proposals were held by the Department of Law and were never formally adopted into regulation.

At this point in time the public, including the hundreds of individuals that personally participated in the meeting, have no idea as to the fate of these proposals. These ACRs clearly meet the criteria for acceptance on an ACR by the Board. The corresponding regulations directly address fishery conservation purposes and concerns which were well established by the Board in deliberations for related proposals adopted during the 2026 Area M meeting. Acceptance of these ACRs would also provide an opportunity to address the fishery impacts caused by the Department of Law's unforeseen failure to implement regulations the Board adopted.

ACR 13

KRSA supports acceptance of ACR 13. An accurate estimate of the harvest of king salmon in the commercial fisheries is essential for effective management. This ACR meets the fishery conservation purpose or reason criteria for acceptance on an ACR by the Board.

King salmon throughout Alaska are at historically low levels of abundance. Chronic failures to reach established escapement goals have resulted in widespread listings of king salmon Stocks of Concern. Uncertain estimates of commercial king salmon harvest substantially limit the ability of fisheries managers to ensure king salmon escapements. Improving the accuracy of these estimates is an important step toward responsible, science-based management and the conservation of Alaska's king salmon.

Respectfully submitted,

A handwritten signature in cursive script that reads "Shannon Martin".

Shannon Martin
Executive Director
Kenai River Sportfishing Association

Public Comment Regarding Agenda Change Request 5: European Green Crab Reclassification

To the members of the Alaska Board of Fisheries.

I am submitting this comment in support of Agenda Change Request 5, which asks the Board to consider reclassifying European green crab from a Class A to a Class B banned invasive species under 5 AAC 41.075.

My name is Bergen Kludt-Painter. I am 22 years old, was born and raised in Alaska, and am a lifelong resident of a state where our connection to the ocean and its resources is an important part of who I am. In addition to being avid enjoyers of Alaska's natural beauty, my family enjoys recreational Dungeness crab fishing for personal use, and protecting the health of Alaska's marine ecosystems matters to me personally.

I was made aware of this issue through an internship with Alaska Sea Grant, where I had the opportunity to engage in researching, monitoring, and community outreach around European green crab in my hometown of Petersburg. Hearing first-hand accounts and seeing pictures communicating the dire state of the invasion in Metlakatla and Ketchikan led me to recognize a disconnect between the state of Alaska and southeast localities on this issue. This is in light of statements that have been made by the Alaska Department of Fish and Game leadership claiming the influx of European green crab doesn't require state action due to a lack of evidence of their harm.

This letter is meant to provide background information on an issue of increasing importance and urgency in Southeast Alaska, and which will likely become of statewide concern if action isn't taken soon. The highly invasive European green crab (EGC) has reached Alaskan shores and is spreading. According to current knowledge, larger EGC populations in Alaska are primarily localized to the communities of Metlakatla and Ketchikan, but this is likely an underestimate of their geographic spread. EGC carapaces have been found on Gravina Island, Prince of Wales Island, including Kasaan, and have been noted as far north as Etolin Island, just south of Wrangell.

EGC were first discovered in Southeast Alaska on Annette Island in 2022 by the Metlakatla Indian Community, who have since launched a trapping campaign to remove EGC from sensitive habitat. In the following four years, the numbers of EGC trapped have increased significantly. Between 2024 and 2025, the annual recorded number of crabs trapped went from 1,460 to 41,000. Metlakatla Indian Community has caught 30,500 EGC as of August 26th, 2026. Last year Ketchikan had five live EGC and the number caught this year so far is 6,000. Further south, Haida Gwaii has caught around

2 million since 2020. These numbers do not account for areas where EGC are living undetected.

I am open-minded regarding state solutions to managing the spread of European Green Crab and I want to work collaboratively with the state to help mitigate this issue. People may have different ideas about how to best address this issue through policy, but most people and organizations involved with this issue in Alaska and beyond agree that this is an issue that needs to be addressed. These include Oregon and Washington Sea Grant, the Washington Department of Fish & Wildlife, Tlingit and Haida, the Ketchikan Indian Community, the Metlakatla Indian Community, the Organized Village of Kasaan, Hydaburg Cooperative Association, Wrangell Cooperative Association, and the Petersburg Borough among others.

Although the Aquatic Resource Permit system is well-suited to the needs of scientific researchers and educators to study aquatic invasive species, this system is less equipped to allow European green crab management. The specific, limited nature of the resource permit is ill-suited for allowing members of the public to engage in targeted trapping on a larger scale without significant administrative burden on both individuals and the state.

European green crab pose a growing threat to Alaska's native crab and shellfish populations and the habitats they depend on. They compete with native species for food and shelter, prey on juvenile crabs and shellfish, and damage eelgrass beds that provide important habitat for juvenile salmon and other crab species like Dungeness and King crabs.

The numbers already being reported in Southeast Alaska are concerning. According to personal communications with the Metlakatla Indian Community, the number of European green crab trapped in Metlakatla increased from approximately 1,460 in 2024 to more than 41,000 in 2025. These numbers demonstrate the scale of the challenge facing communities that are already working to control their spread.

Reclassifying European green crab to Class B would provide an opportunity for greater public participation in removing these invasive crabs when they are encountered, while allowing their transport for consumption only when dead under the proposed classification. This change alone will not solve the problem, but it is one practical step toward a broader response that includes targeted trapping, public education, monitoring, and collaboration with affected communities and Tribal organizations.

Alaska has an opportunity to learn from other regions that have faced this invasion and to act before the problem becomes more difficult and expensive to manage. I recognize the importance of preventing harm to native species, and I believe any expanded public

involvement should be supported by clear identification guidance and responsible removal practices. While these are areas of law that the legislature can and should take action on, a reclassification of European green crab from Class A to Class B banned invasive species would make future mitigation policies more achievable by removing a major roadblock.

Thank you for your time and for considering my perspective as a young Alaskan who cares deeply about the future of our state's natural resources. I respectfully ask the Board to accept this Agenda Change Request for consideration and to continue working toward solutions that protect Alaska's native marine species, coastal habitats, and fisheries. As an Alaskan who hopes to continue enjoying our fisheries for years to come, I believe we should take this threat seriously while we still have opportunities to respond.

Note: Please see the policy paper and background document below for more information on this issue's salience and potential policy solutions for those at the state level to employ beyond reclassification of European green crab.

Executive Summary:

European green crabs are one of the top 10 most destructive aquatic invasive invertebrates in the world and have spread into Alaskan waters in the last few years (ISC, 2021). In Metlakatla, between 2024 and 2025, the amount of live European green crabs trapped exploded from 1,460 to over 41,000. As of August 26th, 2026, Metlakatla Indian Community has caught 30,500 European Green Crab on Annette Island this year alone. Tribal and other volunteer trappers on Ketchikan's Revillagigedo Island have trapped just over 4,000 live EGC, since they were first discovered during the summer of 2025. These numbers are likely an undercount, due to limited resources and capacity of local trappers in the affected communities. A single juvenile female EGC can release up to 185,000 eggs twice per year into the ocean to float on the currents and spread across coastal communities (Fisheries and Oceans Canada, 2021).

This brief tackles the issue of European green crabs which are spreading across southeast Alaska and surveys several potential policy solutions to mitigate the negative impacts of these invasive crabs. This analysis relies on research from across the globe, both comparing other invasive species management programs and strategies as well as investigating the applicability of other states and countries' responses to European green crab. As a result of this analysis, a combination of targeted trapping and public education outreach emerged as the recommended policy solution to address the EGC problem currently unfolding in Alaska.

Policy Problem:

Originally European Green Crab (EGC) were brought over to the east and west coasts of the United States in ballasts of large ships several centuries and decades ago respectively. Once relocated, they may be dispersed at significant distances on ocean tides in their larval state

(Yamada et al, 2021). State governmental action is required to prevent and mitigate EGC's harm to the environmental and economic wellbeing of both people and ecosystems. EGC compete for food and habitat and actively prey on native shellfish and crabs, especially juvenile ones.

EGC's are shore crabs, generally drawn to shallower areas which is why they tend to target juvenile crabs of other species. They tolerate a wide range of temperatures and salinity levels, making it easy for them to compete with native crab species, including the commercially and recreationally important Dungeness crab. The protected bays and estuaries across the state of Alaska (Yamada et al, 2021; Fisheries and Oceans Canada, 2021) are particularly vulnerable to colonization. Despite adult Dungeness crabs being larger than EGCs, the latter's stronger pinching strength, harder shell, and more aggressive behavior makes it a formidable predator to the Dungeness crab population (NOAA 2025; Lutto, 2022). McDonald (2001) found that EGC consistently outcompeted dungeness crab for shelter one-on-one due to the former's superior pincer strength and aggressive behavior (McDonald et al, 2001). This leads to dungeness crabs retreating to parts of the coast that leave them more exposed to predating fish and birds (McDonald et al, 2001). A single juvenile female EGC can hold 185,000 eggs and spawn up to twice per year (Fisheries and Oceans Canada, 2021) in contrast to Dungeness crabs, which only breed every other year (ADF&G, n.d. b). Additionally, EGC alter landscapes by excavating eelgrass beds in search of soft-shelled mussels and clams. These beds provide important juvenile salmon habitat. These excavations also contribute to coastal erosion (Drinkwin et al, 2019).

Additionally, European green crabs change landscapes by excavating eelgrass—an essential environment for juvenile salmon to mature—and will burrow into coastal marshes in search of soft-shelled mussels and clams, which causes the entire coastline to degrade and recede (Drinkwin et al, 2019). Because of their ravenous appetite and preference for estuaries and

shoreline environments, EGCs dig deep to find shellfish to eat. Doing this requires mowing down eelgrass—a plant relied on by juvenile salmon and dungeness crabs to ward off predators. The excavation required for EGCs to find mussels and clams causes shoreline erosion, which radically changes the natural environment and jeopardizes the habitat of coastal species like shore crab.

Furthermore, **European green crab pose risks that extend beyond commercial fisheries and ecosystem damage. For Southeast Alaska Tribes, declines in Dungeness crab, shellfish, salmon habitat, eelgrass, and other nearshore resources can directly affect** Indigenous food systems, customary and traditional harvesting, community sharing networks, and the intergenerational transfer of harvesting knowledge and cultural practices. **These resources are part of relationships among people, place, culture, and stewardship that support community health and continuity.**

ECG's are actively being targeted and monitored by citizen and professional scientists in places like Oregon and Washington (EarthFixMedia, 2016). The reason proactive and aggressive approaches are so crucial is because after EGCs take root, they're nearly impossible to get rid of due to females' high yield and frequent spawning. A single juvenile female EGC can hold 185,000 eggs and spawn up to twice per year (Fisheries and Oceans Canada, 2021). Trapping is the most effective tool to use for removing European green crabs without putting other native aquatic species and ecosystems at risk (Government of Canada, 2022; EarthFixMedia, 2016).

Other states and provinces along the Pacific Northwest have taken action to quell the rising tide of EGCs, but have often done so with too little resources after the problem has reached critical levels. After rapid EGC population increases, Governor Inslee issued Emergency Proclamation 22-02 in January 2022. Washington subsequently established an Incident

Command System that incorporated Tribal co-managers and other partners into coordinated response efforts. The Legislature provided \$8.568 million in initial emergency funding and subsequently maintained approximately \$6 million annually for EGC response (Turner, 2025). After Washington declared a state-wide emergency on European Green crab, the State worked to quell population growth in the Salish Sea through targeted trapping and monitoring. In 2024, WDFW developed the resulting 2025–2031 Management Plan collaboratively with more than 40 co-managers, Native American Tribes, agencies and partners. This plan identifies permanent trapping needs, efficiencies, organizations and Tribes requiring continued funding, federal funding opportunities, and recommended appropriations. These efforts are carried out by tribes and non-government entities that have been vetted at the state level to limit the risk of bycatch and targeting of vulnerable, native species (Inslee, 2022). The state of Washington currently allocates a total of \$6 million annually to address this problem (Bush, 2024). Oregon manages European green crab through allowing people to catch up to 35 daily with a recreational shellfish permit and allows commercial oyster farms to trap European green crab that target the oysters (Lindsey, 2026). Sam Chan, a professor with Oregon State University and the current State-wide aquatic invasive species specialist in Oregon, said the state is engaging in market research and development to create incentives for a green crab fishery in Oregon (pers. comm. Sam Chan, 2026). While still in its early stages, the hope is to create market incentives for those in commercial fisheries to remove more green crab from marine ecosystems. Having been present on the East Coast of the U.S. for the last two centuries, European green crabs are starting to make it onto people's plates through a soft-shell fishery and with people using them to make whiskey (New Hampshire Sea Grant, 2025).

Turning back to Alaska, the community of Metlakatla, as the only Alaska Native reservation, has taken comprehensive action to monitor and intervene in the issue of EGCs. For the past few years, the tribe and community has been building out trapping and monitoring capacities as the crabs' population continues to increase. Between 2024 and 2025, the amount of live crabs trapped exploded from 1,460 to over 41,000. As of August 26th, 2026, Metlakatla Indian Community has caught 30,500 European Green Crab on Annette Island this year alone. Tribal and other volunteer trappers on Ketchikan's Revillagigedo Island have trapped just over 4000 live EGC, since they were first discovered in summer 2025.

To date, the Alaska Board of Fisheries has addressed the problem of EGC invasion by listing them as a banned invasive species. According to ADF&G regulation 5 AAC 41.075 "Classification of banned invasive species," species are categorized based on their potential to: "(1) survive, grow, reproduce, and establish reproductive populations in this state; (2) cause a genetic alteration of a species indigenous to this state; (3) compete for food, habitat, and resources with a species indigenous to this state; (4) degrade or make uninhabitable habitats used by species indigenous to this state; (5) transmit a disease to a species indigenous to this state or to humans; (6) threaten the health or population of a species indigenous to this state or to humans; (7) cause economic or environmental harm" (AAC 41.075 (Cornell Law School Legal Information Institute, n.d.; ADF&G, 2015, p. 1-2). This classification is broken into Class A and Class B. The import, possession, transport, sale, and consumption of Class A banned invasive species, alive or dead, is illegal in Alaska. However, Class B banned invasive species are invasive species considered to have food value and are thus allowed to be transported for consumption as long as they are dead (ADF&G, n.d. a).

On March 18, 2026, the Ketchikan Indian Community filed a request for emergency action to the Department of Fish and Game, requesting that EGC be reclassified from Class A to Class B so that a sport fishery could be developed for EGC. That request was denied by ADF&G Commissioner Doug Vincent-Lang on May 19, 2026. On August 28, 2026, we submitted an Agenda Change Request to the Alaska Board of Fisheries requesting out-of-cycle consideration of a parallel proposal to reclassify European Green crab from Class A to Class B under ADF&G regulations. Our belief is that allowing individuals to harvest EGC when they come across them on the remote and unpopulated beaches of Alaska will help identify newly colonized areas and supplement, however inadequately, the current suppression efforts by local tribes and the minimal efforts currently undertaken by ADF&G. We recognize that this simple change will not be sufficient to mitigate the negative effects of the EGC invasion, but believe it lays the groundwork for future beneficial policy changes, such as those discussed below.

This is an important policy issue because European green crab have been shown to target both soft-shelled shellfish, juvenile crabs, and salmon which negatively impacts commercial fisheries and the way of life for many coastal communities. Washington is currently dealing with the massive financial undertaking of removing EGC after they've taken hold in the state. Raquel Crosier, the incident commander for European green crab with Washington Department of Fish and Wildlife, says the reason why prompt action is so important is because after European green crabs take hold, they're impossible to get rid of and hard to manage, making proactive policy the most effective and affordable approach (pers. comm. Raquel Crosier, 2026).

Stakeholders:

There are many stakeholders involved in the evolving issue of European green crab in Alaska. These include coastal communities, commercial crabbers and salmon fishers, Alaska Native tribes, and subsistence, sport, and personal use fishers. Coastal communities are vulnerable to changing coastlines due to erosion which can be accelerated by EGC burrowing into mudflats in search of clams and other bivalves for food. Regardless of whether someone fishes commercially or for sport or subsistence, they are reliant on the coastal environment to be able to participate in this long-standing practice. Southeast Alaska Tribes hold longstanding stewardship responsibilities, Indigenous Knowledge, community monitoring capacity, and cultural relationships with the marine species and habitats threatened by European green crab. Tribes are therefore essential partners in early detection, rapid response, monitoring, suppression, research, public education, and long-term management. The relevant decision makers are the Alaska Department of Fish and Game which carries out regulations that are decided by the Board of Fisheries, the Alaska State Legislature which allocates funding to both state and non-state actors to support policy priorities, and the governor who can declare state disaster.

Status Quo

The status quo policy related to European green crabs requires people to acquire an aquatic resource permit to trap them and requires those without such licenses to note the location and share information about the encounter with the Alaska Department of Fish and Game without removal of more than one individual for identification purposes. Although this might be a sufficient policy for other invasive species limited to a specific, isolated location, the status quo is insufficient for preventing the spread of European green crab, which are carried great distances without human intervention on oceanic tides. Additionally, due to the sparse population and considerable size of Alaska's coastal communities, equitable compensation of the most impacted

communities is essential to ensure proper monitoring and management of European green crab populations as the issue continues to progress. Although the invasion of European green crabs in Alaska is currently limited to the communities of Metlakatla and Ketchikan, this certainly won't remain the case. Just in the few years since these crabs were first discovered on Annette Island, the population in the Metlakatla community has exploded and spread to Ketchikan in exponential numbers.

The policy alternatives worth considering at the state level are public education, a bounty system, market incentives to use green crab in products, targeted trapping efforts, and holding derby competitions to encourage members of the public to go out and catch European green crab.

Policy Alternatives:

State Bounty System:

A state bounty system is an incentive program that encourages people to remove certain species from the environment by allowing them to redeem them for money from the state government. A current example of this kind of program can be found in Washington, Oregon, and Idaho where a Northern Pike minnow can be redeemed for \$6-\$10 each during sport fishing season (Oregon Department of Fish and Wildlife, n.d.). Northern Pike minnows are an invasive species that preys on juvenile salmon and steelhead fish, making them an environmental hazard to freshwater ecosystems in the aforementioned states. In Alaska, due to the prolific nature of European green crab breeding, it might be more effective and financially savvy to implement a bounty for females only. Furthermore, due to the high cost burden the state would need to undertake, bounty-driven removal should be targeted toward high-value habitats to be cost-effective. Another aspect of this policy could include the state government providing free traps and gear to people interested in trapping EGC. This would remove some of the financial

barriers associated with trapping and utilize the effort and interest of passionate community members.

Market Incentives for Commercial Use:

Market incentives encourage commercial actors to utilize certain products or materials, like farming incentives that encourage corn production. The example to model this solution on is the Chesapeake Bay blue catfish market development program, which encourages processors to create value-added products with blue catfish (Petrowich, 2026). Although this program is still ongoing, consumers seem receptive to buying blue catfish (Scheld et al, 2024). This could apply to European green crab in Alaska by creating state incentives like tax credits, grants, or purchase guarantees for pet food, aquaculture feed, fertilizer, and bait manufacturers. Additionally, European green crab can be used to make seafood stock, or—if harvested in a soft shell state—can be consumed despite its usually hard exterior. Though European green crabs are small in comparison to king or dungeness crab, their popularity in the Mediterranean and growing consumer markets across the East coast of the U.S. showcase the economic viability of this versatile shellfish. Lindsey (2026) found that meat extraction using specialized processing equipment yielded ~29% high-quality meat recovery from wet weight which shows market viability in the direct seafood market (Lindsey, 2026). Not only are EGC valued for their meat, but also for the chitin which can be harvested from their shells and used for medical applications, increasing crop yields, pharmaceuticals, treating water for human consumption, and more (Tidal Vision, 2022; Sharp, 2013). Although the practice of harvesting chitin isn't commonplace in Alaskan fisheries, the anticipated influx of European green crab could create an economic opportunity that incentivizes the removal of the invasive crabs from the ocean (Hajiali et al, 2022).

Targeted Trapping Efforts:

This alternative would fund state-coordinated, geographically prioritized trapping operations in high-value habitats—eelgrass beds, juvenile salmon nurseries, Dungeness crab habitat, and mariculture leases—rather than attempting broad-scale eradication. It aligns with the "functional eradication" framework articulated by the Alaska Climate Adaptation Science Center, which prioritizes protecting vulnerable ecological and economic assets over impossible full removal (AKCASC, 2025). This solution is modeled off of the current Washington state policy that funds trapping and monitoring efforts of partnering organizations like nonprofits, tribes, and community organizations. It would be more effective if these targeted efforts aimed for intermediate sized EGC which Lindsey (2026) found to be most effective in reducing overall EGC population. Implementation would involve state provision of traps to tribal governments and community-based monitoring networks, coordination with the Alaska Invasive Species Partnership's Community-Based Early Detection Network, and integration of emerging detection technologies including environmental DNA (eDNA) sampling and NOAA/Rogue Detection Teams' K9 conservation dogs (Sanchez, 2025). The Metlakatla Indian Community's aggressive removal program provides the strongest domestic proof-of-concept: MIC removed 1,460 crabs in 2024 and approximately 33,000–41,500 in 2025, demonstrating both the scale of removal possible and the exponential population growth targeted trapping is designed to suppress (AKCASC, 2025). This alternative has higher upfront costs than education or derby models but produces measurable population reduction in the specific places EGC do the most economic and ecological damage.

Derby Competitions:

A derby-based approach would sponsor timed, prize-based EGC catching

events—modeled on lionfish derbies conducted by the Reef Environmental Education Foundation (REEF) and NOAA in the Florida Keys. These events have removed tens of thousands of invasive lionfish per event and generated substantial media attention (Malpica-Cruz et al, 2016). Applying this to Alaska could involve state funding being given to localities which could independently organize European green crab derbies and award the winners accordingly with minimal administrative burden being placed on the state government. Furthermore, these could be organized by regional nonprofits or tribal governments with categories like most crabs caught, largest crab, or team totals, with prize funding from state appropriations, private sponsors, or federal invasive-species grants. Derbies harness volunteer effort during peak reproductive periods, generate free public education through participation and media coverage, and build community investment in long-term monitoring. Something key to mention is that derbies produce episodic rather than sustained pressure on populations, and that without robust pre-event training they risk bycatch of native crab species—a concern that could be mitigated by pairing derbies with public education.

Comparison across Criteria:

These alternatives will be compared along the following criteria: equity, efficacy, efficiency, political feasibility, and environmental impact. Equity assesses the fairness of a policy across various demographic groups with the core question of *who is the most burdened by the policy and does that burden correspond with the amount of resources they have?* Efficacy investigates how well a policy is able to suppress or eradicate EGC and whether the policy indirectly incentivizes spread of EGC across the state. Efficiency looks at how the cost of a policy solution relates to how effective it is; like the cost to the state or other stakeholders involved for every EGC trapped. Political feasibility gauges how likely decisionmakers are to

find a policy acceptable based on: past voting behavior and legislation supported, priorities of represented constituents, and decisionmaking duty as stipulated in Alaska state code.

Environmental impact evaluates the impact on the overall wellbeing of the environment of a given policy, like whether the policy causes an increase in bycatch/harms native crab species or if it effectively intervenes to prevent damage.

Policy Solutions	Equity	Efficacy	Efficiency	Political Feasibility	Environmental Impact
Status Quo					
Bounty System					
Derbies					
Targeted Trapping					
Market Incentives					

Status Quo:

The status quo scores low on equity, efficacy, and environmental impact, medium on efficiency, and high on political feasibility. With this policy, the burden of monitoring and trapping falls to local actors like tribes and volunteers with minimal mechanisms to compensate people for their time and effort making its equity score low. While Metlakatla is able to make policy decisions related to European green crab due to tribal sovereignty, places like Ketchikan

are unable to do the same due to state regulations that require people to acquire an aquatic resource permit to trap and remove European green crabs. In addition to being inequitable, the status quo also has low efficacy at attaining comprehensive, consistent monitoring and trapping efforts due to the voluntary and highly varied efforts across coastal localities (Azzurro et al, 2026). Using Metlakatla as a case study, it's clear that EGC aren't going to naturally die off and will continue to spread as they have since their discovery in Alaska in 2022.

Derbies and Bounty Programs:

Derbies and bounty programs are similar tools that leverage public interest and involvement in removing invasive species from their local environment. Starting with bounty programs, an instructive example is the EGC bounty in Massachusetts. Despite the fact that the program allowed commercial clammers to redeem these crabs for money, the offered amount by the bounty was too low to offset the labor and time required, only offering \$0.40/pound (Larson et al, 2024). In order to equitably employ this program, a sufficient bounty price would need to be offered. With this information in mind, the equity of a bounty system is rated as medium (Larson et al, 2024; Olden et al, 2026). Turning to the efficacy of a bounty system, although some bounty programs elsewhere have succeeded in suppressing harmful, invasive species, others failed to garner sufficient participation or yielded fraud through people forging proof in pursuit of a reward or re-releasing invasive species back into the environment after claiming a bounty (Olden et al, 2026). Furthermore, in certain circumstances, people engaged in breeding invasive species to then turn them in in exchange for the bounty (Olden et al, 2026). For these reasons, there is a potential for a bounty system in Alaska to incentivize the further spread of European green crab. The efficacy of EGC bounties is questionable as Larson et al (2024) found

there to be “no huge impact observed from the bounty program,” which is why the efficacy of these programs is low (Larson et al, 2024, p. 4).

Moving onto efficiency, the cost of a bounty program increases linearly with how many invasives are caught. On top of the reward payments, the state must also invest in administrative verification and fraud prevention (Olden et al, 2026). The efficiency of an EGC bounty program could partially be improved through having a program only for female EGC to compensate for the fact that females can carry approximately 185,000 eggs (ADF&G, n.d. a). However, Larson et al (2024) found that cost-effective, self funded bounty programs require the target species to have a notable commercial value, which still hasn't been established anywhere in the U.S. for European green crab (Larson et al, 2024). Due to these reasons, a bounty program has low efficiency. The equity, efficacy, and efficiency of a bounty system hinges on how generous its incentives are and whether the state also mitigates the barriers to entry like extra costs related to boat access and required gear (Olden et al, 2026). Although Alaska hasn't had many bounty programs in its history, there is regional precedent for having a bounty program for EGC. The Northern Pikeminnow Sport-Reward Program has run since 1991 through the Pacific States Marine Fisheries Commission and has been relatively successful in both participation and removal (Larson et al, 2024). For this reason, and the cost that would be required to establish and maintain (Larson et al, 2024; Olden et al, 2026), a EGC bounty program has medium political feasibility. A bounty would encourage removal which is beneficial to the environmental welfare of native species of finfish and crabs. However, allowing members of the public to target EGC opens the door to potential misidentification which works against any efforts to protect native shore species which is why bounties' environmental impact is medium (Weingartner, 2026).

Derbies function similarly to bounties and rank comparably along the aforementioned criteria only differing along efficiency and political feasibility. Derbies are more efficient than bounties as they are more affordable for the state to implement in comparison to bounties (Malpica-Cruz et al, 2016; Larson et al, 2024). Additionally, derbies are common in Alaska for native species like salmon and other finfish which makes this solution highly politically feasible. Derbies rank as medium equity as they are most successful in areas with concentrated populations rather than places with the highest population of invasive species (Malpica-Cruz et al, 2016). Furthermore, both derbies and bounties are most useful in areas where an invasive species has already established a population and functional eradication is no longer feasible. Consequently, both solutions are ill-advised for Alaska as we are still in the early stages of EGC invasion in the state.

Market Incentives:

Market incentives for European green crab are government programs like grants and tax breaks or purchase guarantees that encourage private producers to create products with European green crab and, indirectly, remove them from the marine environment. These kinds of programs rank as medium equity because only processors and permitted commercial harvesters can reap the benefits of these incentives; if the ex-vessel prices of EGC are low, small fishers aren't able to participate even if the market grows (Scheld et al, 2024; Weingartner, 2026). Furthermore, there are supply-side barriers to creating a market for EGC like the lack of processing infrastructure or existing commercial interest in harvesting EGC (Weingartner, 2026). Programs like this do create income opportunities in coastal communities dealing with the EGC invasion, particularly for tribal members and volunteers already engaging in monitoring and trapping (Weingartner, 2026). This alternative rates as medium efficacy with the greatest risk of

incentivizing EGC spread compared to the other policy solutions listed in this brief (Weingartner, 2026; Giakoumi et al, 2019). According to Larson (2024), creating a market is the best way to decrease the EGC population based on a previous case study on lionfish (Larson et al, 2024). However, the study also showed market pressures like demand and potential profit weren't enough to outweigh the financial risks that come about when an invasive species is exploited beyond what it can sustain (Weingartner, 2026; Larson et al, 2024; Demirel & Tsakas, 2026). The efficiency for this solution is medium, with the costs to the state being relatively low as the cost of actual EGC removal is shifted to private actors. However, market returns are uncertain as is seen in the Maryland and Virginia blue catfish grant programs where actual market value of the target invasive species is unknowable before implementing the program (Scheld et al, 2024). The political feasibility is between low and medium, as this policy would require the Board of Fisheries to reclassify EGC as a Class B banned invasive species under 5 AAC 41.075 and create a fishery for EGC. Alaska could model a legislative framework off of the Oregon state's management, with defined areas that allow people to trap and catch them based on the extent of the spread, and a mandatory landing of all EGC (Lindsey, 2026). Finally, environmental impact rates as medium as this solution does remove crabs from high value habitat, but there are perverse incentives that can prevent a market from fully eliminating EGC (Larson et al, 2024; Demirel & Tsakas, 2026). Additionally, the live transfer of EGC—which is often the standard for other kinds of crab being brought to market—would place market needs in conflict with the current regulation which states the transportation of invasive species is illegal (Weingartner, 2026). If the regulations were changed to allow live EGC to be transported, this would jeopardize communities that haven't been colonized by EGC yet. All in all, market incentives are

a slow policy solution that takes time to develop properly and would be a good solution in the long-term, not a good preventative or first-step action for the state to take at this time.

Targeted Trapping:

Targeted trapping ranks as high equity, efficacy, and environmental impact and medium efficiency and political feasibility. Starting with equity, this policy involves the state directing resources to the most affected communities which allows stakeholders dealing with the issue to receive proportional compensation (Inslee, 2022). Additionally, the state funds the training and equipment required for partner organizations to engage in trapping efforts rather than relying on volunteer and independent, non-government investments in trapping and removal (Weingartner, 2026; Inslee, 2022).

Targeted trapping is highly effective, because it directly reduces populations in isolated areas (Azzurro et al, 2024). If this effort is undertaken soon in Alaska, there is a good chance that functional eradication is feasible, especially if trappers target intermediate sized crabs which help prevent the hydra-effect where a population rebounds when only large adults are removed from the environment (Green & Grosholz, 2021; Lindsey, 2026). Additionally there is no spread incentive risk, because the trapping would be done by professional/vetted parties and there is no private market incentive to maintain or move EGC.

While targeted trapping is expensive for the state to undertake, it is also the most effective for overall removal. Cost of removal is favorable at high densities but increases as densities fall (Taylor & Hastings, 2004). This makes the overall efficiency of targeted trapping medium.

The positive environmental impact of targeted trapping is high, because it directly protects marine assets of concern like eelgrass and habitats used for juvenile Dungeness crabs

and salmon as well as shellfish beds (Green & Grosholz, 2021; Azzurro et al, 2024). The use of trained crews helps minimize bycatch in comparison to public harvest (Weingartner, 2026).

While there is only two years of data, based on findings by the Metlakatla Indian community, targeted trapping appears to mitigate negative impacts of EGC on native species like Dungeness crabs and overall biodiversity (pers. comm. Nicole Reynolds, 2026).

Political feasibility for this alternative has a strong regional precedent in light of Washington's emergency proclamation and appropriations to address EGC (Inslee, 2022). Partnering with industry groups impacted by EGC could increase the feasibility as it would provide support to those most vulnerable to EGC's negative effects. This policy would, in the long term, be the most financially prudent action as it would prevent financial losses in Alaskan seafood markets (Leung, 2002).

Public Education and Outreach:

Education alone does not reduce EGC populations; its value is as a multiplier that increases the effectiveness and safety of every other alternative and enables early detection across Alaska's vast, sparsely populated coastline. Education on the issue of European green crab would leverage public stakes in marine ecosystems and allow impassioned members of the public to explore the issue further. This could take on many different forms; requiring educational modules for people to be able to legally trap European green crab, having state entities publicly share information on EGC identification, and up-scaling already existing workshops to arm members of the public with monitoring skills. State-led educational outreach would involve scaling up existing efforts like the information on EGC already available on the ADF&G website. Workshops open to members of the public could follow the model created by University of Alaska Southeast's Charmaine Lewis and Barbara Morgan who held an EGC

identification course in June 2025 (AKCASC, 2025). Education directly addresses ADF&G's stated concern that expanded public participation risks bycatch of native crabs (ADF&G, 2026), and it leverages existing agency and university infrastructure.

Final policy recommendation: Targeted Trapping with Education and Public Outreach

Hurdles:

The main hurdles for this recommendation that come with targeted trapping are the cost of funding and the administrative/logistical burden that come with coordinating an array of organizations and actors to carry out the trapping efforts. Although EGC education is more feasible within the current structure, as it could utilize community interest and the current University of Alaska system, this would place more pressure on public educators and would require compensation to maintain consistent public outreach.

Implementation:

ADF&G should serve as the State's lead coordinating agency, while implementation should occur in tandem with affected Tribal governments, federal agencies, municipalities, universities, community monitoring networks, and other response partners. A Southeast Alaska EGC Coordinating Group modeled loosely on Washington's structure could jointly establish priority monitoring areas, suppression thresholds, rapid-response protocols, data standards, funding needs, research priorities and annual work plans. Given that the major actors on this issue in Alaska have been Native Tribes, state policy could leverage this reality through establishing mechanisms for coordination with affected Tribes and provide Tribes with direct resources to undertake locally appropriate response actions. Similar actions have been taken in Idaho with the Nimiipuu Tribe and state officials co-managing salmon populations on the Snake River. This solution would be coordinated by ADF&G as outlined in the “Early Detection and

Rapid Response Plan for Invasive European Green Crab (*Carcinus maenus*) in Alaska, 2023-2028” (DeBruyckere et al, 2023). Furthermore, this solution allows Alaska to utilize new technological and scientific advancements in monitoring and early detection to improve our odds of success in eradication. These tools include eDNA, remote sensing, and drones as well as utilizing canine units to detect the presence of European green crabs based on their scent (Lodge et al, 2016; DeBruyckere et al, 2023; Sanchez, 2025). Targeted trapping should involve trappers removing intermediate sized EGC, as doing so helps prevent population overcompensation which can happen if all large adults are removed from the environment (Kerlin, 2021).

When invasive species diminish Tribes’ access to culturally important foods and habitats, they can constrain the Tribes’ ability to sustain traditional practices their communities have engaged in for generations. Effective EGC policy should recognize Tribal governments as essential partners in protecting food security, cultural resources, and allow the continued exercise of Indigenous stewardship. Alaska could establish a dedicated European Green Crab Early Detection and Rapid Response appropriation, with a substantial portion available directly to Tribal governments and locally led response organizations in affected and high-risk communities. Funding could support personnel, boats and fuel, traps and equipment, training, monitoring, eDNA, disposal, data management, public education, rapid-response deployment, and long-term suppression. Although there is existing funding for tribes to create environmental protection programs in their communities through Indian General Assistance Program (GAP) grant funding, there should be additional funding allocated to incentivize removal efforts by tribal organizations, local governments, community organizations, and non-profit organizations. This could be done in the form of state grants which organizations could apply for as has been done in Washington (Bush, 2024). For instance, Tribes and coastal communities detected and

responded to the threat; the state declared an emergency; the legislature provided sustained funding; Tribal governments became integral management partners; and a six-year plan institutionalized the response. Between January 2022 and August 2024 alone, that coordinated effort removed approximately 905,000 green crab from Washington waters (Susewind, 2024).

Additionally, given economic constraints, targeted trapping could be tested in some locations and not in others to measure the difference and effectiveness in the context of Alaska. This way, high-value marine estuaries that are key to the maintenance of species like salmon and Dungeness crabs are protected. This program would need to have clear benchmarks to guide progress and help stakeholders understand whether changes to the program are needed. Similarly, this program should increase funding and resources following El Nino years because the warmer water is more favorable to EGC larvae survival (Behrens Yamada et al, 2021).

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The highly invasive European green crab (EGC) has reached Alaskan shores and is spreading. According to current knowledge, larger EGC populations in Alaska are primarily localized to the communities of Metlakatla and Ketchikan, but this is likely an underestimate of their geographic spread. EGC carapaces have been found on Gravina Island, Prince of Wales Island, including Kasaan, and have been noted as far north as Etolin Island, just south of Wrangell.

EGC were first discovered in Southeast Alaska on Annette Island in 2022 by the Metlakatla Indian Community, who have since launched a trapping campaign to remove EGC from sensitive habitat. In the following four years, the numbers of EGC trapped have increased significantly. Between 2024 and 2025, the annual recorded number of crabs trapped went from 1,460 to 41,000. As of July 31st, 2026, Metlakatla Indian Community has caught 30,500 EGC as of August 26th, 2026. Last year Ketchikan had five live EGC and the number caught this year so far is 6,000. Further south, Haida Gwaii has caught around 2 million since 2020. These numbers do not account for areas where EGC are living undetected.

Background: EGC were brought to the east and west coasts of the United States in ballasts of large ships several centuries and decades ago respectively. Once relocated, they are disbursed significant distances on ocean currents in their larval state (Yamada et al, 2021). EGC compete for food and habitat and actively predate on native shellfish and crabs, especially juveniles. EGC's are shore crabs, generally drawn to shallower areas which is why they tend to target juvenile crabs of other species. They tolerate a wide range of temperatures and salinity levels, making it easy for them to compete with native crab species, including the commercially and recreationally important Dungeness crab. The protected bays and estuaries across the state of Alaska (Yamada et al, 2021; Fisheries and Oceans Canada, 2021) are particularly vulnerable to colonization. Despite adult Dungeness crabs being larger than EGCs, the latter's stronger pinching strength, harder shell, and more aggressive behavior makes it a formidable predator to the Dungeness crab population (NOAA 2025; Lutto, 2022). A single juvenile female EGC can hold 185,000 eggs and spawn up to twice per year (Fisheries and Oceans Canada, 2021). Additionally, EGC alter landscapes by excavating eelgrass beds in search of soft-shelled mussels and clams. These beds provide important habitat to juvenile salmon and other marine organisms. These excavations also contribute to coastal erosion (Drinkwin et al, 2019).

Current regulatory status in Alaska: Currently, EGC are listed as a Class A invasive species under ADF&G regulations. The import, possession, transport, sale, and consumption of Class A banned invasive species is illegal in Alaska. A second class for invasive species exists: Class B banned invasive species are invasive species

considered to have food value and are allowed to be transported for consumption as long as they are dead (ADF&G, n.d.).

The Ketchikan Indian Community submitted an emergency request on March 18, 2026 asking that ADF&G initiate an emergency rule to shift EGC from Class A to Class B in 5 AAC 41.075, which could potentially open EGC to sport fishing. They received a negative response from ADF&G Commissioner Doug Vincent-Lang on May 19, 2026. Similarly, on April 10, 2026 the Organized Village of Kasaan submitted two proposals to the Board of Fisheries. The first was under Administrative Order 360 to minimize the negative of regulations on Alaskans. The second proposal was submitted under the regulation proposal form for Kodiak Area Finfish. This letter accompanies an Agenda Change Request requesting that EGC be moved from Class A to Class B.

Other states' responses to EGC invasions:

Washington has declared a state-wide emergency on EGC and is working to quell population growth in the Salish Sea through targeted trapping and monitoring efforts. The state has partnered with tribes and non-government entities that have been vetted at the state level to limit the risk of bycatch and targeting of vulnerable, native species. These partners are paid through grant funding provided by the state government which currently allocates a total of \$12 million biennially with 3/4ths going to external trapping partners to address this problem (Bush, 2024). According to Raquel Crosier, the current incident commander for EGC with the Washington Department of Fish & Wildlife, intervention is exponentially more expensive once the population is established, making proactive policy the most effective and efficient tool at our disposal. Washington has been dealing with European green crab since the 1990s and only recently declared an emergency which means functional eradication in Washington is not feasible.

Oregon manages European green crab through allowing people to catch up to 35 daily with a recreational shellfish permit and allows commercial oyster farms to trap European green crab that target the oysters (Lindsey, 2026). The state is engaging in market research and development to create incentives for a green crab fishery in Oregon. While still in its early stages, the hope is to create market incentives for those in commercial fisheries to remove more green crab from marine ecosystems. (Chan, pers. comm. 2026).

In California, European green crabs fall under general regulations which allow members of the public to trap them year round, with a daily bag limit of 35 per person (California Department of Fish and Wildlife, 2026). Targeted trapping efforts have also been undertaken by non-state organizations like UC Davis. The state itself is in the process of

creating new regulations for EGC that treat the species as a nuisance to be eliminated rather than a fishery to be managed for sustained yield.

Considering that EGC have been present on the east coast of the United States for roughly two centuries, the strategies used here are more concerned with diminishing overall population instead of stopping the spread. With this in mind, most east coast states allow members of the public to catch EGC, with varying state requirements to do so. In response to an increased impact on the lobster fishery, organizations like New Hampshire Sea Grant are currently working to encourage members of the public to utilize these crabs either by eating them or creating value-added products like pet food or even alcohol (Sea Grant Law Center, 2025).

Additional responses to EGC invasion

In advance of those discussions, and with the understanding that simple change requested in the ACR would not be sufficient to mitigate the negative effects of the EGC invasion, we would like to present some additional options and considerations.

Other policy options at the state's disposal are:

- A bounty system, such as the one for the Northern Pikeminnow in Idaho, Washington, and Oregon where people can turn them in for \$6-10 each. These programs tend to be expensive, but create an incentive for members of the public to get involved and engage in monitoring and targeted removal.
- Market incentives to use green crab in commercial products, such as the Chesapeake Bay blue catfish pilot program which has utilized public information and marketing techniques to remove stigma around eating Blue catfish.
- Opening new fisheries, such as Maryland's regulations allowing charter and commercial vessels to fish for and sell Blue catfish to consumers (Petrowich, 2026). Similarly, New Brunswick in Canada has launched a pilot commercial fishing industry to encourage catching and utilizing EGC, which could be easily done in Alaska through utilizing existing processor infrastructure.
- Education and public information outreach to raise awareness of the issue and proper monitoring and trapping techniques could help intensify the positive effects of other policy solutions by ensuring the public understands best practices while minimizing negative effects like bycatch and unintended environmental damage. This could be accomplished in Alaska through the existing university infrastructure and upscaling existing workshops like those done by Barbara Morgan at the University of Alaska in Ketchikan.
- Targeted trapping efforts like in Washington, which funds trapping and monitoring efforts of partnering organizations like nonprofits, tribes, and community

organizations by the state and federal government. Though it requires a higher upfront cost, it incentivizes local organizations near marine environments vulnerable to EGC infestation to take action and be proactive about trapping and removing EGC with minimal bycatch risks.

- Holding derby competitions to encourage members of the public to go out and catch European green crab.

These solutions can be implemented individually or in combination with one another.

More information and case studies on these and other responses to marine invasives can be found in a United Nations Food and Agriculture Organization's "Fisheries Responses to Invasive Species in a Changing Climate" publication found here: <https://doi.org/10.4060/cd1400en>

Conclusion:

According to a presidential memorandum from May 9, 2025, the President of the United States, as well as a majority of the U.S. Congress, authorized funding to implement deterrent technology and infrastructure to prevent the spread of invasive Asian carp in the Great Lakes. This national recognition showcases the importance and urgency of invasive species issues. Alaska is in the unique position to take action against European green crab before the population explodes and functional eradication is infeasible. Additionally, the state government can learn from the mistakes and decisions made by states on the East and West coasts of the U.S. regarding this issue and can respond in a better way that protects the environment, native marine species, and fisheries of all kinds.

Significant work has already been done to educate the public about European green crab, monitor for their presence on Alaskan beaches, eliminate populations that have already been found, and prepare the rest of the state for future invasion. The current proposal to reclassify European green crab is just a first step. The Board of Fisheries should continue to engage with this issue, and create regulations as this issue progresses, so as to best manage this situation. Doing so now rather than after the EGC spread further into Alaskan waters gives us the best chance to minimize the impact of this highly detrimental invasive species.

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October 13, 2026

TO: Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Opposition to Acceptance of ACR 3

To the chair and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) conducts salmon enhancement, research, and monitoring activities for the Kodiak Management Area. Our programs serve all salmon user groups with projects aimed at benefiting Subsistence, Sport, and Commercial salmon fisheries in our region. We can achieve this through revenues generated through Salmon Enhancement Tax, a self-imposed tax paid solely by commercial fishermen on ex-vessel value of salmon landings in Kodiak, and through cost recovery revenue derived through the licensing of harvest in designated Special Harvest Areas for returning hatchery-produced salmon, primarily pink salmon.

We encourage the Board not to accept ACR 3. The ACR does not meet criteria for acceptance and would be devastating to the salmon users and communities across coastal Alaska from Ketchikan to Kodiak.

Briefly, ACR 3

- (A) Does not address a conservation purpose or reason—ACR 3 points to the poor 2026 return of pink salmon in Prince William Sound and other locations but ignores the fact that, in Kodiak, where the Kitoi Bay Hatchery Facility collects 215 million pink salmon eggs each year, pink salmon returns exceeded the mid-point forecast for both wild and hatchery returns. Other regions, such as Southeast Alaska, met overall goals but saw wide variability between districts. These are indications of natural variability and/or localized conditions rather than a conservation issue.
- (B) Does not correct an error in regulation—quite simply, there is no regulation to correct. By statute, hatchery permits are issued by the Commissioner of ADF&G and are not set in or detailed by regulations.
- (C) Does not correct an unforeseen effect on a fishery when a regulation was adopted—the framers of the statutes and regulations that govern hatchery operations did anticipate the role and impact of hatcheries on the fisheries in the regions in which they operate and on a broader scale. This proposal relies on speculation and not actual effect. Hatchery operators have provided significant numbers of scientific articles as well as a synthesis of available information related to ocean carrying capacity and competition at sea in previous Board of Fisheries meetings. Information on this topic has been presented and expanded upon at publicly-noticed meetings multiple times

over several years. Given that this issue, in some form, has been before the Board on many occasions, that 2026 returns, though poor in some areas, were not unprecedented and are within the bounds of previously observed variability, and the circumstances described in the proposal have been almost continuously covered by the Board and the public from the period of 2019 through this year, there is no reason to accept this ACR on these or any other grounds.

Beyond failing to meet the criteria necessary for acceptance, the proposed action in ACR 3 is such a radical reduction to permitted hatchery capacity across the state that implementation would bankrupt the associations and require shuttering of all PNP hatchery facilities. The proposal, as written, makes no distinction between species, regions, or facilities and would reduce total output to less than that of a single facility in one location for all of Coastal Alaska. To attempt this action at all would likely exceed the Board's authority and is neither practical nor practicable. To entertain this notion with any seriousness, other than to than to summarily reject it, would be a performance, not a process.

Thank you for your time and consideration of these comments.

Sincerely,



Tina Fairbanks
Executive Director



October 12, 2026

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: Opposition to ACR 13 — Statewide Chinook Salmon Retention

Chair Carlson-Van Dort and Members of the Board,

The Kodiak Seiners Association (KSA) opposes ACR 13, which would require commercial fishermen statewide to retain all Chinook salmon caught and report their disposition. While we support accurate harvest accounting, we are concerned that this proposal would undermine existing conservation measures, particularly those protecting the Karluk and Ayakulik Chinook salmon runs.

Under 5 AAC 18.395, Kodiak seiners are required to release Chinook salmon 28 inches or greater during certain fishing periods. Additional nonretention requirements can be implemented when Karluk and Ayakulik Chinook escapement goals are unlikely to be met. These regulations were put in place for a reason: to give Chinook salmon an opportunity to survive and return to their spawning grounds while allowing fishermen to harvest more abundant salmon species.

Not every released Chinook survives, but requiring fishermen to retain every fish guarantees those fish will not contribute to escapement. For stocks like Karluk and Ayakulik, which have struggled to meet escapement goals, eliminating this conservation tool makes little sense without evidence that mandatory retention would produce a better outcome.

We also do not believe ACR 13 meets the Board's criteria for an agenda change request under 5 AAC 39.999. The proposal does not demonstrate a conservation benefit, identify a regulatory error, or address an unforeseen consequence of an existing regulation. Regional differences in Chinook retention requirements are intentional and reflect the unique management needs of individual fisheries. They are not errors that need correcting.

If the goal is better Chinook accounting, we support exploring improvements to reporting requirements. However, those discussions belong in the regular Board process, with input from ADF&G and affected fishermen, and should not come at the expense of existing conservation measures.

Kodiak's seine fleet understands the importance of rebuilding our Chinook runs. Our fishermen have operated under restrictions to protect these stocks, and we believe ADF&G should retain the flexibility to use the management tools best suited to each fishery.

KSA respectfully requests that the Board reject ACR 13.

Respectfully,

Darren Platt
President
Kodiak Seiners Association

Astrid Rose
Executive Director
Kodiak Seiners Association



October 12, 2026

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: Opposition to ACR 3 – Reduce Statewide Private Nonprofit Salmon Hatchery egg-take capacity to less than 100 million eggs annually

Chair Carlson-Van Dort and Members of the Board,

The Kodiak Seiners Association (KSA) **opposes ACR 3** because it fails to satisfy the 3 ACR requirements as outlined in 5 AAC 39.999.

A) for a fishery conservation purpose or reason;

The proposal seems to indicate that statewide pink escapements are low, despite the fact that many areas within the state are exhibiting strong returns of wild pink stocks. For example, the Kodiak management area has consistently met or exceeded escapement goals while providing ample harvest opportunity in most of our districts for many consecutive years now, despite the fact that we have a hatchery program releasing pink salmon and small number of chum salmon fry every year. In fact, 2025 was the 2nd largest ever pink salmon return to Kodiak. It has been repeatedly demonstrated that there is no correlation between hatchery egg-take levels and wild salmon returns to the Gulf of Alaska

B) Correct an error in regulation

The proposal does not reference any regulatory error.

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

Again, no such regulation is referenced or referred to in the proposal.

KSA respectfully requests that the Board reject ACR 3.

Respectfully,

Darren Platt
President
Kodiak Seiners Association

Astrid Rose
Executive Director
Kodiak Seiners Association



KUSKOKWIM RIVER

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October 9, 2026

Märit Carlson-van Dort
Chair, Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: October 2026 Work Session – Comments on ACRs

Dear Chair Carlson-van Dort and members of the Board,

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) provides the following comments on Agenda Change Requests (ACRs) submitted for the October 2026 Work Session. **Specifically, KRITFC supports ACRs 6, 7, 8, 9, 10, 11, and 13, and asks the Board of Fisheries (Board) to approve them for the 2026-2027 meeting cycle.**

KRITFC works to support the federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring. Our 28 Tribal Commissioners, 7-member Executive Council, and 5 In-Season Managers rely on both our Alaska Native values and knowledge as well as the best available Western science to co-manage, protect, and restore Kuskokwim salmon.

In February 2026, the Board approved changes to the June and Post-June Salmon Management Plans for the South Alaska Peninsula (Area M) fisheries by passing Proposal 127 (amended as RC245) to decreasing fishing time in June; Proposal 141 to enforce king salmon caps in the post-June fishery; and Proposals 147 and 148 to shorten drift gillnet and seine gear. These changes were critically important steps to protect severely declined Chinook and chum salmon stocks from the Kuskokwim and other rivers in Western and Interior Alaska that migrate through this fishery.

However, in May 2026, the State of Alaska Acting Attorney General took unprecedented and seemingly collusive action to disapprove these Board actions. This meant the Area M fishery operated under the 2023-2025 management plans, entrusting the fishing industry with internal adaptive management programs and risking the conservation of migratory Western Alaska stocks. Meanwhile, the voided Proposal 127 would have reduced fishing time across all gear types in the month of June by 27% — a time when nearly one-quarter of all chum salmon

TELIDA | NIKOLAI | TAKOTNA | MCGRATH | LIME VILLAGE | STONY RIVER | SLEETMUTE | RED DEVIL
GEORGETOWN | CROOKED CREEK | NAPAIMUTE | CHUATHBALUK | ANIAK | UPPER KALSKAG | LOWER KALSKAG | TULUKSAK
AKIAK | AKIACHAK | KWETHLUK | BETHEL | OSCARVILLE | NAPASKIAK | NAPAKIAK | KASIGLUK | ATMAUTLUAK
NUNAPITCHUK | TUNTUTULIAK | EEK | QUINHAGAK | KONGIGANAK | KWIGILLINGOK | KIPNUK | CHEFORNAK

catches come from Western and Interior Alaska stocks, according to recent genetic studies conducted by the Alaska Department of Fish & Game (ADFG).¹

Kuskokwim River salmon stocks remain depressed in 2026:

- **Chinook:** The end-of-season Chinook salmon count at the Kuskokwim sonar project was 95,933 fish², 23% below the 2018-2025 average³ (124,146 fish). The preliminary total run size is estimated at 117,811 Chinook salmon, well below the historic average.⁴ Harvesters reported that Chinook salmon conditions were healthy with larger body-sizes, but that the run was late, slow, and low.
- **Chum:** Kuskokwim chum salmon had a hopeful resurgence, with an end-of-season count at the sonar of 558,149 fish — nearly 50% above the 2018-2025 average of 226,488 fish — and harvesters reporting good-sized and healthy fish. However, because one year of higher abundance does not constitute a trend, and historic chum salmon returns were larger than the 2026 runs, chum salmon are still in a state of recovery.
- **Sockeye:** Sockeye salmon counts at the Kuskokwim sonar project were the lowest on the project's record, with 498,415 fish counted, 35% below the 2018-2025 average of 757,140 fish. Harvesters reported strong sockeye harvests despite lower abundance. However, because of fishing closures in place for Chinook and chum salmon, harvests for sockeye salmon were restricted.
- **Coho:** Like Chinook salmon, coho salmon similarly returned late and in low numbers; the sonar project counted 164,454 coho by the end of operations (August 26), 41% below the 2020-2023 + 2025⁵ average of 268,063 fish. The return of coho salmon in 2026 tracked returns from 2022, which were the lowest on record.

In response to poor Chinook and coho salmon returns, and to protect recovering chum salmon, subsistence users were once again asked to sacrifice their harvests and bear the burden of conservation for these species. The lower Kuskokwim River were generally closed by USFWS and KRITFC to gillnet fishing between June 1–July 13 (during the Chinook and early chum salmon runs) and August 7–September 15 (during the coho salmon run; state and federal announcements), as well as to Chinook salmon harvests in spawning tributaries June 1–July 31. ADFG closed the middle and upper Kuskokwim to gillnets June 1–11 (during the early Chinook salmon run) and in sections between August 21–September 4 (during the coho salmon run), as well as to Chinook salmon harvests in the Aniak River throughout the entire season.

After directed mainstem subsistence fishing opportunities in federal waters of the Kuskokwim River, KRITFC produces in-season harvest estimates for the lower river (between Tuntutuliak and Tuluksak). While not representative of subsistence harvest across the drainage, which is

¹ Dann et al., 2025, "[Genetic stock composition of chum salmon harvested in commercial fisheries of the South Alaska Peninsula, 2022-2024](#)," ADFG FDS No. 25-63, Table 29. For Chinook salmon genetic analyses, see Dann et al., 2026, "[Preliminary genetic stock composition of Chinook salmon harvested in commercial salmon fisheries of the South Alaska Peninsula and Chignik, 2024-2025](#)," RIR No. 5J26-02.

² Personal communication with S. Larson, ADFG, August 25, 2026.

³ AYK Database Management System, ADFG, pulled September 14, 2026.

⁴ See [ADFG Three-System Index letter](#) dated September 15, 2026.

⁵ Sonar operations in 2024 ceased early – on July 25 – before the coho salmon run peaked. 2024 counts are left out of this average calculation to not bias the average low.

recorded by ADFG’s river-wide post-season harvest survey program, these harvest estimates can provide an in-season benchmark for comparison to Amounts Necessary for Subsistence (ANS).⁶ Data from these in-season harvest estimates indicate subsistence harvests remain below fishers’ needs:

- **Chinook:** We estimate 22,800 Chinook salmon were harvested, or 75% below the median of the Chinook salmon ANS range (67,200–109,800 fish).
- **Chum:** The in-season harvest estimate of 29,100 chum salmon at 63% below the median of the chum salmon ANS range (41,200–116,400 fish).
- **Sockeye:** KRITFC’s in-season harvest estimate of 27,400 sockeye salmon represents a harvest 41% below the median of the sockeye salmon ANS range (32,200–58,700 fish).
- **Coho:** There is no in-season harvest estimate for coho salmon due to fishing closures instated by USFWS early in the coho salmon run, and the subsequent conclusion of the harvest estimation program before closures lifted.

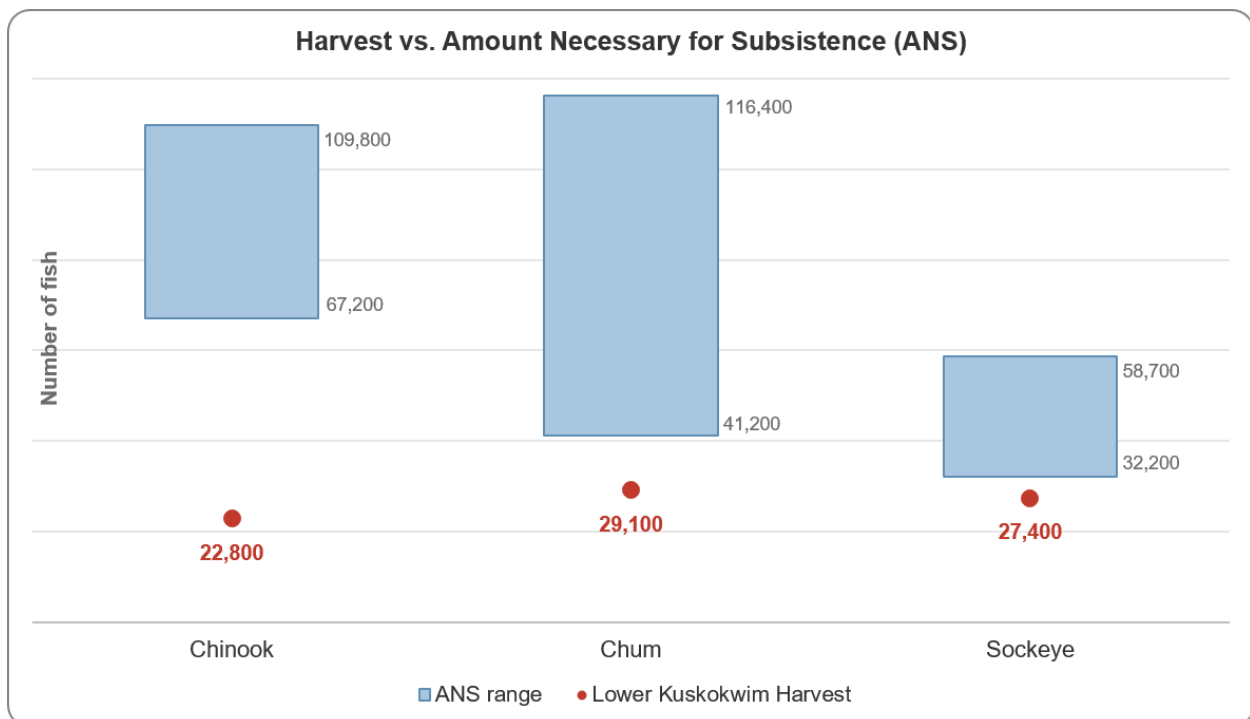


Figure 1. Estimated lower Kuskokwim River Chinook, chum, and sockeye harvests, 2026, compared to drainage-wide ANS ranges.

In summary, the Kuskokwim River region continues to experience multi-species run failures with dire consequences to food security and health, cultural heritage, and ecological biodiversity.

⁶ During 2016–2025, the lower river in-season harvest estimates represented an annual average of 76% of Chinook salmon, 55% of chum salmon, and 45% of sockeye salmon drainage-wide harvests estimated by the ADF&G post-season household survey program. The in-season harvest estimates are not meant to serve as a proxy, but rather as a benchmark for preliminary comparison.

And yet: The Area M salmon fishery reported end-of-season (August 27, 2026) harvests of 4,500 Chinook salmon and 762,000 chum salmon (486,000 of which were reportedly caught by the end of the June fishery). **If recent genetic stock composition estimates provided by ADFG hold this season, these 2026 harvests indicate at least 116,600 chum salmon from the June fishery and 250 Chinook salmon from the entire fishery could have originated in Western and Interior Alaska rivers.** Instead of given the opportunity to return to rivers to meet escapement goals and provide for customary and traditional subsistence use, however, these fish were harvested and sold for commercial use. The loss of these fish is a risk to the sustained yield of Kuskokwim and other Western and Interior Alaska fisheries, a violation of the subsistence priority (AS 16.05.258), and a threat to the continuation of our culture and way of life.

As stated in our letter to the Board in February 2026 (attached), **Kuskokwim River families can no longer carry the burden of conserving and sustaining salmon and our way of life on our own.** KRITFC thus urges the Board to approve the following ACRs for its 2026-2027 meeting cycle. **We support these ACRs in line with the rationale provided by the submitters:**

- **ACR 6**, to reduce Area M fishing time in the month of June.
- **ACR 7**, to reduce Area M fishing time in the month of June.
- **ACR 8**, to enforce Chinook salmon caps in the post-June fishery, with subsequent reductions in commercial fishing time if met.
- **ACR 9**, to reduce maximum depth of Area M gillnets.
- **ACR 10**, to reduce maximum depth and length of Area M seine nets.
- **ACR 11**, to require retention of Chinook salmon caught in Area M seine gear.
- **ACR 13**, to create a standardized statewide retention and reporting requirement for Chinook salmon harvests in commercial fisheries.

Respectfully submitted,



Kevin Whitworth
Executive Director

Attachment 1: February 3, 2026, letter to the Board of Fisheries in advance of the Alaska Peninsula / Aleutian Islands / Chignik Finfish Meeting
Attachment 2: 2025 Kuskokwim River End-of-Season Summary



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February 3, 2026

Märit Carlson-van Dort, Chair
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: Comment on Alaska Peninsula / Aleutian Islands / Chignik Finfish Meeting, 2026

Dear Chair Carlson-van Dort and members of the Alaska Board of Fisheries:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) is an inter-Tribal organization that supports the interests of the 33 federally recognized Tribes of the Kuskokwim River watershed in fisheries management, monitoring, and research. Our Tribes are guided by our Alaska Native values and knowledge and the best available Western science as we strive to steward and conserve Kuskokwim salmon.

KRITFC provides the following comments in advance of the Board's Alaska Peninsula / Aleutian Islands / Chignik Finfish meeting. This area is largely referred to as "Area M," and we will refer to it as such in this comment.

I. Catastrophic Western Alaska Chinook & Chum Salmon Declines

Kuskokwim River Chinook, chum, and coho salmon stocks are steeply declined. Details about the status of these stocks can be found in KRITFC's 2025 End-of-Season Summary¹ (Attachment 1; Figures 1 and 2). Because of stock declines, commercial fisheries on the Kuskokwim River have been closed for years, and subsistence fisheries have been heavily restricted for over a decade.

The situation our relatives and neighbors on the Yukon River face is even worse:

- No directed **Chinook or summer chum** salmon subsistence gillnet harvest opportunities on the Yukon River for the past five years: 2021–2025 (Figure 3).
- No directed **Chinook or summer chum** salmon subsistence gillnet harvest opportunities for mainstem Yukon River communities for the past six years: 2020–2025.

¹ Also available at https://www.kuskosalmon.org/s/11072025_EOS_FINAL.pdf.

Attachment 1

- Despite no directed Chinook salmon subsistence harvest opportunities, run abundance has **failed to meet the treaty-based Canadian border passage** Chinook salmon goal for the past six consecutive years (Figure 4).
- **Food security** is highly vulnerable and threatened due to the loss of this important part of the subsistence diet in a region that is highly dependent on subsistence for nutrition and survival.

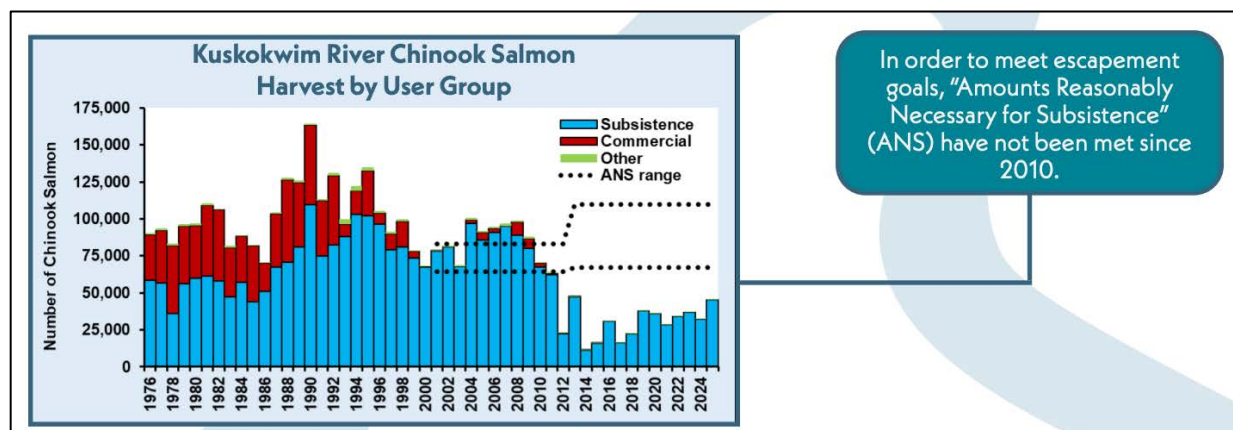


Figure 1. Kuskokwim River Chinook salmon harvest by user group, 1976-2025. The preliminary 2025 subsistence harvest was a 57% decline from the average for 1976-2010. Graphic from 2025 Kuskokwim River End-of-Season Summary.

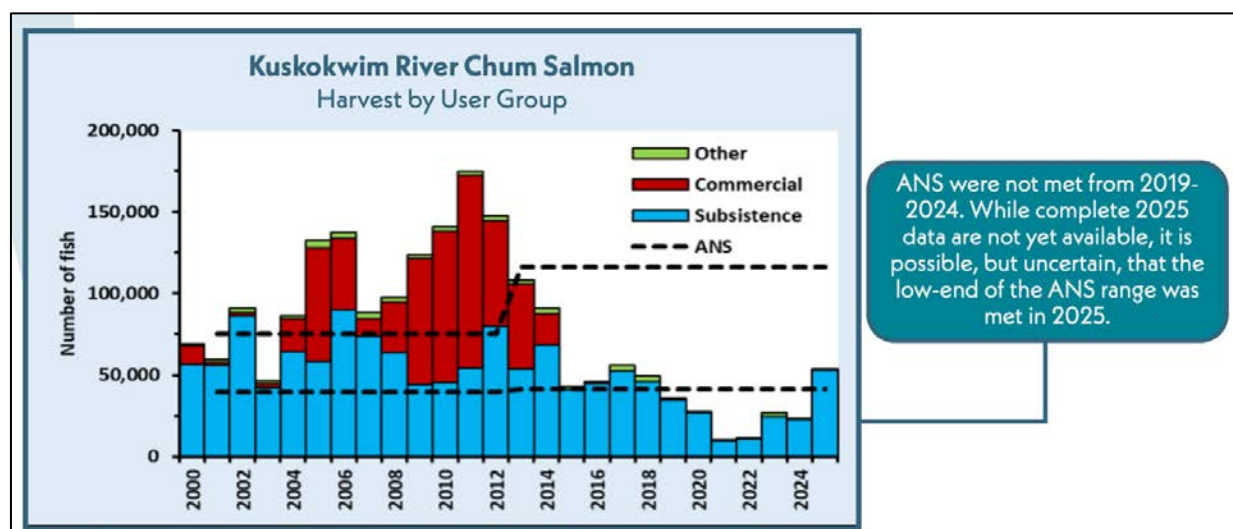


Figure 2. Kuskokwim River chum salmon harvest by user group, 2000-2025. Due to the ongoing severe chum salmon crash and the need for conservation, the average subsistence harvest during 2020-2024 was 68% less than the 2000-2018 average. 2025 chum salmon harvest estimates are preliminary projections based on in-season and historical harvest data. Graphic from 2025 Kuskokwim River End-of-Season Summary.

Attachment 1

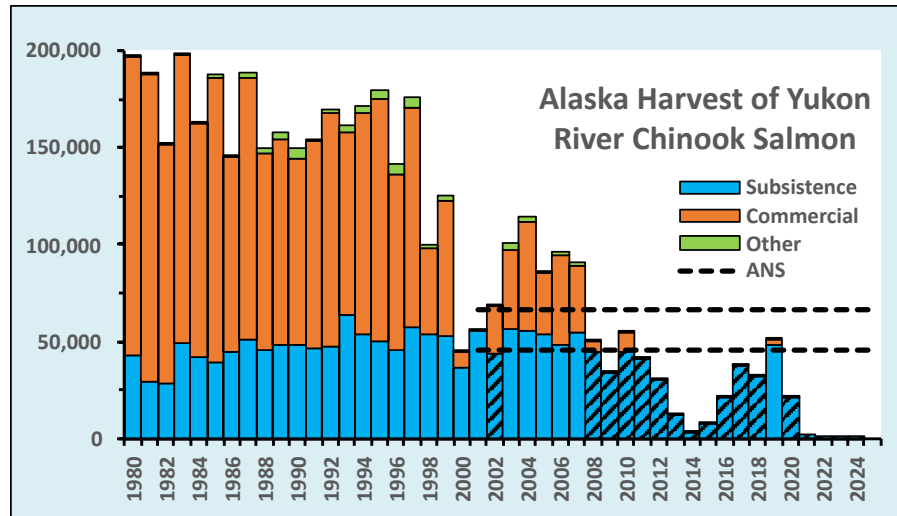


Figure 3. Yukon River Chinook salmon harvest by user groups during 1980—2025, showing that long-term subsistence harvest needs in the watershed were only met once since 2008. Subsistence harvest needs are based on ANS as determined by the Alaska Board of Fisheries in 2001. Subsistence harvests not meeting ANS for Chinook salmon are shown with dashed bars. Source: JTC 2025; Jallen et al. 2025.

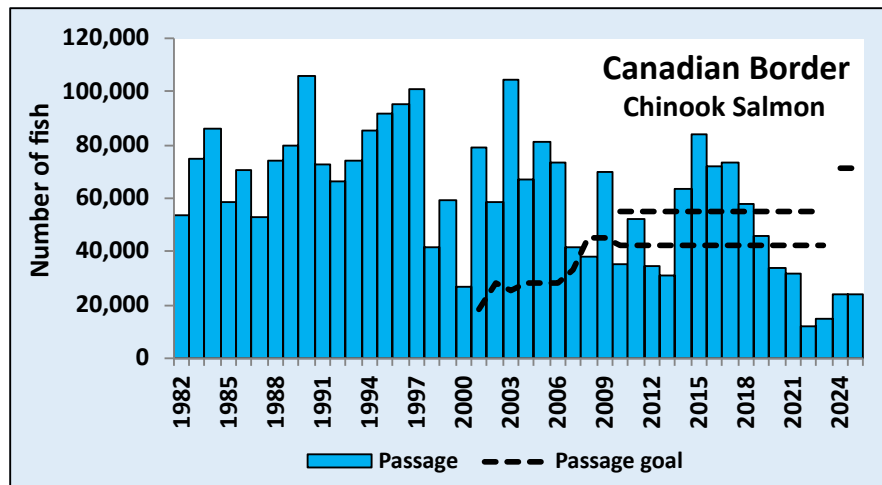


Figure 4. Chinook salmon passage at the Canadian border, 1982-2025. Source: JTC 2025; Jallen et al. 2025.

These catastrophic declines of Western Alaska salmon have caused interrelated, devastating, and existential negative impacts to Kuskokwim and Yukon communities' food security, physical and mental health and wellbeing, economic opportunity, and cultural enrichment and preservation.

KRITFC is aware that multiple threats are cumulatively causing driving Western Alaska chum and Chinook salmon declines, including climate change and marine commercial harvest.

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However, we know impacts from marine commercial harvest are the factors over which we have near-term controls, including through and by this Board.

II. Failure of the Alaska Department of Fish & Game to Provide Transparent Information in Reasonable Timeframes

KRITFC notes that the Alaska Department of Fish & Game (ADF&G) has not yet provided critical information relevant to the Board’s deliberations in February.

This includes the results of the **2024 and 2025 South Alaska Peninsula Chinook salmon genetic stock identification**. On September 16, 2025, KRITFC and our partner organizations, the Association of Village Council Presidents and Yukon River Inter-Tribal Fish Commission, requested this information from the ADF&G Commissioner. On December 11, 2025, a group of rural legislators sent a request for the same information to the Commissioner. A summary of this study was promised by the third week of January—but that time has come and gone, with no information publicly shared.

When KRITFC asked for this data nearly 5 months ago, we expected that ADF&G would prioritize this genetic stock information in light of the facts that (1) Area M is the largest unrestricted Chinook salmon fishery in Alaska, (2) the only study of Chinook salmon genetics of this fishery’s harvest was conducted a dozen years ago, and (3) Chinook salmon stocks across Alaska, Canada, and the Pacific Northwest are all in steep decline, with many fisheries severely restricted.

The lack of this information before the public comment deadline on February 3, before dozens of Advisory Committee meetings leading up to this Board meeting, and within mere weeks of the Board’s meeting poses a serious failure to provide transparent, relevant science in reasonable timeframes for public and decision-maker deliberations. KRITFC finds this failure of ADF&G to provide timely information negligent, leaving stakeholders in the dark about the natal origins of over 200,000 Chinook salmon caught by Area M fishers since the last genetic sampling study.

III. Systematic Failure of the State of Alaska to Ensure Sustained Yield / Sustainable Salmon Management of Declined Alaska Salmon Populations

The State of Alaska allocative priorities in statute and Board policy are very clear: **The first and highest priority of sustainable salmon management is escapement, then subsistence harvest opportunity, followed by other uses.**

- The Policy for the Management of Mixed Stock Salmon Fisheries, 5 AAC 39.220(a), prioritizes “conservation of wild salmon stocks consistent with sustained yield” and states that salmon resource allocation “be consistent with the subsistence preference in AS 16.05.258.”
- Alaska Statute 16.05.258(b)(4)(A) specifies that if the harvestable portion of the stock or population is not sufficient to provide a reasonable opportunity for subsistence uses, **the Board shall “adopt regulations eliminating consumptive uses, other than subsistence uses.”**

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While these policies should govern state salmon management, in practice over the past twenty years, the **ADF&G and the Board of Fisheries have knowingly taken action to prioritize Area M commercial harvest above escapement and subsistence uses.**

ADF&G's own Area M genetic stock identification data documents their failure to uphold their sustained yield commitment and prioritize escapement over subsistence.

- **Between 2000 and 2025, the Area M June fishery harvested and sold nearly 5 million chum salmon bound for Western Alaska Rivers.**
- **During the past six years of severe chum salmon run failures in the Yukon and Kuskokwim (2020-2025), the Area M June fishery caught and sold a minimum estimate of 741,000 chum salmon bound for Western Alaska Rivers.**
- As shown in Figure 5 below, regardless of whether escapement goals or ANS are being met in Western Alaska, **commercial harvest in Area M remains the priority for ADF&G and this Board.**

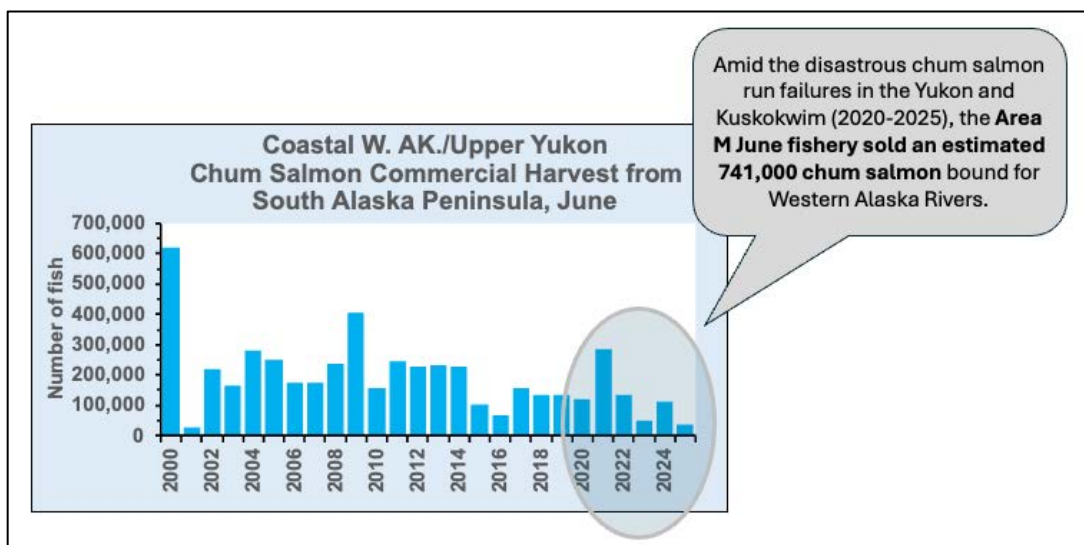


Figure 5. Estimated harvest of Coastal Western Alaska / Upper Yukon chum salmon (collectively, Western Alaska chum) in the June Area M fishery, 2000-2025. Data is based on stock proportions from several ADF&G genetic stock identification projects. Sources: Estimate of the cumulative harvest for 2000-2015 based on Munro et al. (2012). Estimate of the cumulative harvest for 2016-2025, Dann et al. (2025).

By allowing unlimited amounts of commercial chum salmon harvest in the Southern Area M fishery while Kuskokwim and Yukon chum and Chinook salmon stocks are not meeting escapement goals or food security (ANS), **the Board of Fisheries and Alaska Department of Fish & Game uphold a pattern and practice of violating their own statutes and policies, enshrined in the State of Alaska's code, regulations, and constitution.**

After years of closures to commercial, sport, and personal use of Chinook and chum salmon fisheries, and sharply restricted subsistence fisheries, it is obvious that the burden of conservation is not being shared among all harvesters. **It is critical that this Board act to significantly reduce Area M commercial harvest of chum and Chinook salmon stocks essential for higher priority sustainable escapements and subsistence uses in Western Alaska rivers.**

IV. Area M: The Last Unrestricted Chinook Fishery in Alaska & the Pacific Coast

Not only are these fish intercepted by Area M, but Area M commercial fishermen profit from their sale. **In fact, the Area M commercial fishery is the only remaining unrestricted Chinook salmon fishery—commercial or otherwise—in the state of Alaska. Few of the Chinook salmon harvested for profit by Area M fishermen are from spawning populations in Area M,** per genetic findings by the Alaska Department of Fish & Game (ADFG) in 2014.²

The cumulative commercial removals of Chinook and chum salmon in the Area M fishery are staggering. **Over the past sixteen years alone, Area M was allowed to catch and sell over 200,000 Chinook salmon, and since 2000, harvests reach nearly 300,000 Chinook salmon (Figure 6).** These fish are caught in both the June and post-June fishery, though harvest ticket information tells that the weight of Chinook salmon caught in the June commercial fisheries of the South Alaska Peninsula from 2010–2025 were, on average, 67% larger than those caught in post-June (A. Nelson, ADF&G, per. Com. 1/30/26). **This indicates that Chinook salmon caught in the June fishery may be mature adults migrating to their spawning grounds.**

Prior to 2024, ADF&G conducted only one year of genetic sampling (2014) to identify the stock of origin Chinook salmon harvested in Area M. The results show that Area M sells Chinook salmon from populations spawning from the West Coast to the Yukon River. This most recently available genetic analyses show that approximately **20% of all Chinook salmon**³ caught in the yearly Area M fishery are from Western Alaska (Coastal Western Alaska + Upper/Middle Yukon stocks). Additional, more recent chum salmon genetic studies show that approximately **24.6% of chum salmon**⁴ harvested in the Area M June fishery are from Western Alaska.

Because there is no independent monitoring of Area M harvests and very limited enforcement presence, **we have no confidence that ADF&G is receiving accurate, reliable reports of how many fish are actually retained and sold in this fishery.** Therefore, we must consider these Area M harvest statistics to be an absolute minimum number of fish removals for both Chinook and chum salmon.

² See Shedd et al. 2016, Appendix B; available at <https://www.adfg.alaska.gov/FedAidPDFs/FMS16-11.pdf>.

³ See Shedd et al. 2016, Appendix B; available at <https://www.adfg.alaska.gov/FedAidPDFs/FMS16-11.pdf>.

⁴ See Dann et al. 2025. Available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/akpen/FDS25-63.pdf>.

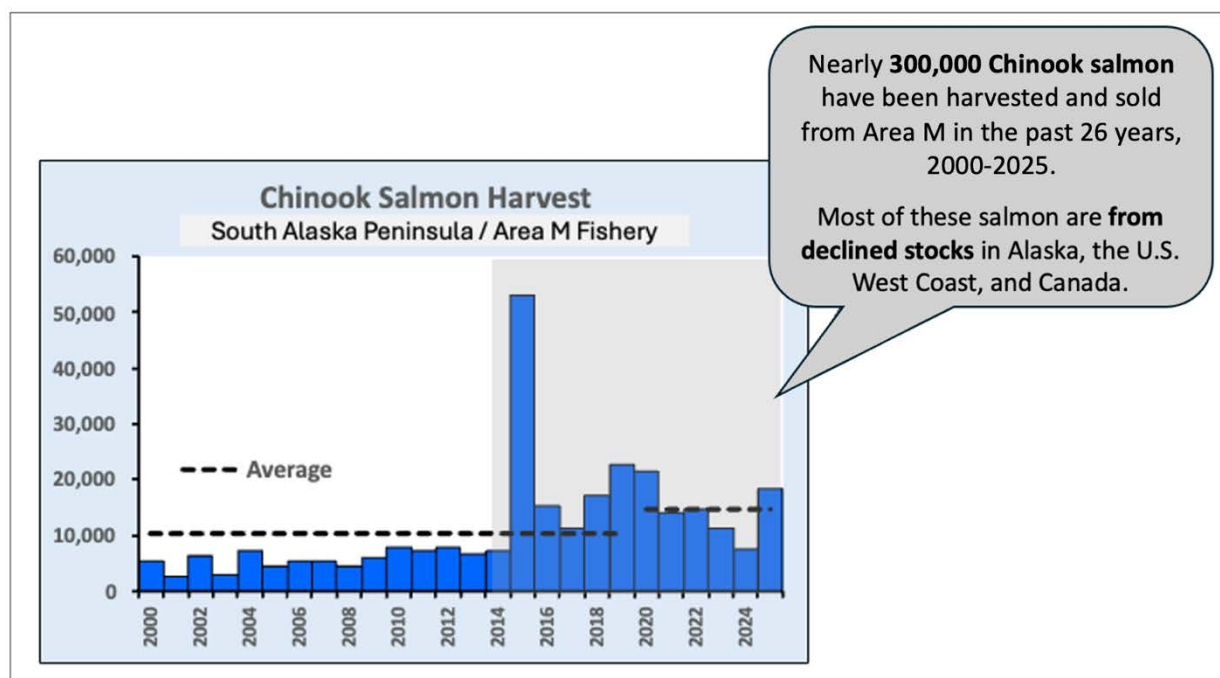


Figure 6. Annual catch of Chinook salmon in Area M fisheries, 2000–2025. Source: Keyse et al. 2025 draft; M. Keyse, ADF&G, pers. com.

V. Salmon Conservation Through Managing Time and Gear

Critically, the 2026 Board of Fish Proposals to significantly reduce Area M harvest of declined Chinook and chum populations are not intended to address allocative issues between regions. At this meeting, we are urging the Board to take action to **prioritize escapement and subsistence harvest over commercial harvest.** Per statutory obligations such as in the State’s subsistence priority and the mixed stock fisheries policy, the Board should act to protect Western Alaska chum and Chinook salmon stocks passing through Area M as a migratory corridor.

The Board has several options to improve protection of Western Alaska Chinook and chum salmon. The two most effective options are:

- **Time:** Institute meaningful closures that reduce fishing impact on Western Alaska salmon stocks.
- **Gear:** Reduce gear sizes to minimize impacts to Western Alaska salmon stocks.

A third option is to limit fishing area. There are consistent patterns of where both Chinook and chum salmon are harvested in Area M. However, ADF&G did not make the necessary detailed harvest data available by statistical area in time for proposal submissions in 2025, nor for this comment, despite early requests for it. KRITFC’s comments thus focus on proposals based on managing time and gear.

Managing Fishery Time: One primary way to lessen the impact of the Area M fishery on Western Alaska salmon is to reduce the amount of time nets are in the water. This is a tactic used by fishery managers everywhere, including in the Kuskokwim, where state, federal, and Tribal

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managers apply rolling closure windows in downstream areas to allow salmon to migrate to escapement grounds and other uses upstream.

ADF&G (Eggers et al. 1989) found that it takes an individual chum salmon roughly 4.6 days (110 hours) to move from the Shumagin Islands to Unimak district. This study tells us two things:

1. **This fish passage timing has been known for decades**, yet management has promulgated the Area M fishery while Western Alaska stocks striving to pass through this fishery have dramatically declined. This appears to be a violation of state statutes to provide for escapement and subsistence fishing above all other uses (including commercial fisheries).
2. It would take additional time for a chum salmon to cross through the Alaska Peninsula and into the Bering Sea. We can assume it takes at least 5 days for a single chum salmon to safely pass through the Area M management area and into the Bering Sea. In other words, **Area M fishing closures fewer than 5 days have little conservation benefit for chum salmon because only a small component of the passing fish will traverse the entire management area.**

The current Area M June fishing schedule, in effect since 2023, provides some—though minimal—conservation benefit for Western Alaska salmon *when compared to a totally unrestricted June fishery*. **However, the current closure windows in Area M during the June fishery are only around 32–76 hours (1.3–3 days) for the seine fleet and 32 hours (1.3 days) for drift and set net vessels.** According to ADF&G's data, these closure periods are insufficient for migrating salmon to pass through this fishery.

The Area M June fishing schedule should be strengthened with additional days of closures across June, and particularly in the middle of June when, according to fish ticket information, peak chum salmon passage occurs. Additionally, fish ticket and genetic data tell us that juvenile Western Alaska Chinook salmon mill in the Area M fishing grounds throughout June and July. Any closures intended to reduce harm to migratory Western Alaska chum salmon will thus also reduce harm to rearing Western Alaska Chinook salmon.

For this reason, **KRITFC supports the following proposals, which seek additional closures to Area M June commercial fishery management plans:**

- **Proposal 136**, which calls for a complete closure of all gear from June 7-28.
- **Proposal 131**, which calls for a closure to the seine and drift net fishery from June 12-23.
- **Proposal 127**, which calls for a 10-day consecutive closure to the seine and drift net fishery between June 12-23.

Additionally, KRITFC opposes the following proposals, which seek additional extensions to the Area M June commercial fishery:

- **Proposal 134**, which increases fishing time in June for the seine fleet.
- **Proposal 135**, which allows for live release of Chinook salmon but does not reduce encounter rates or fishing effort.
- **Proposals 137 and 138**, which extends the June set net fishery.

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- **Proposals 139 and 146**, which extends the July set net fishery.

Managing Fishery Gear: A second way in which this Board can reduce the impacts of the Area M fishery on Western Alaska salmon is to restrict the gear used. Specifically, it can **shorten the legal length of gear that can be used for commercial harvest, especially in the seine and drift gillnet fisheries**—the two highest fisheries impacting Western Alaska salmon.

Restricting gear length is a common practice for fishery managers, including for Kuskokwim River subsistence users. Under recent subsistence fishing gear restrictions in our river, typically, the maximum length of gillnets is 25-50 fathoms (150-300 feet) in length, with 6-inch or less mesh size. Set nets are often restricted down to 60 or 75 feet in length. Reduced set net lengths allow Chinook and chum salmon, which tend swim upriver via deeper mid-river channels, a better chance at reaching their spawning grounds while allowing subsistence users to target abundant, bank-oriented sockeye salmon.

Yet it is not subsistence fishers on the Kuskokwim who should solely shoulder the burden of conservation for stock restoration by adhering to gear restrictions. It is therefore appropriate for the Board to implement gear size restrictions to share in the burden of conservation and uphold its statutory obligations to prioritize escapement and subsistence opportunity. **KRITFC therefore supports the following proposals to foster salmon conservation through gear size reductions:**

- **Proposals 148 and 152**, which call for restrictions to seine gear sizes.
- **Proposal 110**, which would reduce purse seine depth and aggregate length.

VI. Conclusion

It is vital that this Board take action now to adhere to its obligations clearly outlined in its own policy and in State of Alaska statutes to minimize the impact of the Area M fishery on catastrophically declined Western Alaska Chinook and chum salmon stocks.

KRITFC looks forward to conversing with you about these proposals in the coming weeks.

Respectfully submitted,



Martin Andrew
Chair

KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION



KUSKOKWIM RIVER END-OF-SEASON SUMMARY 2025

TRIBES OF THE KUSKOKWIM REGION ARE FACING A HUMANITARIAN AND ECOLOGICAL CRISIS BECAUSE OF CONTINUED MULTI-YEAR, MULTI-SPECIES SALMON DISASTERS THAT THREATEN THE FOOD SECURITY, CULTURAL INTEGRITY, ECOSYSTEMS, AND WELL-BEING OF OUR SUBSISTENCE DEPENDENT COMMUNITIES.

AT A GLANCE

KRITFC is doing all we can to recover and rebuild Kuskokwim River Chinook, chum, and coho salmon stocks for current and future generations.

- For the tenth consecutive year, the U.S. Fish and Wildlife Service and KRITFC formally co-managed salmon harvests in federal waters of the lower Kuskokwim River, providing for conservation and subsistence fishing.
- This is the 12th consecutive year where federal management or Tribal-federal co-management actions resulted in meeting the drainage-wide Chinook escapement goal range.
- In 2025, and in 11 of the past 12 years, in an effort to rebuild the populations, Chinook salmon escapements were at the upper end of the escapement goal range.
- Sonar and weir information show that Chinook and chum salmon returns on the Kuskokwim River remain alarmingly declined, and stocks are far from recovered.
- Sustained declines make it impossible to provide sufficient Chinook and chum fishing opportunities to meet long-term historical subsistence needs.
- Sonar and weir data also indicate that the 2025 coho salmon returns were still below long-term historical levels.

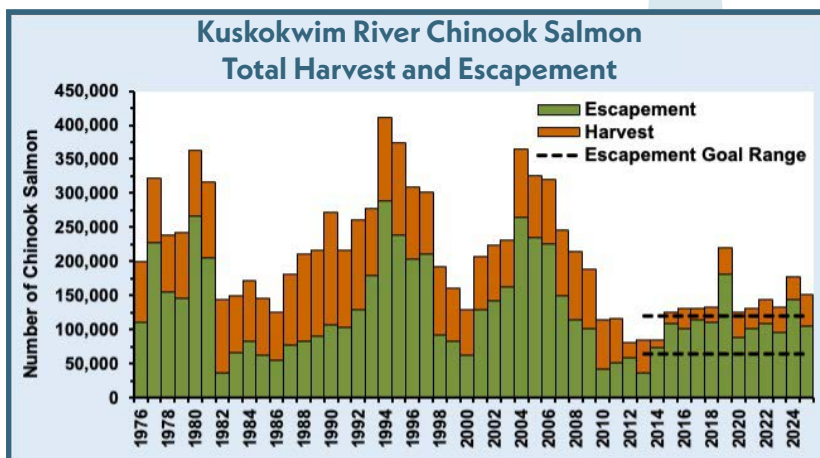
In contrast, the State of Alaska Board of Fisheries (BOF) and North Pacific Fisheries Management Council (NPFMC) continue to allow commercial fisheries in the ocean to take salmon bound for the Kuskokwim.

- We cannot directly control the impact of climate change on our salmon populations, but the State of Alaska and NPFMC do have direct control over the commercial fishing impacts to our salmon in the ocean.
- Despite catastrophic declines of Western Alaska salmon, the policy of the State and the NPFMC is to prioritize commercial use above escapement and subsistence.
- The cumulative removals of Western Alaska Chinook and chum salmon by commercial fisheries in Area M and the Bering Sea remain the number one threat to salmon under human control.

2025 CHINOOK SALMON STATUS

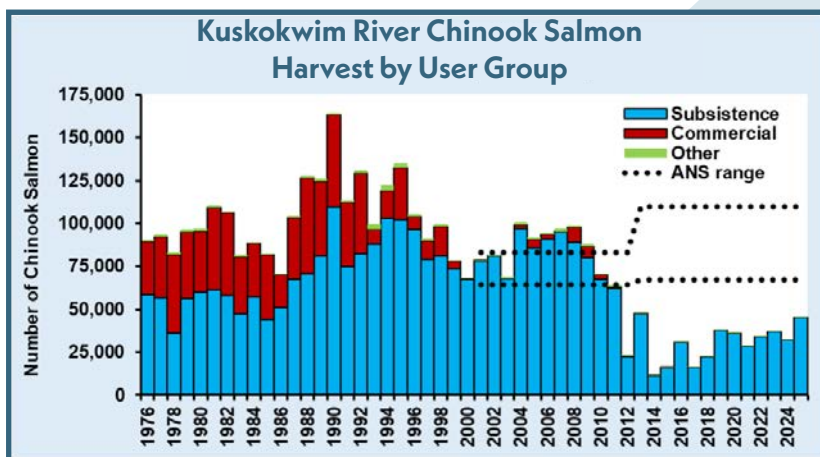
The preliminary estimate for the 2025 Chinook salmon total run size is about 151,000 fish, with an estimated escapement of nearly 105,800 Chinook salmon and river-wide harvest of about 45,600 fish. The 2025 Chinook salmon run began early, with harvests in the headwaters in early June. At first, the run seemed strong, with relatively high passage at the Kuskokwim sonar and harvests by lower Kuskokwim fishers. However, the run plateaued around the 50% passage mark, and end-of-season counts at the Kuskokwim sonar and at several weir sites were below long-term averages. **Kuskokwim River Chinook salmon thus continue to be in a state of decline.** Nonetheless, harvesters reported higher catches of Chinook salmon, and bigger and healthier fish, than in recent years. KRITFC celebrates fuller smokehouses alongside our fishing families.

2025 marks the 12th consecutive year of federal management (and the tenth of Tribal-federal co-management) of Kuskokwim River Chinook salmon within federal waters. As a result of precautionary management and immense sacrifices by subsistence users during this period, this is also the **12th successive year of achieving Chinook salmon spawner abundance within or above the drainage-wide escapement goal range.**



As a result of sacrifices by subsistence harvesters, the drainage-wide escapement goal for Chinook salmon was met for the 12th year in a row, helping to rebuild these stocks.

Kuskokwim River Chinook salmon harvests and total return, 1976-2025. The preliminary 2025 total return was 27% less than the average for 1976-2024.



In order to meet escapement goals, "Amounts Reasonably Necessary for Subsistence" (ANS) have not been met since 2010.

Kuskokwim River Chinook salmon harvest, 1976-2025. The preliminary 2025 subsistence harvest was a 57% decline from the average for 1976-2010.

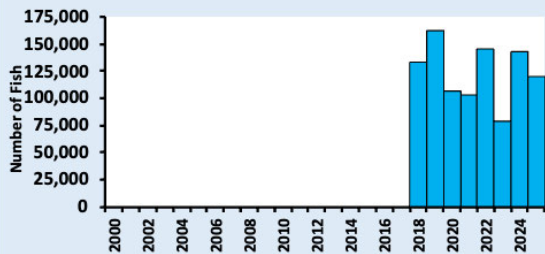
2025 CHINOOK SALMON STATUS

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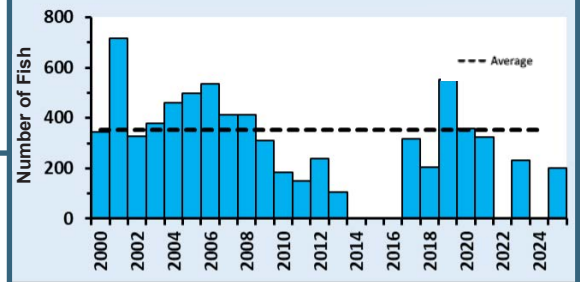
Alarming, Chinook salmon trends at the Kuskokwim sonar, weirs, and test fishery remain below historical abundance.

Kuskokwim River Sonar



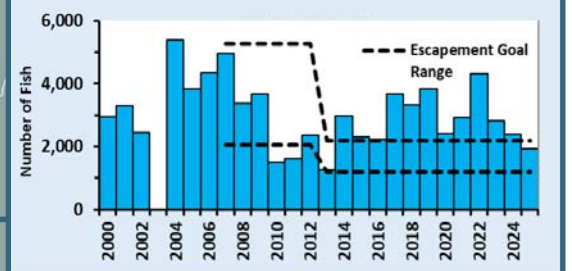
Estimated Chinook salmon passage at the Kuskokwim sonar project 2018-2025. No data available prior to 2018.

Takotna River Weir



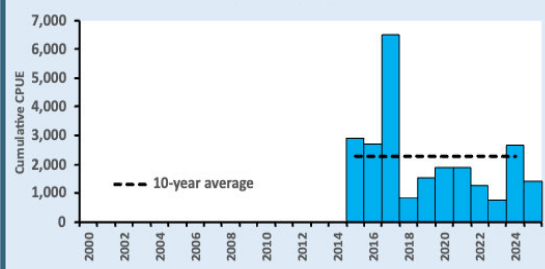
Takotna River weir estimated Chinook salmon counts, 2000-2025. No estimate available for 2014-2016, 2022, or 2024.

George River Weir



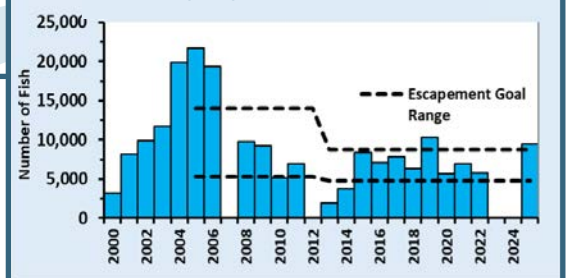
George River weir estimated Chinook salmon counts, 2000-2025. No estimate available for 2003.

Aniak Test Fish



Aniak test fishery estimated Chinook counts, 2015-2025. No data available prior to 2015.

Kogrukluk River Weir



Kogrukluk River weir estimated Chinook salmon counts, 2000-2025. No estimate available for 2007, 2012, 2023, or 2024.

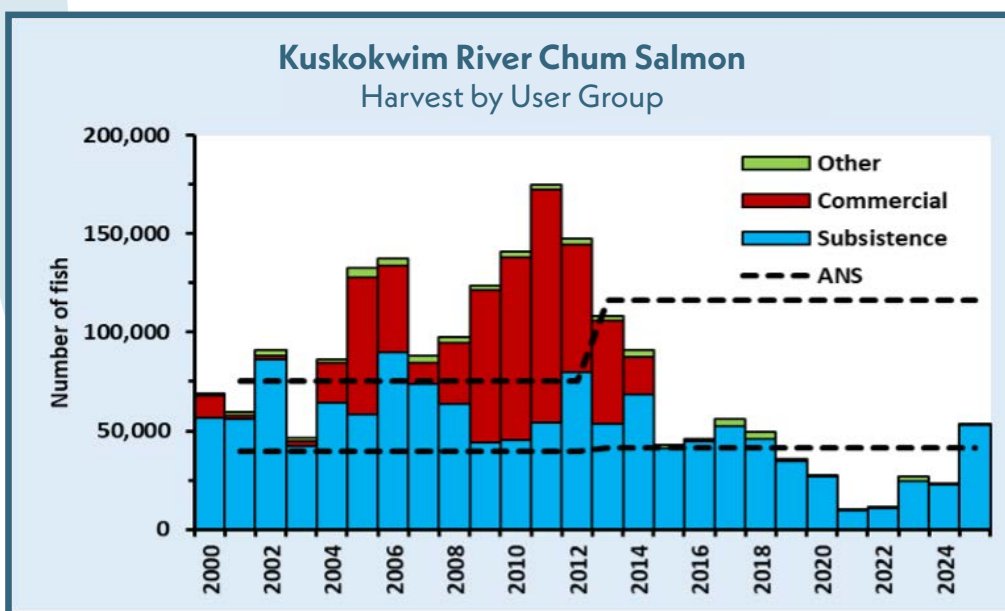


2025 CHUM SALMON STATUS

Kuskokwim River chum salmon populations continue to be depressed, showing minimal signs of recovery.

The 2025 chum salmon run shares a similar story to Chinook salmon. Chum salmon migration began early and seemed strong at the outset. However, by the middle of the run, passage had tapered. At the end of operations on August 24, chum salmon passage at the Kuskokwim River sonar was about 158,100 fish—33% below the 2018-2024 average, and 66% below the pre-2020 collapse average.

The preliminary lower Kuskokwim subsistence harvest estimate for chum salmon, produced with community-based harvest monitoring data compiled by KRITFC, is a minimum of 21,500 fish. Although higher than 2021-2024 harvests, this is well below long-term chum salmon harvests due to fishing restrictions and low chum salmon abundance. Future updated estimates based on ADF&G post-season household surveys may suggest the lower bound of ANS (41,200–116,400 chum salmon) was approached or met in 2025. Fishers across the Kuskokwim reported that they harvested fewer chum salmon than expected. However, most noted that the chum salmon they did catch were good-sized and healthy, which hopefully indicates some recovery of the species to come.



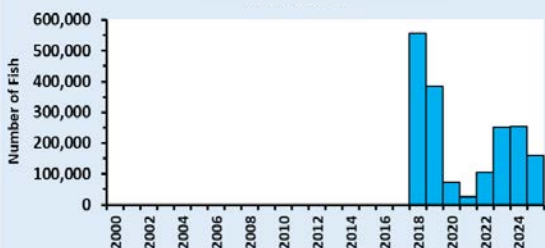
ANS were not met from 2019-2024. While complete 2025 data are not yet available, it is possible, but uncertain, that the low-end of the ANS range was met in 2025.

Due to the ongoing severe chum salmon crash and the need for conservation, the average subsistence harvest during 2020–2024 was 68% less than the 2000–2018 average. 2025 chum salmon harvest estimates are preliminary projections based on in-season and historical harvest data.

2025 CHUM SALMON STATUS

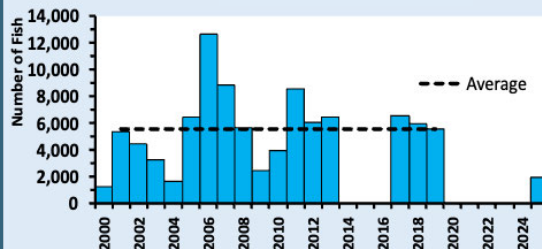
Chum salmon trends at the Kuskokwim sonar and weirs remain well-below average, indicating stocks are far from full recovery.

Kuskokwim River Sonar



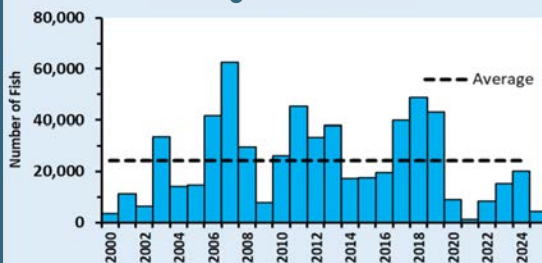
Chum salmon passage at the Kuskokwim sonar, 2018-2025. No data available prior to 2018.

Takotna River Weir



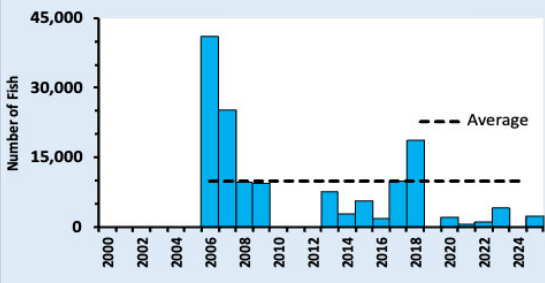
Chum salmon passage at the Takotna River weir, 2000-2025. No estimate available for 2014-2016 or 2020-2024.

George River Weir



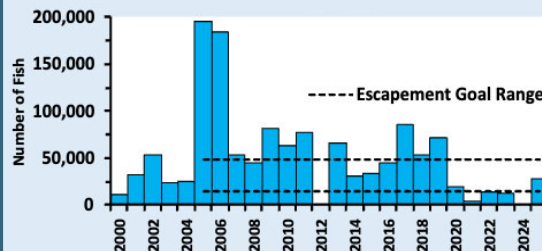
Chum salmon passage at the George River weir, 2000-2025.

Salmon Aniak River Weir



Chum salmon passage at the Salmon-Aniak River weir, 2000-2025. No estimate available for 2010-2012, 2019, 2024, or prior to 2006.

Kogrukluk River Weir



Chum salmon escapement at the Kogrukluk River weir, 2000-2022. No estimate available for 2012 or 2024. The 2025 escapement was 53% below the 2000-2021 average.

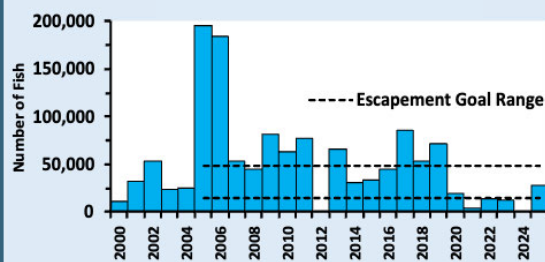


2025 SOCKEYE SALMON STATUS

The 2025 Kuskokwim River sockeye salmon run was again very large compared to those of other salmon species. Sockeye salmon passage counted by the Kuskokwim sonar totaled about 920,600 fish.

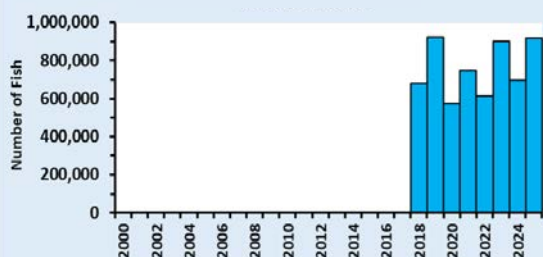


Kogrugluk River Weir



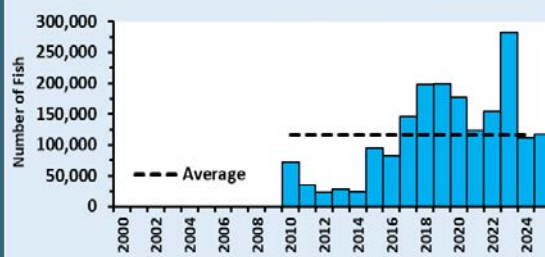
Sockeye salmon passage at the Kogrugluk River weir, 2000-2025. No estimate available for 2012 or 2024.

Kuskokwim River Sonar



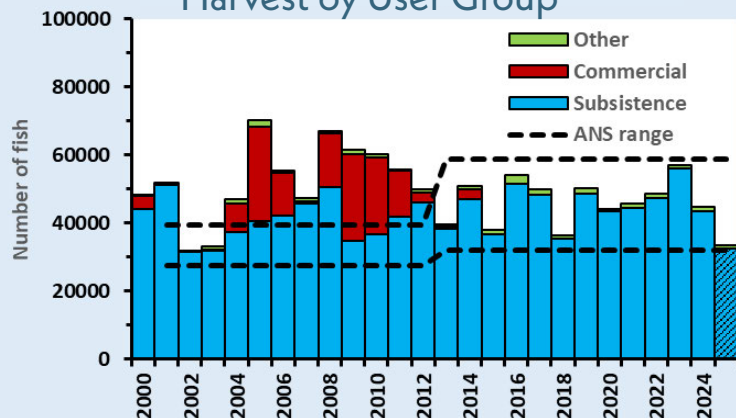
Sockeye salmon passage at the Kuskokwim River sonar, 2018-2024. No data available prior to 2018.

Telaquana River Weir



Sockeye salmon escapement at the Telaquana River weir, 2010-2025. No data available prior to 2010.

Kuskokwim River Sockeye Salmon Harvest by User Group



Sockeye salmon harvest by Kuskokwim River user group, 2000-2025. ANS has been met since 2001.

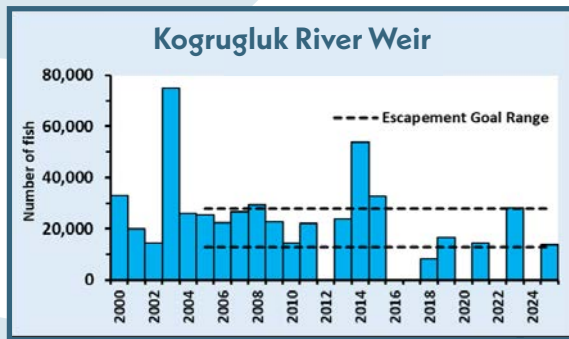
Sockeye salmon harvest by user group, 2000-2025. Commercial harvests since 2016 are confidential and not shown, but are a small portion of the total harvest. 2025 sockeye salmon harvest estimates are preliminary and show only in-season harvest estimates from the lower Kuskokwim, which should be considered a minimum estimate.

2025 COHO SALMON STATUS

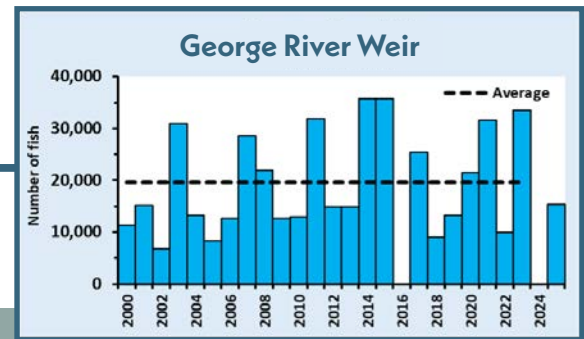
The 2025 Kuskokwim coho salmon run was above the recent 5-year average, but compared to long-term coho salmon abundance on the Kuskokwim, the 2025 run was weak.

While the Kuskokwim sonar passage of about 392,200 coho salmon seemed well-above the recent 2020–2023 average of about 227,900 fish, returns in 2020, 2021, and especially 2022 were among the lowest on record according to both the sonar and Bethel Test Fishery projects. This skews the average low. Moreover, an added a fourth sonar unit more completely covered the span of the river to provide this year's passage estimate. However, a three-sonar count from 2025 is more directly comparable to the recent average, and this count was about 292,400 coho salmon—100,000 fish fewer than the four-sonar count, and only slightly above the 2020–2023 average.

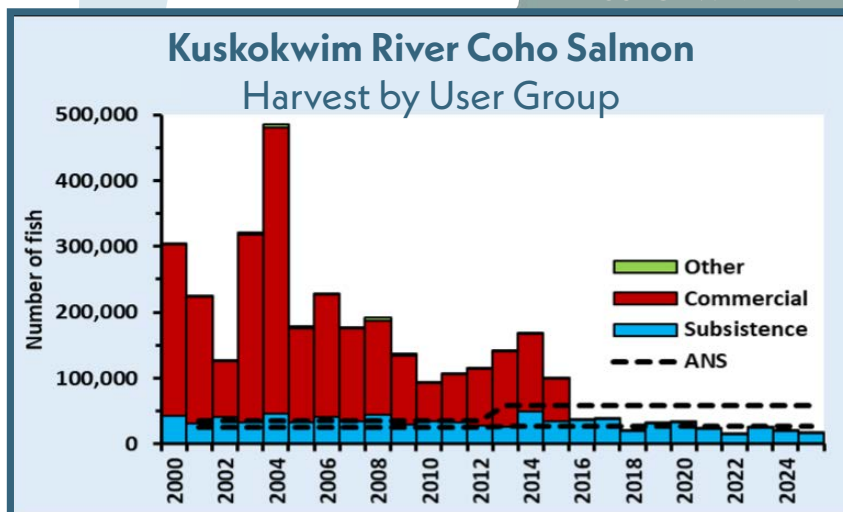
A minimum of 1,900 coho salmon were estimated to have been harvested for subsistence in the lower Kuskokwim before Federal-Tribal management ended on August 7; it is assumed that more subsistence (and commercial) harvests occurred after this point. It is unclear whether the ANS (27,400–57,600) will be met in 2025.



Coho salmon passage at the Kogruluk River weir, 2000–2025. No estimate available for 2012, 2016, 2017, 2020, 2022, or 2024.



Coho salmon escapement at the George River weir, 2000–2025. No estimate available for 2016 or 2024.



The Kuskokwim River ANS was not met in 2013, 2018, or 2021–2024.

Coho salmon harvest by Kuskokwim River user group, 2000–2025. Commercial harvests since 2016 are confidential and not shown but are a small portion of the total harvest. 2025 coho salmon harvest estimates are preliminary projections based on in-season and historical harvest data.

2025 MARINE BYCATCH & COMMERCIAL HARVEST



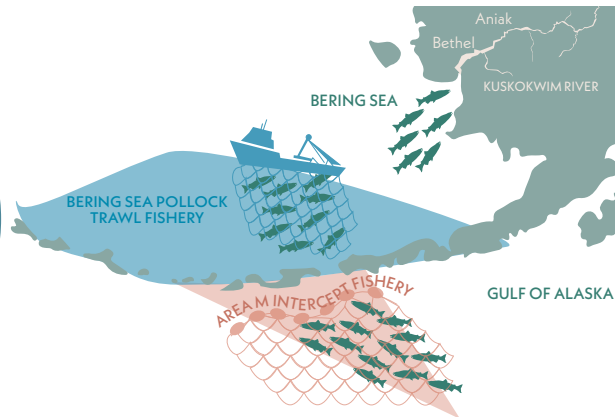
BERING SEA

2025 POLLOCK FISHERY BYCATCH

CHINOOK
19,319

CHUM
139,049

As of September 25, 2025
(includes coastal Western AK,
Asian, and other stocks).



AREA M

2025 COMMERCIAL HARVEST

CHINOOK
13,587

CHUM
165,028

Chinook salmon landings as
of September 4, and chum as
of June 30, 2025 (includes
coastal Western AK, Asian,
and other stocks).

BERING SEA POLLOCK BYCATCH IMPACTS

- Since 2011, Bering Sea pollock trawl fisheries have wasted over 246,000 Chinook salmon and 3.5 million chum salmon caught as bycatch.
- On average, 50% of all Chinook salmon bycatch and 20% of all chum salmon bycatch by Bering Sea trawl fisheries are fish from Western and Interior Alaska rivers, including the Kuskokwim.
- Additionally, the pollock fleet trawls on the ocean floor 40-90% of the time, destroying essential fish habitat.
- Despite continued steep salmon declines, NPFMC and NOAA Fisheries increased the Total Allowable Catch of pollock in 2025.
- The State of Alaska's appointees and industrial trawl interests dominate the membership of the NPFMC. As a result, the NPFMC vigorously resists taking meaningful action to curb trawl impacts to salmon and salmon habitat.

AREA M SALMON COMMERCIAL HARVEST IMPACTS

- Since 2011, Area M June fisheries have harvested and sold over 97,900 Chinook salmon and 6.8 million chum salmon.
- Available genetic data show about 20% of Chinook salmon harvests in Area M, and about 20-30% of chum salmon harvests in recent years, are from Western and Interior Alaska rivers, including the Kuskokwim.
- While rivers across Alaska face Chinook salmon collapses, the Area M fishery is the only commercial fishery in the North Pacific allowed to catch and sell an unlimited number of Chinook salmon.
- The Alaska Board of Fisheries and Department of Fish & Game manage the Area M June fishery as an independent region, even though it is an intercept fishery. This means nearly all salmon landed in Area M are from outside of the Alaska Peninsula region – and many, like Kuskokwim Chinook and chum stocks, are in crisis.

ACKNOWLEDGEMENTS

We gratefully acknowledge the hard work of the following individuals who made fisheries management and monitoring on the Kuskokwim River successful in 2025:

KRITFC In-Season Managers: Betty Magnuson (Upper River), Tracy Simeon (Middle River), Mike Williams Sr. (Lower River), Henry Hunter Sr. (Bethel Area), Paul Cleveland (Tundra/Coast), Jonathan Samuelson (Upper River alternate), Walter Morgan (Middle River alternate), Martin Andrew (Lower River alternate), Ralph Nelson (Bethel Area alternate), Noah Wise (Tundra/Coast alternate), James Nicori (Elder Advisor), and Nick Alexia Sr. (Elder Advisor).

U.S. Fish and Wildlife Service: Spencer Rearden, Aaron Moses, Christopher Tulik, Emmitt Nicori, Christian Alexie Jr., Nate Akers, and Laurie Boeck.

Community Based Harvest Monitors: Carl Napoka Jr. (Tuluksak), Carol Hoagland (Akiak), Crystal Lake (Akiak), Moselle Alexie (Akiachak), Kyra Phillip (Akiachak), Vendella Snyder (Akiachak), Alfred Epchook (Kwethluk), Elizabeth Phillip (Kwethluk), Wesley Nicholai (Napaskiak), Aaron Williams (Napaskiak), Peter Nelson (Napaskiak), Verlaine Chris (Tuntutuliak), Susan Jimmie (Tuntutuliak), and Brentina White (Eek). We also acknowledge the work of Orustsaramiut Traditional Native Council's Fisheries Technicians, KRITFC staff, and Yukon Delta National Wildlife Refuge staff to collect Bethel area harvest surveys and aerial boat/net survey data.

Kwethluk Rotary Screw Trap Project Crew: Nate Akers (crew lead), Andrew Magel (KRITFC Fisheries Biologist), Patrick Gregory (Tuluksak), Tim Michael (Kwethluk), Skyler Evans (Bethel), and Daniel O'Connor (KRITFC Fisheries Technician).

Takotna River Weir Project Crew: Robert Perkins (crew lead), Manuel Martinez, Richie Wachter, Daniel Dopler, Junior Martinez, Larry Fox, Dean Gray, and Josiah Martinez.

Camera-Based Escapement Monitoring Crew: Dr. Daniel Auerbach (project lead), Dan Gillikin (Salmon Aniak River Weir crew lead), Aden Burch (Lead, ANSEP), Daniel Dopler (Takotna), and Carley Kelila (Aniak).

QUYANA, DOGIDINH, CHIN'AN, TSEN'ANH, THANK YOU

KUSKOKWIM RIVER
INTER-TRIBAL FISH COMMISSION



Name: Jaosn Lee
Myself

Community of Residence: Cordova

ACR 2 is entirely allocative in nature. Accepting ACRs of this nature out of cycle creates instability in Alaskan homes across the state, such as ours.

'Early run' Copper river stocks are the beginning of several major upriver run components and if anyone is familiar with these run timings (or any salmon runs in the ocean statewide) they know that they can peak quickly, and waiting for a 'sonar trigger' for commercial harvest would handcuff ADFnG managers. Effectively this is a tactic for re-allocation of fish stocks.

As for conservation concerns, the Copper has regularly met or exceeded its escapement in its history of sonar counting.

Name: Alyssa Lorain
Myself

Community of Residence: Gladstone, Oregon

I support ACR 5!

Name: Michael Lorain
Myself

Community of Residence: Gladstone, Oregon

I support ACR 5. The green crab problem must be discussed in greater detail at upcoming board meetings.

Name: Eric Lunde
Myself

Community of Residence: Ketchikan

I am writing in support of ACR 5

Reclassify European green crab from a class A to a class B banned invasive species (5 AAC 41.075).

European Green Crab have established breeding populations in Southern SE Alaska. Coastal currents will spread larvae north. This poses a threat to vital habitat and several fisheries, but especially Dungeness crab.

Stopping or slowing the spread is going to take a monumental effort by fishermen, volunteers, tribes, business , and local governments. Reclassifying EGC to a class B invasive species would remove regulatory burdens for eradication and control efforts.

There is no good reason for the State of Alaska to make it difficult to kill these things. They don't belong here.

Fishes & Dishes
Ketchikan, Alaska

October 10, 2026

Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Support for ACR 5 (5 AAC 41.075) Regarding European Green Crab

Dear Members of the Board of Fisheries:

My name is Tomi Marsh, and I own and operate Fishes & Dishes, a local seafood business in Ketchikan, Alaska. Our business is built around promoting the importance, sustainability, and future of Alaska's seafood industry. We source our seafood exclusively from Alaska, with much of it coming directly from our community here in Ketchikan. In addition to serving local residents and visitors, we provide educational materials at our food truck to help customers learn more about Alaska's seafood resources, fisheries, communities, and working waterfronts.

We have been following the spread of European green crab in Southeast Alaska since its arrival in the region approximately four years ago. We are deeply concerned about the potential impacts of this invasive species on our partners in the mariculture, crab, and dive fisheries, as well as on the broader marine ecosystems that support our local seafood economy.

At Fishes & Dishes, we believe there may also be an opportunity for our business to contribute to the response by exploring green crab as a potential food product. Communities on the East Coast have been dealing with European green crab for years, and researchers, chefs, and seafood businesses have been exploring ways to develop markets for this invasive species. For example, the University of New Hampshire Cooperative Extension has published the Green Crab Guide in the Field and the Kitchen, while Mary Parks and Thanh Thai created The Green Crab Cookbook: An Invasive Species Meets a Culinary Solution. Thus, recent summits, seafood expos, and cookbooks reflect growing interest in culinary approaches to the issue of invasive species. Although green crab is unlikely to command the same market demand as Alaska's Dungeness or king crab, we believe it may offer a niche opportunity, particularly among cruise ship passengers and other visitors interested in unique, locally relevant seafood experiences.

We recognize that establishing a commercial green crab fishery in Alaska may not be feasible in the near term, nor should it be an incentive to maintain an invasive population. However, there still remains important questions about population distribution, harvesting methods, food safety, market demand, and the potential role of commercial harvest in controlling the species. Nevertheless, we do not expect this challenge to disappear quickly. Long-term management strategies will be necessary to limit the spread and impacts of green crab and protect Alaska's native marine resources and existing fisheries.

Over time, carefully managed harvesting and potential commercial utilization could become one component of a broader management strategy, provided that research demonstrates it can contribute to control efforts without creating unintended encouragement to support or expand the invasive population. If green crab is going to remain a management challenge, we believe it is worth exploring whether responsible harvesting, public education, and product development can contribute to the response.

For these reasons, **Fishes & Dishes supports the passage of ACR 5**, which would change the designation of green crab and ease restrictions on members of the public harvesting and consuming this crab species. We see this as an opportunity to begin learning more about public interest, culinary applications, and potential market development while helping our community engage with the issue. It could also lay the groundwork for evaluating whether green crab products might eventually be offered to Ketchikan residents and visitors, subject to applicable regulations and future management guidance.

We view this as an opportunity to bring local businesses, harvesters, researchers, and community members into a constructive conversation about how to respond to an invasive species while protecting the marine resources on which our livelihoods depend. We appreciate the Board's consideration of ACR 5 and its continued work to address the challenges facing Alaska's fisheries and coastal communities.

Thank you for your time and consideration.

Sincerely,

Tomi Marsh
Owner & Operator
Fishes & Dishes
Ketchikan, Alaska



MATANUSKA-SUSITNA BOROUGH

Fish & Wildlife Commission

Planning and Land Use Department

Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

<https://www.matsu.gov> • planning@matsu.gov

October 13, 2026

Marit Carlson-Van Dort
Chair, Alaska Board of Fisheries
Committee on Board Process, Management, and Research Needs
P.O. Box 115526
Juneau, AK 99811-5526

RE: Department of Law recommendation addressing proposal 186 as amended and adopted by the Board of Fish March 2026

Dear Ms. Carlson-Van Dort,

On behalf of the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC), I am seeking clarification on how the Department of Law will be advising the Alaska Board of Fisheries (BOF) on proposal 186 as amended and adopted by the BOF during the Statewide and Supplemental Issues meeting occurring on March 17-21, 2026. Furthermore, we are seeking guidance on how we can ensure the issues and ideas presented in proposal 186 as amended can be revisited during the BOF Upper Cook Inlet Finish meeting from March 4-15, 2027.

Background

During the BOF Work Session on October 28-29, 2025, Agenda Change Request (ACR) 5 was submitted by Andy Couch and addressed by the BOF in the same manner as the other ACRs submitted. Upon completion of the review and deliberation, the BOF accepted ACR5 and scheduled this ACR for the Statewide Finfish meeting on March 17-21, 2026. ACR5 was later identified as Proposal 186.

At the March 2026 BOF meeting, after public testimony and further comment and discussion during the Committee of the Whole, Proposal 186 was amended with substitute language and submitted as Record Copy 161. Following deliberation, the BOF passed the amended proposal by a vote of 4-2, with one abstention. With this action, many of the affected public, including the FWC, were under the assumption that these regulatory changes adopted by the BOF during the Statewide meeting would go into effect prior to the 2026 fishing season. On June 4, however, the Alaska Department of Fish and Game issued a Fisheries Update stating that the new regulations “are still undergoing review by the Alaska Department of Law” and that the Central District Commercial Drift Gillnet Fishery would be managed under the existing regulations “until the

Providing Outstanding Borough Services to the Matanuska-Susitna Community

new regulations become effective 30 days after they are filed by the Lieutenant Governor.” This did not occur, and the reasons/justification for this delay have not been explained to the public.

The regular BOF meeting addressing Upper Cook Inlet fisheries management is scheduled for the 2026/2027 meeting cycle. The deadline for proposals for this meeting cycle was April 10, 2026. Many of the affected public, including the FWC, were under the assumption that the new regulations adopted by the BOF during the Statewide meeting would be in effect the 2026 fishing season, and thus did not need to submit a proposal for the 2027 meeting. Only after the proposal deadline did we learn that the regulations were under legal review and could possibly be rejected by the Department of Law and Lieutenant Governor.

Discussion of Concerns

Proposal 186 as amended seeks to ensure adequate escapement and a harvestable surplus of salmon into the Northern District drainages and to provide management guidelines to the department. The department was instructed to manage the commercial drift gillnet fishery to minimize the harvest of Northern District salmon and Kenai River coho salmon in order to provide all users with a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of in-river restrictions. Unfortunately, this management plan as adopted by the BOF was not for the 2026 season.

If the public, and specifically the FWC, could have possibly been aware of the regulations not going into effect due to the lengthy legal review process by the Department of Law, they would have submitted a proposal addressing the same issues prior to the April 10, 2026, proposal deadline. As of today, the proposals addressing the Upper Cook Inlet have not been made available to the public. With this in mind, the FWC is very concerned there may not be a way for the BOF to adequately address the issues reflected in proposal 186 during this upcoming meeting cycle.

The Matanuska-Susitna Borough Fish and Wildlife Commission respectfully requests an explanation from the Department of Law on why the new regulations for the commercial drift gillnet fishery adopted by the BOF were not approved and put into effect. We further request guidance on how the FWC, and the broader public, can make sure those issues raised and adopted by the BOF in proposal 186 as amended will be placed on the agenda for the Upper Cook Inlet Finfish meeting in March 2027. We appreciate you and the other board members' service to our state, and we look forward to responses regarding our concerns.

Sincerely,



Pete Probasco
Chair, MSB Fish & Wildlife Commission

Cc: ADF&G Commissioner, Mat-Su Borough Mayor, Mat-Su Borough Manager, Mat-Su Delegation

COUNCIL ANNETTE ISLANDS RESERVE ^{PC26}

METLAKATLA INDIAN COMMUNITY

ALBERT G. SMITH, MAYOR
JUDITH A. EATON, EXECUTIVE TRIBAL SECRETARY
DARCY BOOTH, TREASURER

ESTABLISHED 1887

POST OFFICE BOX 8
METLAKATLA, ALASKA 99926
PHONE (907) 886-4441
FAX (907) 886-7997

Dear Board of Fisheries Representatives,

The Metlakatla Indian Community Department of Fish and Wildlife has been monitoring for the invasive European Green Crab (EGC) since 2021. We discovered the first molt in Alaska alongside Alaska SeaGrant interns on July 19th 2022, and one week later found the first live crab in the State of Alaska. Since then, we have increased our trapping efforts and expanded our program, and this last year we have removed over 77,000 EGC since 2022.

EGC are a highly invasive crab originating from Europe. They were transported to the east coast of North America in the early 1800s through rock ballast, and in the 1980s to San Francisco Bay through live seafood packing materials. Since the 1980s, ocean currents have pushed larval EGC up the west coast of North America, establishing populations in Washington State in 1998 and British Columbia in 1999 (Yamada, 2001). Research from the east and west coast has shown negative impacts on eelgrass (*Zostera marina*) (Malyshev & Quijón, 2011), shellfish (Grosholz & Ruiz, 1995), and native Dungeness crab (*Metacarcinus magister*) populations (McDonald et al., 2001). Coastal Alaskans rely on these resources whether directly or indirectly, and as climate change further threatens these resources, the impacts from EGC could be devastating. Additionally, research on invasive species management shows that the longer it takes to begin managing an invasive species, the more it costs society in the long run in environmental damages and management costs (Hobbs & Humphries, 1995).

In Metlakatla, our first season trapping in 2022 we removed 726 EGC. The following year in 2023 we removed 2,022 EGC, and 2024 1,454. In 2024, we noticed a large influx of small young-of-the-year EGC and did our best to hand remove as many as possible. Despite our efforts of hand removal, we didn't anticipate removing nearly 28x more crab in 2025 than in 2024, with 41,312 EGC removed from Annette Islands Reserve (AIR) waters. This year, we are on track to meet or exceed last year's catch, currently at 33,804 EGC removed for the year, as of September 1st, 2026 (Figure 1; Image 1).

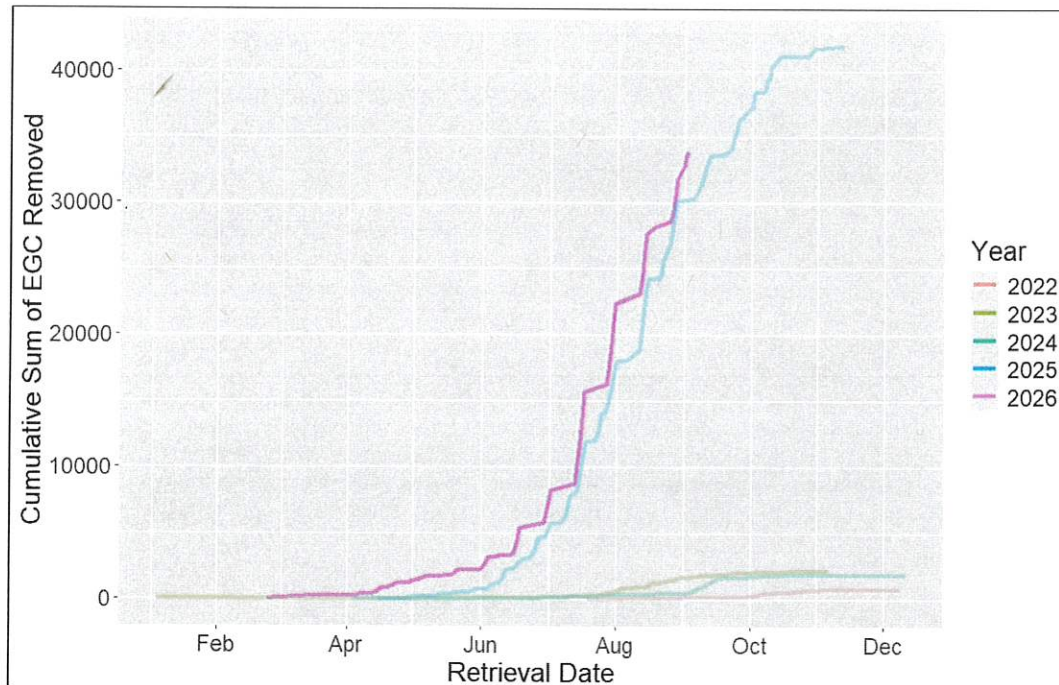


Figure 1: Cumulative yearly EGC catch on Annette Islands Reserve.



Image 1: Loading frozen EGC into a fish tote for freezer storage. These crabs represent approximately two months of trapping effort in the summer. We later filled this tote completely and have several 5-gallon containers full of crab in addition to the full fish tote. This winter, these crabs will be measured and composted.

Throughout our EGC trapping program, we have been closely monitoring our bycatch, as our most prominent EGC trapping site is also our most important community subsistence area. It also hosts one of the largest eelgrass beds on Annette Island and is surrounded by salmon-bearing streams. High abundances of EGC can disrupt the delicate root system of eelgrass, causing declines in density and area of eelgrass beds. Eelgrass beds are a nursery for all salmonid species, sculpin, juvenile native crabs, and more. As climate change and other factors threaten our salmon runs, we have a responsibility to do everything in our power to protect and preserve them: for the future of commercial and subsistence fisherman.

At the beginning of our program, we started seeing declines in the number of Dungeness crabs caught in our crab pots, which target small and juvenile crabs. Presently, we have seen a stabilization of the number of Dungeness crabs we are catching, and local repopulation in some areas. This shows that there must be active management to protect and preserve important Dungeness crab populations in Southeast Alaska.

Additionally, next year is projecting to be a Super El Niño, in which water temperatures will be warmer and more favorable for EGC reproduction and population expansion. Past evidence of EGC expansion around Washington State and throughout British Columbia to Alaska have coincided with an El Niño. There was an El Niño in the winter of 2024, which led to a strong successful recruitment of EGC that then began being caught in 2025.

In Ketchikan, the Ketchikan Indian Community, Sealaska Corporation, and the Ketchikan High School Ocean Bowl Team (led by Keenan Sanderson, Ketchikan Indian Community member(?)) have been trapping throughout the summer and have removed almost 6,000 EGC this year alone. There has been one trapping effort led by the State in 2025 in Bostwick Inlet near Ketchikan. Other than that, all EGC removal trapping in the Ketchikan area and Southeast Alaska area has been tribally led. The first live detection of EGC in Ketchikan was last autumn. Their catch pattern follows what we saw in our first years trapping, and they will likely have tens of thousands of EGC next year if they are able to set enough crab traps.

The organizations in Ketchikan and remote surrounding areas have been working incredibly hard, but they simply do not have the capacity or funding yet to conduct large scale trapping efforts that are necessary for managing EGC in and around the remote areas of Southeast Alaska.

All of this to say, this ACR being proposed is a good and necessary first step to managing EGC in Alaska. The present regulations prohibit anyone without an Aquatic Resource Permit (ARP) from possessing any part of an EGC, live or dead, or genetic material. The

proposal would allow members of the public to kill EGC and harvest them, contributing to the management of EGC until the State of Alaska begins funding research, trapping and removal programs. The end goal, however, must be that the State of Alaska provides funding for scientific research and trapping efforts to slow and prevent the devastating impacts that EGC can create.

We hope that you consider the agenda change request as this issue must be investigated and discussed prior to the next meeting cycle in 2028.

Sincerely,



Mayor Albert G Smith
Metlakatla Indian Community

References

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Yamada, S. B. (2001). *Global Invader: The European Green Crab*.
<https://repository.library.noaa.gov/view/noaa/44992>

Name: Delaney Murphy
Myself

Community of Residence: Ketchikan

I am writing in support of ACR 5 reclassifying European green crab from a class A to a class B banned invasive species.

The time to act is now, not 2028. European green crab are actively and aggressively invading Alaska, and the science tells us this problem will become exponentially worse with the effects of El Niño. Research can and should continue, but we do not need to imagine what will happen to our coastal ecosystems with the presence of European green crab because we have already seen the devastating impacts along the west coast of the US and Canada. This is currently a southern southeast issue in Alaska, but very soon it will be a coastal Alaska issue with far reaching consequences across the state.

I am an ordinary Alaskan. I come from multiple generations of commercial fishermen, and I make my living on the water in the tourism industry. I joined the EGC monitoring effort after the initial discovery on Annette Island in 2022. In only a few years I have personally witnessed areas once free from this invasive species become utterly inundated with their presence. Attached to my comment is a document including photos from Gravina Island and Revillagigedo Island taken between June-September 2026. The rate at which this species is spreading and continuing north is nothing short of alarming. The Annette Islands Reserve Department of Fish & Wildlife reported over 33,000 green crab trapped in 2026 as of August. In Ketchikan, the count was over 6000 as of mid-September. Monitoring and small scale trapping alone will not be enough to manage this crisis.

I implore you to take action now, the European green crab invasion will not wait.

Name: John Murray
att Myself

Community of Residence: sitka

Comments on ACR 13 I'm opposed for the following.

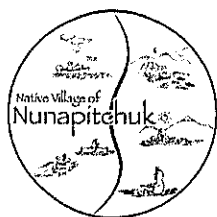
1) this is a very important agenda item Statewide because it has very wide implications . It needs to go through a Statewide BOF meeting. Where salmon fisherman , AC's and other parties can weigh in after a proposal like this has been vetted via the process. both locally and at the Board level.

2) Because Southeast king salmon management has Treaty wrapped in its management, this should be weighed carefully.

3) I don't concur with the rational to go the route this group has taken. I do not see a timing issue or the need for an ACR.

Please weigh this cautiously.

Sincerly John Murray [REDACTED] Sitka Ak



Native Village of Nunapitchuk
 Nunapitchuk IRA Council
 PO Box 130
 Nunapitchuk, AK 99641
 Phone: 907-527-5705 Fax 907-527-5711

October 9, 2026

Märit Carlson-van Dort
 Chair, Alaska Board of Fisheries
 P.O. Box 115526
 Juneau, AK 99811-5526

Dear Chair Carlson-van Dort and members of the Board,

The Native Village of Nunapitchuk provides the following comments on Agenda Change Requests (ACRs) submitted for the October 2026 Work Session. Nunapitchuk is located on the Johnson River up maybe 20 miles or so, and our tribal members are 1,128.

Our TribesupportsACRs 6, 7, 8, 9, 10, 11, and 13, and asks the Board of Fisheries (Board) to approve them for the 2026-2027 meeting cycle.

Salmon are essential for the way of life of our community. They provide for our physical, cultural, spiritual, economic, and communal well-being. Salmon are also critical for the ecosystem, providing nutrients for other fauna and flora that our Tribal citizens rely upon. Salmon is important to my tribal members as they subsist off the Kuskowim River and they have fish camps up and down.

However, through 2026, multiple species of salmon in the Kuskokwim River remain in states of poor abundance. Concern for the conservation of Chinook, chum, and coho salmon led managers to implement extensive subsistence fishing closures across the Kuskokwim drainage this year. These closures created heavy sacrificed for our Tribal families, especially as they came amidst cuts to funding to support food security, and immense increases in the price of gas and imported food. We have to commute to the mouth of Johnson River and a little below the Kuskokwim River to harvest a good catch. Commuting takes about 45 minutes using about 6 gallons of gas.

In February 2026, the Board of Fisheries took important and critically necessary steps to implement conservation measures in the South Alaska Peninsula (Area M) fishery in order to protect chum and Chinook salmon from Western Alaska migrating through that fishery. These steps included adopting proposals to reduce fishing time in the month of June (amended Proposal 127), enforce king salmon caps in the post-June fishery (Proposal 141), and reduce the size of drift gillnet and seine gear (Proposals 147 and 148).

However, in May, the State of Alaska Acting Attorney General voided the Board's actions on these proposals. This came as a shock and extreme disappointment to our Tribe, which, along with other communities in the Kuskokwim, has been solely shouldering the burden of conservation for our salmon for over a decade.

We ask the Board to approve ACRs 6, 7, 8, 9, 10, and 11 for this winter's meeting cycle so that the Board can reconsider these proposals for conservation in Area M to help sustain salmon and our Tribal community's ways of life. We also ask the Board to approve ACR 13 to create a standardized statewide retention and reporting requirement for Chinook salmon harvests in commercial fisheries. PC29

Sincerely,

Noah A. Wise

Noah A. Wise/President



North Pacific Fisheries Association
P.O. Box 796 Homer, AK 99603
npfahomer@gmail.com // www.npfahomer.com

Chair Carlson-Van Dort
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

October 13, 2026

RE: OPPOSITION to ACRs submitted for Board of Fisheries Work Session

Dear Chair Carlson-Van Dort,

North Pacific Fisheries Association (NPFA) represents more than 60 independent commercial fishermen, their families, and crewmembers. Based in Homer, our members fish from Dixon Entrance to St. Matthew Island and are directly impacted by the decisions made by the State's Board of Fisheries (BOF).

NPFA agrees with ADF&G staff that none of these ACRs meet the Board's criteria. ACRs are reserved for conservation needs, regulatory errors, and unforeseen effects, not allocative changes lacking compelling new information. NPFA specifically OPPOSES:

- **ACR 3 (hatchery egg-take cap):** No evidence links egg-take levels to wild stock declines. This recurring proposal should await Alaska Hatchery Research Program results in the statewide finfish cycle.
- **ACRs 6 and 7 (Area M June closure):** These revive Proposal 127, reversed by the Attorney General (AG) and are allocative per staff, and would undercut the voluntary chum hotspot reporting and stand-downs that have successfully reduced June chum harvest in Area M.
- **ACR 8 (South Alaska Peninsula king salmon caps):** This revives Proposal 141, also overturned by the AG and allocative. The Alaska Department of Fish and Game already takes in-season Chinook action in the Shumagin District.
- **ACRs 9 and 10 (gillnet and seine size):** These revive Proposals 147 and 148, also overturned by the AG. ADF&G lacks depth-migration data, and the changes would cut commercial opportunity under gear rules in place for over 30 years.
- **ACR 11 (Chinook discard ban in seines):** This repeals a conservation tool adopted last cycle, turning live release into 100% mortality.
- **ACR 13 (statewide Chinook retention):** Mandatory retention would raise Chinook mortality statewide, undermine gains such as the Taku River stock now likely headed for de-listing in 2028, and could affect Southeast troll treaty obligations with Canada.

NPFA respectfully urges the Board to **reject these ACRs**. Thank you for the opportunity to comment.

Malcolm Milne
President, North Pacific Fisheries Association

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Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

October 13, 2026

Re: Follow-up on pelagic trawl seafloor contact accountability from the 2026 Statewide Finfish meeting

Dear Chair Carlson-Van Dort and Members of the Board:

Ocean Conservancy¹ submits the following comments for the Board's October 2026 Work Session. In March 2026, the Board deferred action on Proposals 163, 164, and 165, pending more information to be heard at the October 16 Joint Protocol Committee meeting with the North Pacific Fishery Management Council. At its March 2026 meeting, Board members confirmed on the record their desire to address pelagic trawl seafloor contact through a Board-generated proposal developed at the October 2026 Work Session. We therefore urge the Board to follow through and generate a proposal to verify compliance with Alaska's pelagic trawl definition in state waters and schedule it for the 2026-27 cycle.

Proposals 163 through 165 drew more than 1,500 public support signatures and testimony from harvesters, subsistence users and coastal communities. Submissions documented commercially available bottom contact sensors from multiple manufacturers (RC144; RC040). The Joint Protocol Committee supports information sharing, but regulatory authority over gear in state waters rests with the Board.

State regulation prohibits pelagic trawl gear from contacting the seafloor (5 AAC 39.105), but there is currently no associated verification requirement or enforcement mechanism. Furthermore, state waters closed to bottom trawling stay open to pelagic gear on the premise that pelagic trawl gear fishes off bottom. Federal data sharply undercut that premise. Pelagic trawl gear is responsible for roughly 34% of seafloor contact in Alaska federal waters ([Zaleski et al. 2022](#), Table 1). Bottom contact adjustment estimates run 20-

¹ Ocean Conservancy is a non-profit organization working to protect the ocean from today's greatest global challenges. Together with our partners, we create evidence-based solutions for a healthy ocean and the wildlife and communities that depend on it

60% for pelagic trawl catcher vessels and 70-100% for catcher processors ([Zaleski et al. 2022](#), Table A2.1). Pelagic trawl gear makes significant bottom contact, even in areas closed to bottom trawling. This loophole and lack of accountability erodes state regulatory credibility and creates elevated and unaccounted-for risks to benthic habitat and non-target species, including salmon and crab.

Seafloor contact verification is practicable and enforceable. NOAA's Office of Law Enforcement has advised that existing sensors can support enforcement ([NPFMC 2023](#)). Most trawl vessels already carry acoustic net sensor systems compatible with bottom contact sensors such as the [Notus Trawlmaster](#) and [Simrad PI50](#). A regulatory verification requirement would strengthen management efficacy and trawl accountability in state waters.

To create an enforcement mechanism for the existing prohibition on seafloor contact by pelagic trawl gear in state waters, a Board proposal should, at minimum:

- 1. Require pelagic trawl vessels in state waters to carry a functioning bottom contact sensor on the footrope during each tow.**
- 2. Require vessels to record and retain sensor data and make it available to ADF&G and Alaska Wildlife Troopers on request.**
- 3. Disallow pelagic trawling in areas closed to bottom trawling until such time as the verification mechanisms are in place.**

Board Members signaled in March that October was the time to act. The science is clear, and the technology is available. We urge the Board to generate this proposal at the Work Session for the 2026-27 Board of Fish cycle.

Thank you for your consideration.

Sincerely,



Megan Williams, PhD
Associate Director, Arctic & Northern Waters
Ocean Conservancy

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October 13, 2026

Alaska Board of Fisheries
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RE: Work Session - Request for Board-Generated Proposal on Pelagic Trawl Gear in State Waters

Dear Chair Carlson-Van Dort and Members of the Board:

Oceana requests that the Board of Fisheries (Board) use the information shared at the Joint Protocol Committee (JPC) meeting, together with existing analyses and data showing that pelagic trawl gear operates on the seafloor, to develop a Board proposal at this October 28-29 Work Session and enforce the state of Alaska's definition of pelagic trawl gear in Alaska state waters. We ask that the Board effectively prohibit, monitor, and enforce pelagic trawl gear operating on the seafloor and require the use of salmon bycatch excluders. We urge you to not rely on the federal Fishing Effects Model's outputs to judge habitat impacts in state waters for the reasons covered below.

In March 2026, the Board of Fisheries took up Proposals 163, 164, and 165, authored by the Alaska Healthy Habitat Alliance (AHHA), at its Statewide Finfish meeting.¹ The three proposals aimed to reduce pelagic trawl bycatch and habitat impacts by increasing accountability, requiring the use of salmon excluder devices, and enforcing existing rules for pelagic trawl gear operating in Alaska state waters.

These proposals followed analyses produced by the North Pacific Fishery Management Council (Council) and related research reports confirming that 40-100% of the width of pelagic trawl gear is in contact with the seafloor per tow, depending on the method and vessel type.² In stark contrast, Alaska's state definition of pelagic trawl gear describes a trawl where the net, the doors, or other spreading devices do not operate in contact with the seabed and which has no protective devices, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing on the seabed.³ At the Council's June 2026 meeting, pelagic trawl fishermen testified that they commonly operate on the seafloor and that they cannot effectively catch pollock if they are restricted from dragging their nets across it.⁴ Gear fished in this manner does not meet the state's definition, yet it is allowed in areas closed to bottom trawling, originally to protect corals, sponges, crab, and other benthic species.

¹ Alaska Healthy Habitat Alliance, Proposals 163-165 Alaska Board of Fisheries, Statewide Finfish and Supplemental Issues Meeting (Mar. 2026).

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/proposals/163.pdf> (and /164.pdf, /165.pdf).

² Zaleski et al., 2022 Evaluation of Fishing Effects on Essential Fish Habitat

³ Alaska Admin. Code tit. 5, § 39.105(d)(10)(C).

⁴ NPFMC, Agenda Item D1, Pelagic Trawl Gear Research Updates. Public testimony (June 2026).

Why the Board Referred This Issue to the Joint Protocol Committee

The Board took “no action” on the three proposals in March 2026 and instead asked to exchange information on pelagic trawl gear with the Council through the Joint Protocol Committee. Board members said the JPC would educate the members so the state could move forward as it sees fit with a proposal aimed at reducing salmon bycatch and habitat disturbance from the pelagic trawl fleet for its own waters, habitat, and fisheries.⁵ Alaska Department of Fish and Game (ADF&G) Commissioner Vincent-Lang said, “we now realize that we have some contact with the bottom with pelagic gear,” and that, “We want to work on those definitions.” Chair Carlson-Van Dort said she preferred a Board-generated proposal, with language by the next work session that could be noticed under the Administrative Procedure Act and scheduled in the next cycle. Board Member Wood said he was committed to making sure the issue is not lost or delayed.⁶ We request the Board follow-through on these statements at its October 28-29, 2026 work session, following the October 16 JPC exchange.

The Federal Fishing Effects Model Was Not Built for State Waters' Habitat or Fisheries

We are glad the Board intends to explore this issue. We are concerned, however, that the JPC exchange will rely on information derived from the federal Fishing Effects (FE) Model, which shows little negative effect on seafloor habitats from pelagic trawl gear. We believe that result reflects flaws in the model, not an absence of impact, and that it should not guide the Board, for two important reasons.

First, the FE model in its current form has not been shown to produce accurate results in state waters or for state-managed fisheries. The National Marine Fisheries Service (NMFS) has said it does not plan to analyze new information on non-Magnuson-Stevens Act fishing, which includes state-managed fisheries, in its 2028 review.⁷ Second, the assumptions in the FE model understate the effects of fishing on long-lived habitat features even in federal waters, and they fit state waters even less well:

- The FE model uses 5 km × 5 km grid cells to examine seafloor habitat and impacts from fishing gear. Along the coast, Alaska's 0-3 nautical mile (nm) state-waters band is only about 5.6 km wide, so a single cell can span nearly the entire state-waters zone.⁸
- In state waters, averaging in the model can hide sensitive habitats. Corals, sponges and other sensitive habitat features occur in state waters, but the model assumes each sediment type is spread evenly across the cell and averages the recovery times of every habitat feature in the cell (e.g., boulders, cobble, anemones, sponges, and very long-lived species such as coral) into a single recovery estimate. Because one cell can span nearly the entire state-waters band, a coral or sponge

⁵ Alaska Board of Fisheries, Summary of Actions, Statewide Finfish and Supplemental Issues Meeting, Mar. 17-21, 2026: Board audio, Proposals 163-165 (Mar. 20, 2026), https://www.newsrelease.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/state/psoa_3-21-26.pdf.

⁶ Id. (statements of ADF&G Commissioner Vincent-Lang, Chair Carlson-Van Dort, and Board Member Wood).

⁷ NMFS Alaska Region, 2028 Essential Fish Habitat 5-year Review Plan (Nov. 2025, rev. Dec. 2025) (NPFMC Agenda Item D2), sec. 2.3, at 15 <https://meetings.npfmc.org/CommentReview/DownloadFile?p=d54b47d7-ae7e-418d-ad7b-209beb7023ec.pdf&fileName=D2%202028%20EFH%205-year%20Review%20Plan%20Discussion%20Paper.pdf>.

⁸ Smeltz, T.S., et al. (2019). A seascape-scale habitat model to support management of fishing impacts on benthic ecosystems. *Canadian Journal of Fisheries and Aquatic Sciences*, 76(10)

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garden is averaged together with the rocks and cobble around it, so a cell containing corals that the model assumes can take up to 50 years to recover can be scored as recovering in less than 5 years.⁹

- It does not account for any long-lived habitat features, such as corals and sponges, occurring in waters shallower than 300 meters, which would include many state waters.¹⁰ Prince William Sound averages about 190 meters deep.¹¹ In the Gulf of Alaska, 93% of long-lived coral records are shallower than 300 meters.¹²
- The model's mapping is built for federal waters and offshore habitat. It maps habitat only as five sediment types (mud, sand, granule/pebble, cobble, and boulder). It does not map eelgrass, kelp, rockweed, estuaries, tide flats, or other nearshore habitat that supports herring spawning, juvenile salmon, and juvenile groundfish.
- The NMFS fishing effects analysis only evaluates impacts on the essential fish habitat of federally managed groundfish and crab, and its fishing effort comes only from vessel tracks (VMS) of federally managed commercial vessels. The NMFS analysis does not address impacts on habitats essential to Pacific halibut, lingcod, salmon, Pacific herring, or forage fish. These species and their habitats are vitally important for subsistence, commercial, sport, and personal-use fisheries in Alaska and they are taken in substantial quantities as bycatch in federal groundfish trawl fisheries.¹³
- The model's susceptibility and recovery values come from a published review of gear-effects studies framed around Northeast U.S. gears and seabed types, not Alaska- or nearshore-specific data.¹⁴

Finally, the current version of the FE Model has not received any independent external review, such as by the NMFS's Center for Independent Experts (CIE), even though the Council's own Scientific and Statistical Committee (SSC) recommended a CIE review in 2022.¹⁵ The only CIE review was done in 2004 and only examined the Long-term Effects Index (LEI) model, the predecessor to the FE Model. In that case, one reviewer found that much of the necessary input data, including substrate, was lacking, and that recovery rate estimates were particularly weak.¹⁶ Oceana described these gaps, and more in our January 2026 comments to the Council, which were also submitted to the Board (RC143).¹⁷

⁹ Supra note 8

¹⁰ RC143, supra note 9, at 4

¹¹ Wang, et al. (1997). A three-dimensional tidal model for Prince William Sound, Alaska. In *Computer Modelling of Seas and Coastal Regions III*, 95, WIT Press, doi:10.2495/CE970101

¹² RC143, supra note 8, at 4-5 & tbl. 1

¹³ Supra note 2; Supra note 8; NMFS, Fisheries of the Exclusive Economic Zone off Alaska; Essential Fish Habitat Amendments, 89 Fed. Reg. (July 19, 2024) (FR Doc. 2024-15930), response to Comment 5 ("Halibut and State-managed commercial species are not targeted FMP species and do not have designated EFH").

¹⁴ Grabowski, J.H., et al. (2014). Assessing the vulnerability of marine benthos to fishing gear impacts. *Reviews in Fisheries Science & Aquaculture*, 22(2), 142, doi:10.1080/10641262.2013.846292; Zaleski et al., supra note 2; NPFMC, EFH Fishing Effects Discussion Paper (Feb. 2023)

¹⁵ NPFMC, Scientific and Statistical Committee Final Minutes (Feb. 2022), at 26, quoted in RC143, supra note 8, at 2 n.5.

¹⁶ Center for Independent Experts (K. Drinkwater, Chair). 2004. Summary Report, Review on Evaluation of Fishing Activities that May Adversely Affect Essential Fish Habitat in Alaska, quoted in RC143, supra note 9, at 3 n.13.

¹⁷ RC143, supra note 9.

The FE Model Misses Most Shallow Coral and Sponge Habitat, Even in Federal Waters

The FE Model's blind spots are not only limited to state waters. The model defines "long-lived" coral and sponge habitat only as cobble or boulder substrate deeper than 300 meters. Habitat outside of that narrow depth-and-substrate combination is assigned to one of the model's shorter recovery bands (under 1, 1-2, 2-5, or 5-10 years) rather than the 10-to-50-year band reserved for recognized long-lived habitat. No other habitats are treated as long-lived habitat in the model, regardless of the actual biology of what's there.¹⁸

Oceana's analysis of the National Oceanic and Atmospheric Administration's (NOAA) National Deep-Sea Corals and Sponges Database¹⁹ shows how large that blind spot is:

Taxonomic Group	AK EEZ total records	% ≤300m (AK EEZ)	GOA records	% ≤300m (GOA)
All coral records	506,607	68.6%	118,851	93.1%
All sponge records	487,087	50.0%	83,479	40.6%

Table 1. NOAA National Deep-Sea Corals and Sponges Database records in the Alaska Exclusive Economic Zone (EEZ) and Gulf of Alaska, and the share recorded at 300 m or shallower. The Fishing Effects Model defines long-lived coral and sponge habitat as occurring only deeper than 300 m.

In the Gulf of Alaska specifically, 93% of all coral records and 41% of all sponge records occur at 300 meters or shallower. Separately, 99% of Gulf of Alaska coral records are long-lived species, and 93% of those long-lived records occur in waters shallower than 300 meters, compared to 93% and 70% across the broader Alaska EEZ.²⁰ Nearly all Gulf of Alaska coral records, in other words, are long-lived corals in shallower waters – a depth range the model universally treats as tolerant to disturbance-with a short recovery time. State waters, extending only to three nautical miles from shore, are largely within this shallow band. This is an additional reason why the FE model cannot help the Board in assessing fishing impacts in state waters.

Coral and Sponge Habitat Is Long-Lived, Slow to Recover, and Supports Important Fisheries

A 2002 National Academy of Sciences consensus study, representing hundreds of studies worldwide, concluded that bottom trawling reduces the complexity, productivity, and three-dimensional structure of seafloor habitats by smoothing bedforms, eliminating bottom roughness, and destroying structures like sponges and corals. These findings led the Academy to recommend closed areas, gear modifications, and reductions in trawl effort.²¹

¹⁸ Id. at 4.

¹⁹ RC143, supra note 9, at 5 & tbl. 1 (analyzing NOAA, National Database for Deep-Sea Corals and Sponges, <https://deepseacoraldata.noaa.gov/>). The database records presence only. See id.

²⁰ Id. at 4-5.

²¹ National Research Council. 2002. Effects of Trawling and Dredging on Seafloor Habitat, ch. 7, at 65-68, <https://doi.org/10.17226/10323>; RC143, supra note 9.

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The coral and sponge structures that trawling destroys can take decades to form and even longer to recolonize or recover once damaged. A single experimental bottom trawl pass on the eastern Gulf of Alaska outer shelf in 1996 displaced boulders and damaged and removed sponges and sea whips. A follow-up survey thirteen years later found sponge density still 31.7% lower and incidence of damage was 58.8% higher than in untrawled areas at the same site.²²

This matters to Alaska's state-managed fisheries. Alaska Fisheries Science Center (AFSC) research has repeatedly documented rockfish, including rougheye, shortraker, and Pacific ocean perch, sheltering in and around coral and sponge structures. Submersible surveys in the Aleutians found rockfish occurring disproportionately near living coral,²³ researchers documented rockfish closely associated with red tree coral colonies in the Gulf of Alaska,²⁴ and a submersible survey at one site in the northeastern Gulf of Alaska found that all 82 juvenile red rockfish (a group that includes Pacific ocean perch, shortraker, rougheye, and other red and orange rockfish) observed were closely associated with sponges.²⁵ Nearshore kelp beds with structurally complex substrate in south-central Alaska support juvenile and adult Pacific cod and rockfishes, and lingcod spawn on nearshore rocky reefs, where males guard the egg nests.²⁶ Shallow, nearshore structured habitat is not incidental to Alaska's groundfish fisheries; it is nursery and forage habitat for some of the same stocks Alaska fisheries depend on.

Bycatch Data Show Pelagic Trawl Gear Contacts and Damages Seafloor Habitat

ADF&G's data show that the pollock pelagic trawl fishery in the state waters of Prince William Sound recorded 230,166 pounds of rockfish bycatch - an estimated 14,100 individual fish - from 2010 through 2023. In 2014 alone it recorded 67,446 pounds, exceeding the rockfish bycatch limit and resulting in an early closure of the fishery. The catch was generally about 86% shortraker and 13% rougheye.²⁷ ADF&G classifies these as nonpelagic rockfish, mostly bottom-dwelling, long-lived fish of rocky and boulder habitat, and NOAA lists shortraker as living more than 100 years.²⁸ ADF&G has stated it has conservation concerns for rockfish in Prince William Sound, and its 2026 groundfish outlook notes that the rockfish guideline

²² Freese, L., et al. (1999). Effects of trawling on seafloor habitat and associated invertebrate taxa in the Gulf of Alaska. *Marine Ecology Progress Series*, 182, 119; Malecha, P.W., & Heifetz, J. (2017). Long-term effects of bottom trawling on large sponges in the Gulf of Alaska. *Continental Shelf Research*, 150, 18

²³ Stone, R.P. (2014). The Ecology of Deep-Sea Coral and Sponge Habitats of the Central Aleutian Islands of Alaska. NOAA Professional Paper NMFS 16, at 23-24 & tbl. 10, <https://www.st.nmfs.noaa.gov/spo/SPO/pp16.pdf> (juvenile rockfishes: odds ratio 26.2 of co-occurring with corals); NMFS, A Summit on the Role of Deep-Sea Corals and Sponges as Habitat for Managed Species off the West Coast and Alaska, Summary Outcomes, at 2 (Mar. 19, 2015) (PFMC Informational Report 5).

²⁴ Krieger, K.J., & Wing, B.L. (2002). Megafauna associations with deepwater corals (*Primnoa* spp.) in the Gulf of Alaska. *Hydrobiologia*, 471, 83, doi:10.1023/A:1016597119297.

²⁵ Freese, J.L., & Wing, B.L. (2003). Juvenile red rockfish, *Sebastes* sp., associations with sponges in the Gulf of Alaska. *Marine Fisheries Review*, 65(3), 38

²⁶ Hamilton, J., & Konar, B. (2007). Implications of substrate complexity and kelp variability for south-central Alaskan nearshore fish communities. *Fishery Bulletin*, 105, 189 (kelp beds “seasonally important” to rockfishes and codfishes); ADF&G, Lingcod (2007), <https://newsrelease.adfg.alaska.gov/static/education/wns/lingcod.pdf> (spawning on “rocky reefs”; males guard the nests).

²⁷ ADF&G, Prince William Sound Pollock Directed Pelagic Trawl Fishery, harvest table 2010-2026, https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareapws.pws_groundfish_pelagic_trawl_harvest

²⁸ ADF&G, Nonpelagic Rockfish (rev. 2017), <https://www.adfg.alaska.gov> (nonpelagic rockfish are “bottom-dwelling species found on or near the ocean floor, usually in rocky or boulder-strewn habitat”); NOAA Fisheries, Shortraker Rockfish Research in Alaska (maximum age over 120 years).

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harvest level was exceeded in 2022 and 2023.²⁹ Such significant bycatch of nonpelagic species in a pelagic trawl fishery tells a clear story: this gear affects bottom habitat and bottom-dwelling species.

Invertebrate bycatch tells the same troubling story. Corals, sponges, sea whips, and sea pens are fixed to the seafloor, and sea stars and crabs live on it. Gear fishing in the water column does not regularly collect them, yet pelagic trawl vessels have recorded catching large amounts of these creatures in federal waters:

Taxonomic Group	Alaska-wide, 1993-2025 (lbs)	Gulf of Alaska, 1993-2025 (lbs)	Alaska-wide, 2006-2025 (lbs)	Gulf of Alaska, 2006-2025 (lbs)
Corals (incl. bryozoans)	99,531	734	79,065	296
Sponges	29,287	400	9,346	381
Sea stars	1,337,880	39,513	761,852	27,257
Crabs	460,574	3,463	46,093	2,070

Table 2. Observed pelagic trawl bycatch of selected invertebrates in federal waters, in pounds. The Gulf of Alaska includes NMFS Areas 610-650. Coral weights include bryozoans because of how federal observers identify corals and bryozoans. Crabs include only true-crab categories and exclude hermit crabs.³⁰

Moreover, these figures are observed amounts only. In the Gulf of Alaska, 72% of pelagic trawl fishing effort from 2016 to 2020 was not observed,³¹ so the observed totals understate the true extent of the impact.

Kodiak pelagic trawl operators told the Board in March that they avoid the seafloor in Gulf of Alaska and Prince William Sound state waters because the bottom is extremely rocky and they do not want to risk damaging or losing their gear.³² The catch records contradict this. The shorttraker and rougheye catch means the gear is likely on or near the bottom in the areas operators call too rocky to fish. And catching sea stars, corals and sponges in federal waters (Table 2) means the gear touched the seafloor.

²⁹ ADF&G, Staff Comments, Regional Information Report 5J24-09 (Nov. 2024) (RC2), at 8-9 (150,000 lb rockfish bycatch GHL exceeded in 2022 and 2023; Proposal 5 “a critical tool to conserve rockfish in PWS”), https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/pws/rc2_staff_comments_12-3-24.pdf; ADF&G, 2026 Prince William Sound and Cook Inlet Groundfish Outlook (“growing concerns about the status of rockfish stocks”), https://www.adfg.alaska.gov/static/fishing/PDFs/commercial/centralregion/2026_pws_ci_groundfish_outlook.pdf.

³⁰ Oceana’s analysis of observed pelagic trawl coral, sponge, sea star and crab bycatch, 1993-2025 (federal waters) based on AFSC invertebrate bycatch data: [Observer data map](#).

³¹ Supra note 2.

³² Chandler, J., for the Kodiak trawl catcher vessel fleet, Letter to the Alaska Board of Fisheries (Mar. 17, 2026) (RC039) (“State waters in the GOA and PWS are extremely rocky”; “we do not want to risk damaging or losing our gear”).

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Board-Generated Proposal on Pelagic Trawl Gear
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Most State Waters Are Open to Pelagic Trawl Gear

Figure 1 (attached) shows year-round trawl restrictions off Alaska and highlights areas in state waters open to pelagic trawl gear. Only a few areas are closed to pelagic trawling, including parts of Prince William Sound and Port Fidalgo, the Bristol Bay and Port Moller area, and Southeast Alaska. Cook Inlet and portions of the Kodiak and Alaska Peninsula coasts are closed to bottom trawling but open to pelagic trawl gear. In fact, most state waters remain entirely open to pelagic trawling.

What We Ask of the Board

We ask the Board to follow the approach Chair Carlson-Van Dort described in March 2026: develop a Board-generated proposal, with language at the October 28-29, 2026 work session, noticed under the Administrative Procedure Act and scheduled to be heard in the next cycle. That proposal should use all available science and data relevant to Alaska state waters and to how pelagic trawl gear operates, rather than relying on the federal FE Model, to accomplish what Proposals 163, 164, and 165 would have done:

- Require ADF&G-approved seafloor contact monitoring systems on all pelagic trawl vessels in state waters.
- Treat pelagic trawl gear in state waters as bottom contact gear, subject to the closures that apply to bottom contact gear, unless the operator shows, through the ADF&G-approved monitoring systems, that it operates entirely in the water column.
- Require ADF&G-approved salmon excluders on pelagic trawl gear used in the commercial groundfish harvest in state waters.

Sincerely,



Lauren Hynes
North Pacific Campaign Manager and Marine Scientist

Attached: Figure 1

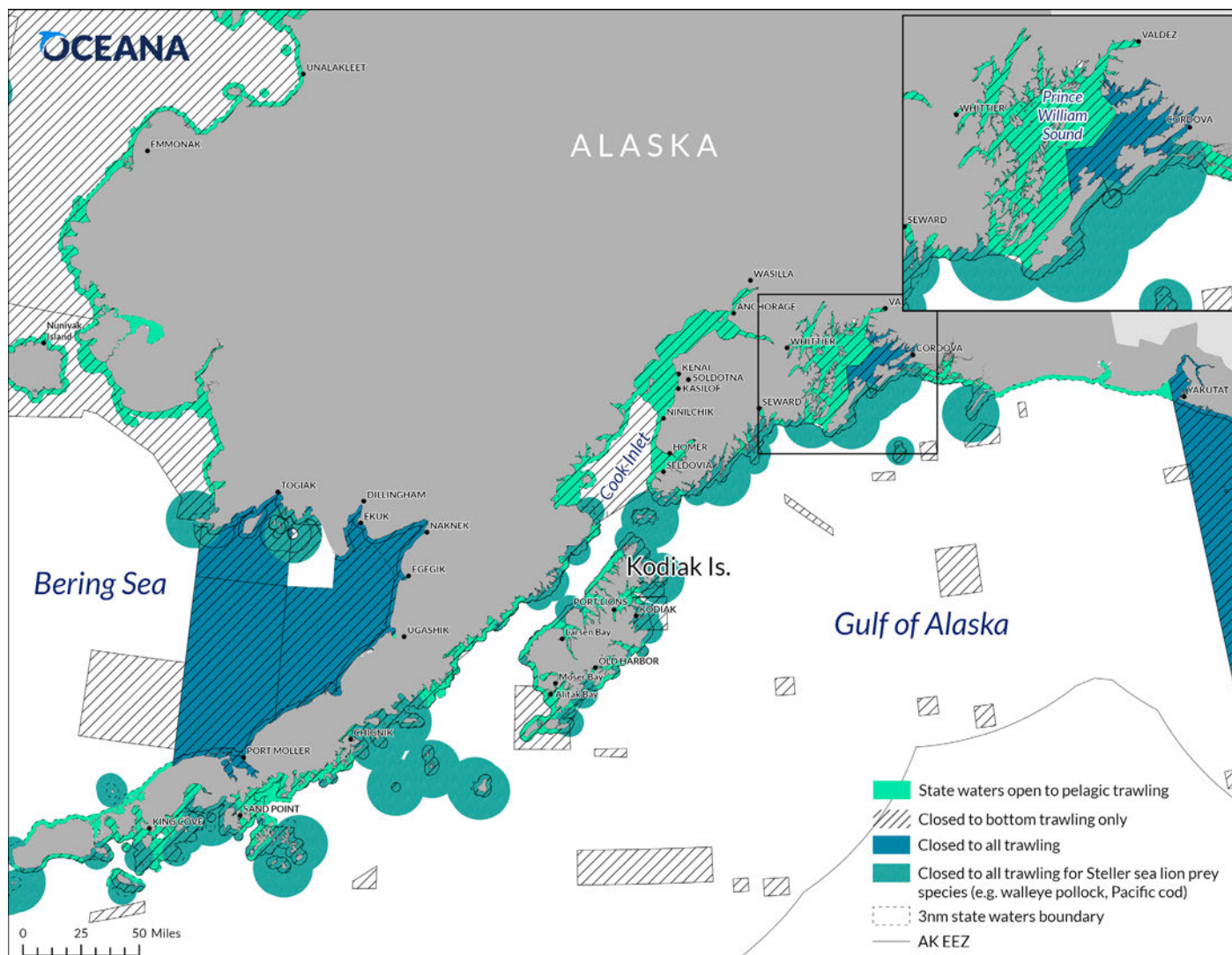


Figure 1. Year-round trawl restrictions showing large areas open to pelagic trawl gear in state marine waters (0-3 nautical miles) including east of Yakutat, Prince William Sound, Cook Inlet, along the Alaska Peninsula, and Kodiak Island. And all areas in white inside the Alaska EEZ (3 to 200 nm) are open to trawling.



October 12, 2026

Alaska Board of Fisheries
 Marit Carlson-Van Dort, Chair
 Via email: dfg.bof.comments@alaska.gov

RE: Oppose ACRs 3, 6 - 10, 13

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (BOF) October work session in Anchorage. **The Pacific Seafood Processors Association (PSPA) does not consider any of the out-of-cycle Agenda Change Requests (ACRs) to have met the ACR criteria contained in state regulations (5 AAC 39.999). We also want to highlight specific opposition to ACRs 3, 6 – 10, and 13.**

PSPA is a nonprofit seafood trade association comprised of major Alaska seafood processing companies that operate in 22 coastal communities across Alaska. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska seafood each year and include shore-based processors that serve fleets dependent on commercial salmon fisheries from Southeast to the Aleutians.

ACR 3 would reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually. There is no scientific basis provided for a reduction and the amount proposed is arbitrary, nor is there any metric that the BOF is considering that would track the effectiveness of such measures. Reducing hatchery production across the state by ~95% would be devastating to all fisheries dependent on hatcheries, including commercial, recreational, and subsistence, without any evidence of a conservation benefit. At the same time, Asia would continue to maintain their production and Russia would continue to increase theirs. ACR 3 will have certain and measurable negative impacts without any measurable benefit.

Similar proposals continue to be submitted to the BOF without any new information or recognition of the significant research the State has led to understand actual impacts of supplementing wild runs with hatchery production. We support the Board's efforts to implement a process by which hatchery proposals could be considered by the Board that eliminates the constant duplication of proposals without any additional information.

ACRs 6 – 10 would reintroduce the South Alaska Peninsula proposals to severely limit fishing time in the June and post-June seine and gillnet sockeye fisheries (ACRs 6-8) and to reduce net size (ACRs 9 – 10). Please reference our comments on these proposals from the February 2026 BOF meeting. There is nothing to warrant moving from an on-the-water management system that can limit fishing effort in near-real time when chum are actually on the fishing grounds, to a system that foregoes a significant amount of sockeye harvest due to fixed closures. Chum and sockeye abundance and distribution change

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 202-661-6220

constantly over time — both annually and over a season, month, and day — and the current approach is the only way to constantly monitor and reduce chum harvest in response to those changing conditions. In addition, the circumstances that were present at the time of the initial Board action have changed, with increases to both summer and fall chum in 2026, including the third largest fall chum run on the Yukon River in the last 25 years.

The input controls in the ACRs intended to limit effort by creating inefficiencies and additional costs to catch the same amount of fish are a blunt tool that ignores the variations in run timing and location. These types of controls may be warranted in some cases but are much less effective than the current system and management plan, which continues to provide the ADFG Commissioner with significant inseason authority. To remind of the importance of the Area M fishery to the Aleutians East Borough, AEB reports that 32% of the fish taxes they received in 2022 were from salmon, 80% of the private sector jobs in the borough communities are seafood-related, and the majority of Area M salmon permits are owned and used by Alaska residents.¹

ACR 13 would require Chinook salmon retention statewide. While it is clear the intent is to improve reporting, and PSPA strongly supports that goal, we are concerned this proposed regulation would directly increase Chinook mortality and undermine Chinook conservation efforts currently in place in several commercial fisheries. The commercial troll fishery in Southeast has a minimum size limit for a purpose, and prohibition on release of Chinook would directly change the size and age composition of commercial harvest, which is subject to treaty obligations with Canada. Prohibition on Chinook retention is used in other commercial salmon fisheries in Southeast, Kodiak, and the South Alaska Peninsula, as a conservation tool and to avoid incentivizing Chinook catch in these fisheries. The cascading effects of such a regulation statewide are worrisome.

In sum, please oppose these ACRs and consider whether any of the ACRs truly meet the regulatory requirements for an out-of-cycle request. We note the ADFG staff comments that do not believe they do. Thank you for the opportunity to comment.

Sincerely,



Julie Decker
PSPA, Wrangell

¹ AEB residents averaged 72% of the Area M purse seine salmon permits fished between 1980-2020. Source: Northern Economics, Inc. The Importance of Fisheries to the Aleutians East Borough. Prepared for Aleutians East Borough, March 2022.

Pauloff Harbor Tribe

P.O. Box 97
Sand Point, AK 99661

Phone: (907)383-6075
Fax: (907)383-6094

October 8, 2026

Alaska Board of Fisheries

RE: Opposition to Acceptance of Agenda Change Requests 6, 7, 8, 9 and 10

Dear Chair and Members of the Board:

On behalf of the Pauloff Harbor Tribe, I respectfully request that the Alaska Board of Fisheries decline to accept Agenda Change Requests (ACRs) 6, 7, 8, 9 and 10 for consideration outside the regular Board cycle.

These requests concern major changes to commercial salmon fishing time, gear dimensions and management restrictions in the Alaska Peninsula and Aleutian Islands Area. These subjects were recently considered during the regular February 2026 Alaska Peninsula, Aleutian Islands and Chignik meeting. They are not new or unforeseen issues. ACRs 6 and 7 seek to reinstate the same 10-day June closure, while ACRs 8, 9 and 10 seek to reinstate other measures that were already debated and acted upon during that meeting.

The ACR process should not be used as a substitute for the regular proposal process or as a method of reconsidering proposals after the public meeting has concluded. The fact that previously adopted regulations were later vacated does not, in itself, establish that an unforeseen effect has occurred in a fishery or that an error exists in the wording or operations of an existing regulation. Concerns about the legal review or subsequent handling of the Board's actions should be addressed through the appropriate legal and administrative processes.

Although the requests are described as conservation measures, they would place substantial new restrictions on one fishing area and one group of fishermen. Closing fishing time, reducing gillnet depth and reducing seine size would directly affect harvest opportunities and the economic viability of Area M fishing families and communities. These changes have significant allocative effects that deserve the complete public process provided during a regular-cycle meeting.

The applicants have not demonstrated sufficiently compelling new biological information establishing that these specific Area M restrictions must be adopted before the next regular cycle. The conservation status of Western Alaska Chinook and chum salmon was known and extensively discussed during the February 2026 meeting. The relationship between Area M harvests, the stock composition of those harvests and returns to individual AYK river systems

remains complex. Those questions require complete genetic, harvest, escapement and economic analyses rather than expedited action through the ACR process.

If additional conservation measures are needed for AYK salmon, the Board should evaluate the entire migratory pathway and all fisheries harvesting those stocks. Singling out Area M without examining harvests occurring after salmon leave Area M does not establish that the proposed restriction will provide a measurable benefit to AYK spawning returns. Conservation responsibility should be based on reliable stock-specific information and applied fairly across affected fisheries.

Considering ACRs 6 through 10 together is particularly important because their cumulative effect would be substantial. The proposed June closure, King-salmon restrictions, gillnet-dept reduction and seine-size reduction could collectively change fishing opportunity and allocation throughout the Alaska Peninsula salmon fishery. Changes of this magnitude require advance notice, full department analysis, meaningful participation by affected communities and consideration during the regular Board cycle.

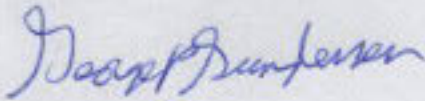
For these reasons, the Pauloff Harbor Tribe respectfully request that the Board:

1. Decline to accept ACRs 6, 7, 8, 9 and 10;
2. Recognizes that ACRs 6 and 7 are duplicate requests concerning Proposal 127;
3. Recognize that the underlying issues were known and considered during the regular February 2026 meeting;
4. Determine that the requests have substantial allocative effects and do not demonstrate compelling new information justifying out-of-cycle consideration; and
5. Require future proposed changes to Area M fishing time, gear and management plans to proceed through the applicable regular-cycle proposal process.

The Pauloff Harbor Tribe recognizes the importance of protecting salmon stocks and maintaining sustainable fisheries throughout Alaska. However, conservation decisions must be supported by sound science, meaningful public participation, and fair consideration of the impacts on all affected fishing communities.

Thank you for considering these comments.

Respectfully submitted,



George P. Gundersen
President

Pauloff Harbor Tribe

P.O. Box 97
Sand Point, AK 99661

Phone: (907)383-6075
Fax: (907)383-6094

October 8, 2026

Alaska Board of Fisheries

RE: Comments on Agenda Change Requests 11, 12 and 13

Dear Chair and Members of the Board:

On behalf of the Pauloff Harbor Tribe, the Tribal Council submits the following comments regarding Agenda Change Requests (ACRs) 11, 12, and 13 for the 2026-2027 Board of Fisheries meeting cycle.

The Tribe recognizes the importance of conserving Alaska's salmon resources while maintaining sustainable commercial and subsistence fishing opportunities for coastal communities. Fisheries management decisions have significant economic, cultural, and subsistence impacts on our Tribal members and the communities of the Alaska Peninsula.

ACR 11 – Oppose

The Pauloff Harbor Tribe opposes ACR 11, which requests reconsideration of the Board's February 2026 action on Proposal 135 concerning Chinook salmon retention in the Alaska Peninsula and Chignik areas.

The Board considered this matter during its regularly scheduled February 2026 meeting and adopted the regulation following public testimony and deliberation.

The Tribe believes the recently adopted regulation should be evaluated using reliable biological information before the Board considers reversing its decision. ACR 11 does not demonstrate sufficient new evidence of an urgent conservation concern requiring reconsideration outside the regular regulatory cycle.

The Tribe respectfully requests that the Board deny ACR 11.

ACR 12 – Support

Allow commercial salmon fishing with set gillnet gear in the Southeastern District Mainland (SEDM) concurrent with commercial fishing periods in the Chignik Management Area.

The Pauloff Harbor Tribe supports ACR 12, submitted by Ben Mobeck Sr., requesting that South Alaska Peninsula set gillnet fishermen in the Southeastern District Mainland (SEDM) be allowed to fish concurrently with commercial salmon fishing periods in the Chignik Management Area.

South Alaska Peninsula set gillnet fishermen have experienced significant reductions in harvest and fishing opportunities in recent years. According to ACR 12, June sockeye salmon harvests in 2024 and 2025 were 65 percent below the previous five-year average, while the June 2026 harvest was 81 percent below the previous ten-year average.

The Tribe believes that SEDM set gillnet fishermen should have reasonable fishing opportunities when the Chignik Management Area is open to commercial salmon fishing, consistent with applicable conservation requirements. Both fisheries contribute to the same regional fishing economy, supporting fishermen, families, local businesses, and coastal communities that depend on commercial fishing for their livelihoods.

Continued restrictions on SEDM set gillnet fishing opportunities, particularly when commercial fishing is occurring in the neighboring Chignik Management Area, creates concerns about fairness and the economic sustainability of small fishing operations.

The significant reductions in harvests reported in recent years raise concerns about the long-term viability of the South Alaska Peninsula set gillnet fleet. Further delays in addressing these concerns could result in additional economic hardship and the loss of locally based fishing operations.

The Pauloff Harbor Tribe recognizes the importance of conservation and responsible fisheries management. However, the Tribe believes that providing reasonable fishing opportunities to SEDM set gillnet fishermen when Chignik is fishing deserves consideration before the next regular Board cycle.

For these reasons, the Pauloff Harbor Tribe respectfully requests that the Alaska Board of Fisheries accept ACR 12 for consideration outside the regular regulatory cycle.

ACR 13 – Oppose

The Pauloff Harbor Tribe opposes ACR 13, which proposes establishing a statewide Chinook Salmon retention and disposition reporting standard for commercial salmon fisheries.

While the Tribe recognizes the importance of accurate Chinook salmon harvest reporting, the proposed statewide mandatory retention requirement does not adequately account for differences among fishing gear types, regional fisheries, and existing management practices.

The Tribe is particularly concerned that the proposed regulation could conflict with Chinook salmon release requirements adopted for Area M during the February 2026 Board meeting.

The Tribe supports improving Chinook salmon reporting and biological data collection. However, a statewide regulation of this scope warrants a thorough review through the regular regulatory process, including participation by affected fishing communities and tribes.

The Tribe respectfully requests that the Board deny ACR 13.

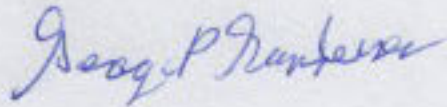
Conclusion

The Pauloff Harbor Tribe respectfully requests that the Alaska Board of Fisheries:

1. Decline to accept ACR 11
2. Accept ACR 12 for consideration
3. Decline to accept ACR 13

The Tribe appreciates the opportunity to provide comments.

Sincerely,



George P. Gundersen
President

Name: Dale Pedersen

Myself

Community of Residence: Sand point

Members of the Board, fellow Alaskans, and everyone who cares about the future of our salmon:

I'm here to talk about why it's a bad idea to do away with the adaptive management plan that Area M fishermen and managers have built and proven over the last several seasons.

This plan is not a loophole. It is one of the most successful in-season conservation tools we have seen in Alaska salmon management. Starting in 2022, Area M seiners created a voluntary program of test sets, real-time reporting, localized stand-downs, and fleet coordination. When the data and conditions showed elevated chum risk, the fleet stood down—not because someone forced them, but because they agreed to reduce impacts while still targeting sockeye. The Board formalized it in 2023 with clear chum harvest triggers.

The results speak for themselves. Since the program began, average June chum harvest has been about 339,000 fish—roughly a 50 percent reduction compared with the five-year average before the program, and a 32 percent reduction compared with the ten-year average. The seine fleet has collectively stood down an average of 291 hours of fishing time each season since 2023.

Participation has been unanimous through binding agreements. ADF&G staff have acknowledged on the record that the program was working. In low-abundance years the fleet stayed well below the trigger thresholds and still managed to keep the fishery viable.

That is adaptive management in action: informed, flexible, and responsive to what is actually happening on the grounds that day and that week.

Replacing it with fixed calendar cuts and the removal of the triggers does the opposite. Compressing the fishing window reduces the time and flexibility needed to stand down strategically when chum are moving and to fish when they are not. As Board members themselves have noted, without the adaptive framework and its incentives for cooperation, the voluntary system that produced these reductions is likely to fall apart. You can end up with less effective conservation and higher risk of chum harvest, not lower.

These communities—Sand Point, the Aleutians East, and the families who live there—depend on this fishery. They have already given up significant time, opportunity, and income to achieve measurable reductions in chum. Fixed, blunt restrictions that ignore real-time conditions threaten both the conservation gains and the economic foundation of these places without guaranteeing better outcomes for Western Alaska stocks.

Alaska's Sustainable Salmon Fisheries Policy calls for management that is responsive to run strength, uses the best available information, and balances conservation with sustained yield. The adaptive plan does exactly that. It was built by fishermen working with managers, it has delivered documented results, and it can be improved further.

Doing away with it would discard a working conservation tool in favor of less flexible rules that risk undoing the progress. Let's keep and strengthen what is already working. Thank you

Dear Board of Fisheries members-

I am writing in support of ACR #5. While I am involved with the issue through my work with Alaska Sea Grant, these comments represent me alone.

I have been monitoring for European green crab (EGC) on the beaches of Mitkof Island near Petersburg and conducting extensive outreach and education on the issue since the Metlakatla Indian Community first found them on their beaches in 2022. I have staffed informational booths at festivals in Petersburg and Wrangell for the past three summers, have trained field-going US Forest Service staff in Petersburg, Wrangell and Ketchikan in EGC identification, conducted outreach talks and interviews with local media outlets, and led monthly discussions with the people on the ground in southern southeast doing the hard work of trying to trap the EGC invading their beaches. We have distributed over 6,000 stickers (see image below) providing EGC identification and reporting information in southeast Alaska. I also helped coordinate a training for Ketchikan and Prince of Wales residents in monitoring protocols for EGC. This training included instruction in how to apply for and report on the Aquatic Resource Permit required to conduct this monitoring.

The challenge with stemming the spread of EGC in Alaska extends beyond addressing known populations. Perhaps an even bigger problem is that we do not know which beaches have been colonized and which have not. Southeast Alaska has thousands of miles of coastline and relatively few residents, making assessing the extent of the EGC invasion very difficult and expensive. Unfortunately, current staffing at the state of Alaska comprises one individual responsible for all terrestrial, marine and freshwater invasive species in the state. While their efforts have been laudable, this single staff person is no match for the invasive capability of EGC and the vast remote shoreline of southeast Alaska.

Given these limited State resources, we have turned to the public, begging them to search for EGC when they visit remote beaches and let us know if they find any. The question we are asked most often when we make this request is, "What should I do when I find them?" Under the current regulatory system, our answer is to take a picture and report it, or take one crab and bring it to ADF&G for identification – and then trust that the single employee with a tiny budget will someday arrive and eradicate the population. I believe we can better leverage the interest of these residents who understandably care about the native crab, salmon and other species that depend on our beaches.

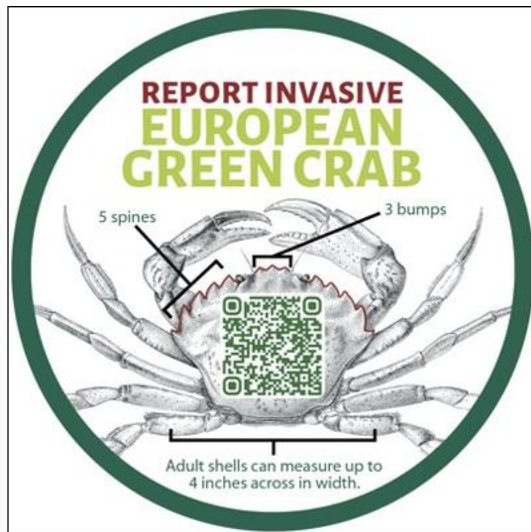
The reasons most often given for limiting the public's response in this way are not convincing in this situation for the following reasons:

1. Past prohibitions against harvest and consumption of invasive species in the state enacted by the Board of Fisheries have been in response to freshwater invaders that are unable to transport themselves to new locations. Conversely, green crab, which can release hundreds of thousands of eggs up to twice a year to drift on the currents and colonize new beaches are far more capable of spreading themselves than humans could ever be. Prohibiting humans from transporting dead EGC will not prevent their spread.
2. The likelihood of the accidental over harvest of native species is minimal, particularly given the vastness of southeast Alaska shorelines and how few people reside there. As there are currently no regulations for native shore crab harvest in Southeast Alaska, we can assume there is not a conservation concern about these species. In addition, just as visitors and residents are capable of identifying various salmon species when they harvest them, there is no reason to think they will be incapable of identifying EGC. I have seen multiple elementary students correctly identify EGC vs. purple shore crab, helmet crab, red rock crab and Dungeness crab. The people of Alaska can correctly identify an EGC with minimal education, much of which we have already provided in southern southeast Alaska.
3. The statement that a member of the public can simply acquire an aquatic resource permit to harvest EGC has not held up in my experience over the last four years. The permitting process is unfamiliar, designed for other purposes, and requires after-the-fact reporting that most resident volunteers would find burdensome.
4. Finally, the statement that EGC do not have food value is untrue. As just one example, at one of the outreach events mentioned earlier, I ran into a biologist from Spain, who was excited to see my materials and told me about how they use them whole to flavor the broth in paella. For more recipes, see <https://seagrant.unh.edu/our-work/invasive-species/nh-green-crab-project/green-crab-recipes>

This ACR request does not represent the ideal response to the problem of European green crab invading southeast Alaska. Ideally, the state of Alaska might respond similarly to the state of Washington, with an emergency declaration and millions of dollars to help incentivize targeted trapping efforts that include training, careful data collection, and rigorous analysis. Absent a concerted effort by the state such as this, allowing the willing public to harvest EGC when they find them seems like the next best step, building on the successful outreach already conducted in southeast Alaska. Why not allow these educated and motivated citizens to help in a situation that no one can argue we currently have under control?

Thank you for your consideration and I look forward to continued discussion on how all parties can work together to solve this problem.

Sincerely,
Sunny Rice
PO Box 1736
Petersburg, AK 99833
907-518-1432





Submitted via online portal

October 13, 2026

Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, Alaska 99811

Re: Board generated proposal regarding pelagic trawl gear in state waters

Dear Chair Carlson-Van-Dort and Board Members,

SalmonState thanks you for providing the opportunity to submit comments for the work session of the Board of Fisheries (“Board”) to be held October 28-29. The Board will be holding a work session after the Joint Protocol Committee meeting held with the members of the North Pacific Fishery Management Council (“NPFMC”) regarding trawl activities in federal and state waters. The state has jurisdiction over the 0-3 nautical miles, which includes vital nearshore habitat for species important to subsistence, recreation, and commercial fisheries, as well as foundational food web organisms. SalmonState implores the Board to use the information gathered at the joint protocol committee meeting and develop a board-generated proposal that provides actionable enforcement mechanisms to bring the pelagic trawl fishery under compliance with state regulation.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a salmon state by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

I. Pelagic trawl impacts on seafloor habitat warrants timely action

There are extensive studies and research that show trawl gear that drag the bottom of the ocean floor are highly destructive, contribute to climate change, and are, metaphorically, like clear cutting virgin forests.¹ In recent years, multiple countries highly dependent economically on

¹ *Bottom trawling releases as much carbon as air travel, landmark study finds*, The Guardian, March 17, 2021, <https://www.theguardian.com/environment/2021/mar/17/trawling-for-fish-releases-as-much-carbon-as-air-travelreport-finds-climate-crisis>

commercial fishing such as Chile,² Greece,³ the United Kingdom,⁴ and Sweden,⁵ have banned or are phasing out bottom trawling in their waters to protect important habitat and species.

A report in front of the NPFMC in April 2022 indicated that “pelagic” trawl gear made contact between 40% and 100% of the time it was deployed.⁶ Studies in the Eastern Bering Sea show that 80-100% of walleye pollock are found from 0 - 3 meters (0 - 9.8 feet) from the seabed.⁷ Larger pollock are found at or near the bottom, while smaller pollock, which have less economic value, are found just above the bottom in the water column.⁸ Additionally, as fishing operations occur, “fish in the pelagic zone may swim towards the bottom in response to vessel noise, towing wire, and doors.”⁹ Pelagic trawl nets used in state waters (i.e. the Prince William Sound pollock trawl fishery) are large nets, with one trawl fisher, who has trawled in Alaska for over thirty years, describing their net as, “the net I use for Prince William Sound...it's a big net ... the bottom of the net is about 800 to 900 feet somewhere in that range.”¹⁰ In March 2026, the Alaska Department of Fish and Game (“ADF&G”) Commissioner stated to the Board, “we have some bottom contact with the pelagic gear.”¹¹ The trawl gear defined and regulated as “pelagic” are in fact, mostly on the bottom of the ocean floor.¹² The current lack of enforcement of the Alaska regulatory definition of “pelagic trawl” ignores the practices of the trawl fleet, and undermines the efforts to minimize trawl gear impacts on nearshore benthic habitat. Until there is such a time that the pelagic trawl fleet can definitively prove the trawl gear does not contact the ocean floor while deployed, it should be managed as operating on the bottom.

II. March statewide meeting commitments to action

² Moniz, Rhonda, *Chile bans bottom trawling in vulnerable areas*, Marine Technology News, January 29, 2013, <https://www.marinetechologynews.com/blogs/chile-bans-bottom-trawling-in-vulnerable-areas-700331>

³ *Greece bans bottom trawling in all Marine Protected Areas*, Oceanographic, April 25, 2024, <https://oceanographicmagazine.com/news/greece-bans-bottom-trawling-in-all-marine-protected-areas/>

⁴ *Total ban on sandeel fishing and partial ban on bottom trawling announced in the UK*, Oceanographic, January 31, 2024, <https://oceanographicmagazine.com/news/ban-on-sandeel-fishing-announced-in-uk/>

⁵ Struna, Hugo, *Sweden bans bottom fishing in territorial waters*, Euractiv, June 4, 2024, <https://www.euractiv.com/section/agriculture-food/news/sweden-to-ban-bottom-trawling-in-territorial-waters/>

⁶ *Id.*

⁷ Brad Harris, Presentation to NPFMC Re: GII, June 2025 (7:40:00), <https://www.youtube.com/live/UaiKHbmOPPY>; See also, Kotwicki, S., Horne, J. K., Punt, A. E., and Ianelli, J. N. Factors affecting the availability of walleye pollock to acoustic and bottom trawl survey gear. – ICES Journal of Marine Science, 72: 1425 – 1439

⁸ S. Kotwicki, A. De Robertis, J.N. Ianelli, A.E. Punt, and J.K. Horne, Combining bottom trawl and acoustic data to model acoustic dead zone correction and bottom trawl efficiency parameters for semipelagic species, Can. J. Fish. Aquat. Sci., 18 December 2012, <https://doi.org/10.1139/cjfas-2012-0321>

⁹ Kotwicki, 2015, at 1.

¹⁰ December 2024 Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp), Alaska Board of Fisheries Meeting, Audio Recording, at 01:03:41:06, <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2024-2025/pws-24/index.html?mediaBasePath=/Meeting%2012-12-24%20BOW%20PWS%20%28Dec-12-24%204-23-07%20PM%29#>

¹¹ March 2026 Statewide finfish and supplemental issues, Alaska Board of Fisheries Meeting, Audio Recording, at 07:05:00, <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2025-2026/statewide-2026/index.html?mediaBasePath=/Meeting%2003-20-26%20%28Mar-20-26%205-42-30%20PM%29#>

¹² Bristol Bay Red King Crab Information, Discussion Paper, NPFMC, April 2022, page 26, <https://meetings.npfmc.org/CommentReview/DownloadFile?p=7608c5c6-d20a-4b3e-a23a7fb0754d3f71.pdf&fileName=D1%20BBRKC%20Information%20Paper.pdf>

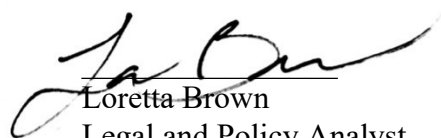
In March, the Board considered proposals¹³ to provide an enforceable standard, establish a clear and consistent compliance and accountability mechanisms for fishers and enforcement, and required salmon excluders to reduce salmon bycatch in the operation of pelagic trawl gear in state waters. The proposal authors and other interested Alaskans provided the Board with hours of testimony and multiple Record Copy documents¹⁴ to support the proposals or amendments to provide ADF&G, trawl fishers, and the public with clear and transparent regulation and enforcement of pelagic trawl gear operations. The Board, to gather more information and garner a better understanding of the operation and federal regulation of pelagic trawl fisheries, called for a joint protocol committee meeting with the NPFMC. In March, the Board made it clear that subsequent to that information-gathering meeting, the Board would undertake development of a board generated proposal.¹⁵ The Board is now readily equipped to develop a board generated proposal, with most or all a proposal's language available from amendment and findings language provided in the March 2026 statewide meeting.¹⁶

III. Conclusion

This Board cannot allow the current pelagic trawl efforts to continue without accountability and enforcement of the gear's interaction with the seafloor, to do so, would allow bottom trawling by a different name in areas closed to bottom trawling. SalmonState urges the Board to develop a board-generated proposal in this work session that updates the management of the trawl fisheries in a manner that provides clarity and transparency for the ADF&G and the public, as well as protecting important fish species and habitat from the destructive nature of trawl gear.

Please contact Loretta Brown at loretta@salmonstate.org with any questions regarding these comments.

Sincerely,



Loretta Brown
Legal and Policy Analyst
SalmonState

¹³ See, Proposals 163, 164, and 165, March 2026 Statewide finfish and supplemental issues, Alaska Board of Fisheries Meeting, <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=03-17-2026&meeting=anchorage>

¹⁴ See, Record Copies Numbered 134, 135, 136, 137, 138, 142, 143, 144, March 2026 Statewide finfish and supplemental issues, Alaska Board of Fisheries Meeting, <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=03-17-2026&meeting=anchorage>

¹⁵ Statewide finfish and supplemental issues, Alaska Board of Fisheries Meeting, Audio Recording, <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2025-2026/statewide-2026/index.html?mediaBasePath=/Meeting%2003-20-26%20%28Mar-20-26%205-42-30%20PM%29#>

¹⁶ See, Appendix A: Proposal Amendments and Findings

Appendix A:
Proposal Amendments and Findings

Submitted by Board Member Henaayee Irwin, prepared by the Alaska Department of Fish and Gameⁱ.

March 19, 2026

Substitute language for proposal 164:

5 AAC is amended to read:

5 AAC 39.105. Types of legal gear.

(d) Unless otherwise provided in this title, the following are legal types of gear:

...

(10) a trawl is a bag-shaped net towed through the water to capture fish or shellfish;

(A) a beam trawl is a trawl with a fixed net opening utilizing a wood or metal beam;

(B) an otter trawl is a trawl with a net opening controlled by devices commonly called otter doors;

(C) a pelagic trawl is a trawl where the net, or the trawl doors or other trawl-spreading device, **are not intended to** [DO NOT] operate in contact with the seabed, and which does not have attached to it any protective device, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed; **and includes at least one bottom contact sensor capable of detecting and recording contact events with the seabed located in the center of the footrope;**

5 AAC is amended by adding a new section to read:

5 AAC 39.1XX. Operation of pelagic trawl gear. While pelagic trawl gear is deployed, a person who holds a valid CFEC permit for that gear is responsible for electronically recording with a bottom contact sensor data that must be retained for six months and provide the unedited data from the bottom contact sensor or sensors to the department annually or as requested by the department.

ⁱ Preparation of draft substitute language at the request of a Board member does not imply ADF&G support. The Department will state its position on the language during deliberation.

Submitted by Board Member Henaayee Irwin, prepared by the Alaska Department of Fish and Gameⁱ.

March 19, 2026

Substitute language for proposal 165:

5 AAC 39.105(d)(10) is amended to read:

5 AAC 39.105. Types of legal gear.

(d) Unless otherwise provided in this title, the following are legal types of gear:

...

(10) a trawl is a bag-shaped net towed through the water to capture fish or shellfish;

(A) a beam trawl is a trawl with a fixed net opening utilizing a wood or metal beam;

(B) an otter trawl is a trawl with a net opening controlled by devices commonly called otter doors;

(C) a pelagic trawl is a trawl where the net, or the trawl doors or other trawl-spreading device, do not operate in contact with the seabed, and which does not have attached to it any protective device, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed; **and must have a salmon excluder as part of the trawl net when deployed;**

(D) for the purposes of this subsection a “salmon excluder” is an escape mechanism in a trawl net that is designed to allow salmon to escape from the net that may use a single panel or double panel design combined with an outer escape hole;

ⁱ Preparation of draft substitute language at the request of a Board member does not imply ADF&G support. The Department will state its position on the language during deliberation.

ALASKA BOARD OF FISHERIES
Board Finding Affirming
Pelagic Trawl Gear Definition and Supporting Seafloor Contact Sensors,
and Habitat Accountability in State Waters

[DATE]

[2026-XXX-FB]

WHEREAS, the Board has long recognized that Alaska's fisheries resources are foundational to the economic, cultural, and food security of Alaska's coastal communities, and that the conservation of fish habitat is inseparable from the sustainable management of those resources; and

WHEREAS, the Board's regulations define pelagic trawl gear as trawl gear that is fished in the water column and does not contact the seabed, which is a definition reflecting the fundamental operational and ecological distinction between pelagic and bottom-contact trawl gear; and

WHEREAS, the Board has previously established areas in State waters closed to bottom trawling for the purpose of protecting fish habitat, sensitive benthic communities, and spawning, rearing, and feeding areas essential to the productivity of Alaska's fisheries; and

WHEREAS, the purpose and integrity of those habitat closures depend on reliable assurance that gear operating in those areas, as pelagic trawl, is in fact not contacting the seabed; and

WHEREAS, available technologies, including seabed contact sensors and gear-monitoring devices, are commercially available and provide a practical and cost-effective means of verifying that trawl gear is operating as represented, consistent with a principle of trust-but-verify; and

WHEREAS, the Board has an obligation under the sustained-yield principle to ensure that gear classifications reflect actual fishing practices and that tools to verify intended use and operation of lawful gear keep pace with available technology and conservation needs; and

WHEREAS, the implementation of seabed contact sensors on trawl vessels operating in State waters will increase the clarity, enforceability, and sustainability of existing regulations, and should not result in a prohibition on legal fishing.

The Board makes the following findings:

1. The Board's existing regulatory definition of pelagic trawl gear as gear that does not contact the seabed is a substantive conservation standard, not merely a gear classification. Affirming and clarifying that definition advances the Board's conservation mandate and promotes consistency in how gear is characterized, operated, permitted, and managed in State waters.
2. The Board finds that seabed contact sensors or equivalent gear-verification technology as a required gear component is consistent with a principle of trust-but-verify. The Board does not presume that permit holders are misrepresenting their gear's operation, but

recognizes that the absence of an objective verification mechanism creates a data/information gap that undermines the enforcement of habitat closures and lawful gear-type regulations. Sensor technology provides an objective, documentable record of gear behavior that protects responsible operators and enables meaningful oversight.

3. The Board recognizes that state waters include critical habitat for all life stages of our diverse Alaskan marine species, critical to our state's culture, economy, and ways of life.

4. The Board finds that meaningful habitat protection necessitates implementable, effective, and cost-effective gear-verification technology.

5. The Board finds that seabed contact verification and enforcement will advance the goal of eliminating bottom contact and incidental impacts of pelagic trawl gear to non-target species and sensitive habitat. Ensuring that pelagic trawl gear is operated in compliance with the existing definition will advance conservation objectives while preserving fishing opportunities.

6. The Board finds that increased clarity in operational verification capacity promotes transparency and public confidence; improves the sustainability profile of Alaska's trawl fisheries, and provides a foundation for coordinated accountability measures between the Board, the Alaska Department of Fish and Game, the North Pacific Fishery Management Council, and relevant federal agencies consistent with the Joint Protocol Agreement between the Board and the NPFMC.

7. The Board finds that verification of gear operating standards aligns with federal priorities for fisheries data collection, bycatch reduction, and habitat impact minimization, and that Alaska has a demonstrated interest in pursuing a federal partnership that includes cost-sharing for enforcement programs. The Board notes that prior mandates imposed on Alaska fishermen have historically been funded through federal appropriations in other states but not in Alaska — an inequity previously recognized by the Board in Resolution 2008-256-FB. The Board therefore encourages the ADF&G, the Alaska Congressional Delegation, and the Governor's office to actively pursue federal funding mechanisms — including through NOAA Fisheries, legislation, and relevant appropriations processes — to offset the cost to fishing operations and management bodies, and to treat seafloor contact sensor programs as eligible components of federally supported fisheries management infrastructure.

NOW THEREFORE BE IT RESOLVED, the Alaska Board of Fisheries adopts this finding affirming that the State of Alaska definition of pelagic trawl gear is intended to prevent seafloor contact by that gear, and thus enforcement of the operational intent of the definition will require implementation of seafloor contact sensor technology in State Groundfish fisheries and State Parallel Waters fisheries. It is also resolved that the Alaska Board of Fisheries will provide input to the NPFMC to express the Board's interest in the pelagic trawl gear performance standards and encourages the timely development and implementation of those standards in Federal waters. The Board will consider the performance standards established by the Council. The Board is aware that any standards developed by the Council apply to the State parallel fishery, and the Board will consider, but not be limited to, adopting those standards, provided they adhere to the

intent of the existing State of Alaska pelagic trawl gear definition and its prohibition of seabed contact.

ADOPTED this ____ day of _____, 20__.

[Chair Name], Chair
Alaska Board of Fisheries
Vote: ____

Dear Members of the Board,

Members of the Alaska Healthy Habitat Alliance would like to register our support for RC 156, the Findings Letter submitted by Board Member Wood on proposal 163-164. **In particular, we strongly support the language in Mr. Wood's letter that:**

- Confirms that the existing regulatory definition of pelagic trawl gear as gear that *does not contact the seabed* is a substantive conservation standard;
- Commits to gear-verification technology as a gear component on vessels operating pelagic trawls in State waters;
- Grounds the finding in the Board's authority to ensure gear classifications reflect actual fishing practices;
- Recognizes that the integrity of existing bottom-trawl closure areas depends on enforceable verification that gear operating in those areas as "pelagic" is in fact not contacting the seabed;
- Acknowledges that state waters contain critical habitat for all life stages of Alaska's marine species, that habitat protection is inseparable from sustainable fisheries management, and that the Fishing Effects model guiding the NPFMC does not assess state water's habitat;
- Positions the Board to provide input to the NPFMC on pelagic gear performance standards, with the Board reserving the right to consider, but not be limited to, federal standards — provided they adhere to the intent of Alaska's existing prohibition on seabed contact.

Thank you again to Board Member Wood for submitting this RC.

Greetings Members of the Alaska Board of Fish,

Please accept these comments as **support** for ACR 5 Reclassify European green crab from a class A to a class B banned invasive species (5 AAC 41.075).

My English name is Keenan Sanderson, my Xaad Kil name is Gándl Íngguud Kungáay Xahl, which means the Bright Moon over the Water. I am a lifelong Haida resident of Ketchikan, Alaska with ties all over Prince of Wales Island. I am also a lifelong subsistence harvester and former commercial troller, longliner, and seiner in Southeast Alaska. I attended the College of Fisheries & Ocean Sciences at the University of Alaska Fairbanks where I graduated with a Bachelors of Fisheries & Ocean Sciences in 2019. I previously have held positions with various Federally recognized Tribes in Southeast Alaska by working on regulation, policy, and legislation at both the state and federal level as it relates to fish & wildlife management. While my comments don't necessarily reflect the opinions of this entity, I have been an active member of the Ketchikan Fish & Game Advisory Committee since 2021. Finally, my last relevant hat that I wear is that I am the head coach of the Ketchikan National Ocean Sciences Bowl team (the Saber-Toothed Salmon/Smolts/Fry) where I currently coach & teach 23 high school students about anything and everything about the ocean in Alaska and beyond, more on that later.

I am writing to the Board of Fish to express my **support** for the passage of ACR 5 at the upcoming October work session for further discussion at one of the upcoming Board of Fish meetings in 2027.

Background of European Green Crab

Invasive European Green Crab (*Carcinus maenus*) are likely going to be among the biggest threats to Southeast Alaskan Shellfish Fisheries and to a lesser but noticeable extent to smaller salmon fisheries all along the coast. European Green Crab first came over to the United States 200+ years ago along the east coast. These crab have had devastating impacts to various shellfish fisheries in that region, most notably the softshell clam (*Mya arenaria*) industry. The consensus opinion of relevant researchers attribute a 75% reduction of that fishery to invasive European Green Crab. Fast forward to the 1980's, European Green Crab made their way to the west coast of the United States in San Francisco Bay. While European Green Crab do have a lower limit to their environmental thermal tolerance, the amplification of increased sea surface temperatures through climate change has allowed their range to expand northward along the west coast of the United States. Since their introduction in California, these crab have been slowly making their way north through Oregon, Washington, British Columbia, and in 2022 representatives of the Metlakatla Indian Community found the first live European Green Crab in Alaska on July 19th of that year. Since then the Ketchikan National Ocean Sciences Bowl team found the first live crab on the Ketchikan road system in the summer of 2025. European Green Crab have also been

found in western Prince of Wales just south and west of Hydaburg, eastern Prince of Wales near the Organized Village of Kasaan, and as far north as Etolin Island near Wrangell. Make no mistake, invasive European Green Crab now that they have made it to Alaska will continue to rapidly expand further north as time goes on.

European Green Crab Observations Reported to ADF&G, 2022-2026

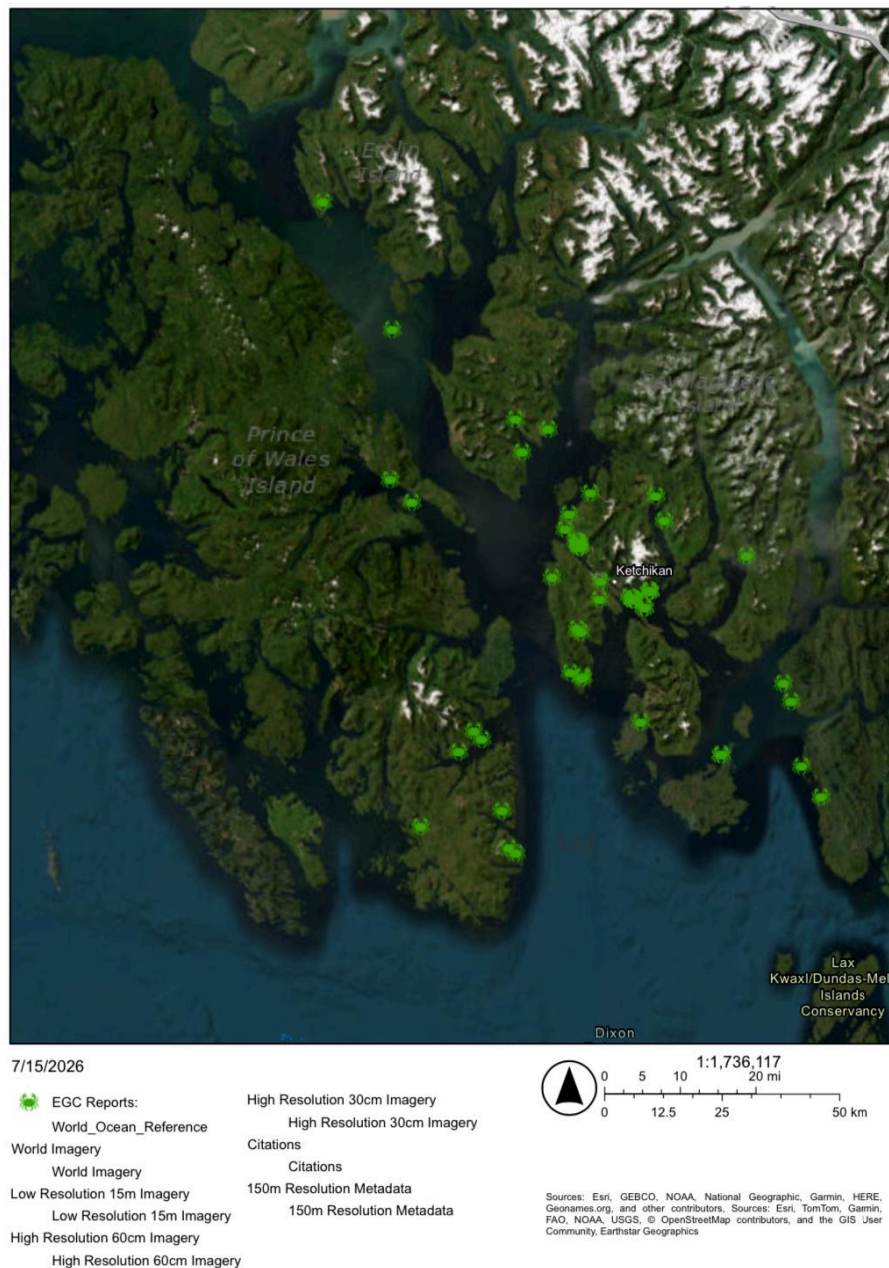


Figure 1. Map of confirmed observations of live crab or carapace detection in southern Southeast Alaska. This map was as of July 15th, 2026. Since then there have been other observations made in Tlevak Strait near western Prince of Wales Island.

The International Union for the Conservation of Nature recognizes European Green Crab as one of the Top 100 Worst Invasive Species in the world. European Green Crab have invaded every continent on the planet except Antarctica. Why is this? Just about everything about the European Green Crab biology and ecological niche makes them one of the most effective invaders ever. These crabs tolerate a wide range of ocean parameters including but limited to sea surface temperature, salinity, pH, and benthic environments. These crab particularly like brackish water and for short periods of time even freshwater environments where many of our subsistence and commercial resources already exist. European Green Crab also fill an ecological niche that will make it difficult for our native species to combat this invasive species on their own. Presently, it is unclear which, if any, of our native marine predators may have an impact on these invasive species propagation. It is in my estimation that there **will not** be any significant predation by other crab species, birds, bears, or fishes on European Green Crab. In invasion ecology, there is this concept of the “enemy release hypothesis” that states that if an invasive species is not subjected to relatively high rates of predation or parasitism, invasive species can flourish early on after introduction. There is research ongoing out of the University of Washington & Washington Sea Grant that European Green Crab are not being subjected to any parasites that they would in their normal range. I believe that Southeast Alaska will be one of those cases where European Green Crab will be released from their enemies and will go essentially unchecked if there is no human intervention.

There is research going on south of Alaska that sea otters (*Enhydra lutris*) may show some predatory habits on European Green Crab, however I am not convinced that biological control will not be effective:

1. Sea otters are not in high density throughout Southeast Alaska. My home community of Ketchikan alone rarely sees otter activity.
2. Even with European Green Crab & sea otter overlapping territory, I have real doubts that otters will target these invasive species. Southeast Alaska is home to several large shellfish species that are much larger than are already in the otters diet. Until populations of clams, urchins, abalone, red rock crab (*Cancer productus*), and dungeness crab are depressed to the point where sea otters cannot find them, I don't believe that European Green Crab will be a primary predatory target for otters.
3. However, let's say for the sake of argument that otters will target European Green Crab. Because of the Marine Mammal Protection Act and its restrictive nature that takes away the ability of the management & culling of sea otters in various areas, adding in another food source for otters is only going to make otter predation worse, not better. Adding in another food source is only going to promote the growth and reproduction of sea otters in

Southeast Alaska. Our villages and commercial shellfish fisheries are already experiencing unprecedented lows in populations. The state already has shut down the Dungeness crab fishery several weeks before the scheduled closure. Maybe I am wrong about how sea otters and European Green Crab will interact with one another, but until Federally Recognized Tribes are able to be effective managers of sea otters, otters only amplify the issues we are seeing in our region. For the record, this **does not** mean that I want the management of marine mammals to be handled by the state of Alaska.

Finally, European Green Crab are effective invaders due to their life history. Gravid (egg bearing) females can hold upwards of 200,000 eggs per reproductive cycle, which can happen up to two times per year. European Green Crab also are sexually mature at a relatively young age. Once eggs develop, larvae can drift along with ocean currents for up to 100's of miles. This is currently the leading theory for how European Green Crab got to Alaska. This also is an important side note for how European Green Crab abundance is changing early on its invasion of Southeast Alaska. At first, invasive crab will colonize new areas through this zooplankton dynamic. This process is slow because survival rates of those 200,000 eggs/crab is low, especially when crab settles far away from where they were released. However, once localized areas with European Green Crab that have enough sexually mature individuals that would negate the lower bounds of potential allee effects, populations can start adding new crab through local recruitment. Local recruitment will result in significantly increased rates of population growth than distribution through larval movement. This is exactly what we are seeing in both Metlakatla & Ketchikan since European Green Crab have been identified in both of those locations. You will see that data later in this comment.



Figure 2. Gravid female European Green Crab found at Sunset Beach in June of 2026.

So what is the problem with invasive European Green Crab?

Now that we have established that European Green Crab are successful invaders, that in itself doesn't convey the potential damage that will be had on the Southeast Alaskan marine ecosystem. As of this moment, it is too early to tell what the exact impact there will be, but we can look down to our neighbors in British Columbia and further down the coast in Washington, Oregon, and California to see what kinds of scenarios may apply here.

European Green Crab have this ability to reproduce and grow their populations to high numbers compared to other species in their native range. These crab (max 10cm across the carapace) don't grow to be large like that of our beloved Dungeness Crab here in southeast Alaska, but they do make up for that in sheer numbers. Population estimates are difficult to obtain for a species like this, but we can get an idea of what is out there based on harvest data. The Council of the Haida Nations in British Columbia, Canada (on the opposite of Dixon Entrance from southern Prince of Wales, Metlakatla, Ketchikan, and Saxman) first identified European Green Crab in their territory in the summer of 2020. Since then, their natural resources crew have harvested over 2,000,000 individual crab through intensive trapping efforts. The Metlakatla Indian Community found their first crab in the summer of 2022, since then they have harvested over 77,000 individuals as of August 31st, 2026 according to publicly available data. The Ketchikan National Ocean Sciences Bowl team found the first live European Green Crab at Mud Bay along the road system here in Ketchikan in August 2025. This year alone, with minimal trapping effort by the Ocean Sciences team, the Ketchikan Indian Community, and Sealaska have removed roughly 7,000 crab along the Ketchikan Road system. (I would also encourage you to look at the work being done in Willapa, Washington.) All of these places now have established populations that will see populations increase significantly as a result of local recruitment as opposed to larval disbursement. More on this data later.

One of the bigger concerns from European Green Crab is their ability to outcompete native species within commonly shared spaces in the marine environment. While there is not a complete ecological overlap between our subsistence & commercially viable species such as Dungeness crab (among other species). This has already been seen in Alaska by myself & my team, the Ketchikan Indian Community, Sealaska, and the Metlakatla Indian Community. This will result in a competition for food and spatial resources. It seems to be clear that adult Dungeness Crab can hold their own against adult European Green Crab. However there is evidence that adult European Green Crab outcompete juvenile native species for food at a significant level. The Ketchikan Indian Community through their trapping efforts in 2026 have even seen evidence on adult European Green Crab predating on live juvenile native crab species. By the state's own admission, the Southeast Alaskan shellfish subsistence and commercial fisheries are not sufficient for normal fisheries operations. This added pressure through direct competition and even predation is going to further depress these fisheries that us resident Alaskans depend on.

European Green Crab by the vast majority of professional ecologists are classified as an "ecosystem engineer." It has been well documented throughout their invasive range that they disrupt vital eel/sea grass habitat. Areas in British Columbia, Washington state, Oregon, and New England are all saying the same thing: these crab are capable of destroying this habitat. Why are these types of environments important, you ask? These grass beds serve as critical nursery habitat for a variety of species during their juvenile life stages. Many of the organisms that

benefit from these types of habitats are invertebrates, but even juvenile salmon use eel grass beds as sheltered habitat as they transition from the freshwater to the marine environments. The Alaska Department of Fish & Game needs to make a good-faith effort to document and track how eel grass beds change as this invasion occurs. It is my understanding that the last time the state evaluated the health of eel grass beds was over 3 decades ago. That needs to be updated ASAP. That being said, the loss of eel grass beds is going to result in increased mortality of several species that rely on those environments.

Rationale of ACR 5

This ACR is asking to do one simple thing: allow the citizens of Southeast Alaska in some capacity to help mitigate the impacts of this European Green Crab invasion through personal removal efforts. As of right now (to my knowledge), the only entities that are actively making any significant effort to deal with issue on the grounds are the: Ketchikan National Ocean Sciences Bowl team, the Ketchikan Indian Community, the Metlakatla Indian Community, Sealaska, a local ecotourism business in Ketchikan, and more recently the Organized Village of Kasaan & the Central Council Tlingit & Haida Indian Tribes of Alaska. I would like to point out 2 things about that list:

1. That list does **not** include the state of Alaska & the Alaska Department of Fish & Game. Maybe the Board of Fish isn't aware, but the entire state has only one (1) person dedicated to deal with the threat of invasive species. Not one person for specifically marine invasive species, not one person specifically for the entirety of Southeast Alaska, just **ONE** person to tackle every invasive species issue across Alaska's 660,000+ square miles. I understand that the Board of Fish and Department of Fish & Game does not have authority set its own cashflow through the state, but both entities need to do a better job advocating to the Governor & legislature to ensure the department can effectively manage for sustainability for all resources and organisms in our region, not just the ones that make the most money. The state cannot call themselves the best management entity for fisheries around the world and sit idly by as ecological disaster is barreling towards them. That being said, I want it on the record that ADFG's lone invasive species expert is doing their best to support those who are on the ground. We need 15 more of them.
2. You'll also notice that the vast majority of effort that is going into European Green Crab removal is coming from either a Federally Recognized Tribe or Alaska Native Corporation. Several Federally Recognized Tribes in Southeast Alaska have already declared a state of emergency because they understand the damage will be coming upon our communities. The Tribal entities are putting a lot of effort into this because they see the urgent need for it, all in spite of having inadequate funding. Sacrifices are even being made in programming in some cases to make this happen. Instead of taking advantage of

the Tribes connection to the ocean, the State of Alaska should be making a good faith effort to supply resources and personnel to deal with this problem.

However, at the moment, the Tribes alone are not going to be able to solve this problem alone. They need support and right now it isn't coming from the state. That being said, we have many citizens of Alaska that want to contribute effort. ACR 5 seeks to allow the everyday citizen to capture and remove invasive European Green Crab. This will dramatically increase the number of eyes and boots on the ground to help us track and remove these crab. The staff of all these entities simply cannot cover the majority of the Southeast Alaska coastline with their limited capacity. However, if we can empower the many Alaskans that frequently visit beaches, especially those that go to beaches off the road system, can help expand our search area.

Responding to Commissioners Rejection Letter

Back in the Spring of 2026, the Commissioner of the Alaska Department of Fish & Game rejected the Ketchikan Indian Community's effort to do something similar to ACR 5. The contents of that rejection letter I believe is misrepresenting the threats and opportunities of this issue. I would like to respond to a handful things that were said by the Commissioner:

1. "The department does not believe there is food value in European green crab due to their diminutive size..." There are active commercial fisheries for European Green Crab in, well, Europe. "Soft-shelled" crab is a growing industry in several places including Europe and the east coast of the United States (blue crab (*Callinectes sapidus*)). Sure, I will admit that you cannot eat a European Green Crab in the same way you eat Dungeness or king crab. But there is extensive, and surprisingly easy to find through a quick google search, on the development of the usage of European Green Crab as a consumable seafood product. The Woods Hole Oceanographic Institute, New Hampshire SeaGrant, and <https://www.greencrab.org/> have done extensive work in developing consumable foods. Even large news outlets such as the New York Times have put our articles on the work that these institutions are putting out. There are literally multiple cook books that have been written & published based around European Green Crab. However, don't take my word for it, take the word of local businesses in Ketchikan that see an opportunity in this emergency. The owners of Fishes & Dishes, a local food truck that operates during the tourism season, are looking into ways they could incorporate invasive European Green Crab if/when the state would allow commercial consumption. I'm not going to sit here and lie to you and say that the entire population of

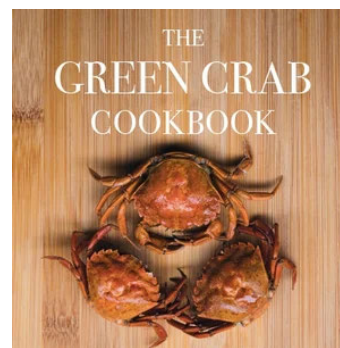


Figure 3. A European Green Crab cookbook that was published in 2019.

Southeast Alaska is going to start racing towards the beaches to capture and cook European Green Crab if regulations were to be loosened, but it is clear that seafood business owners see an opportunity with 15,000+ cruise ship passengers coming to Ketchikan on a daily basis for nearly 6 months of the year.

People are also getting creative using European Green Crab outside of direct food products. I think my favorite & unique way that I've seen European Green Crab being used as a component in a signature whiskey at the Tamworth Distillery in New Hampshire. I personally have been to this distillery and sampled their "[Crab Trapper Whiskey](#)." I'm not a whiskey man myself, but I will tell you it actually was a really well crafted alcohol. We have also seen European Green Crab being used in fertilizer, compost, pet food, livestock food, and fishing bait (I would be hesitant to allow using these crab as bait for anything). That being said, I believe it is disingenuous to say that there is no value in European Green Crab.

2. The Commissioner's letter goes on to say "The Oregon Department of Fish and Wildlife reports native crabs are commonly mistaken for European green crabs." To the Commissioners credit, this statement isn't factually wrong. Misidentification of European Green Crab is an issue that all of us educators are actively working on. I can't tell you how many times I've said "you have to count to 13 spines." However, whenever anyone obtains a Fish & Game permit (of any kind), you as the harvester are ultimately responsible for being able to correctly identify anything you harvest. Sport harvesters can't just go out and target cohos (*Oncorhynchus kisutch*) and come back to the dock with 6 king salmon (*Oncorhynchus tshawytscha*). Commercial harvesters can't go out and target golden king crab (*Lithodes aequispinus*) and come back to the dock with a hold full of red king crab (*Paralithodes camtschaticus*). There is a clear expectation that the harvester should be able to correctly identify anything they harvest. This in turn comes down to an enforcement issue. In many situations, I don't believe "enforcement issues" should prevent regulation from being enacted, this is definitely one of those situations. If the Department would be more comfortable adding gear & bag limit stipulations, I'm open to having that conversation, but we can't have that unless ACR 5 passes at the October work session. Honestly I'm 100% ok with not allowing targeted trapping for those who do not possess Aquatic Resource Permits (ARPs), the vast majority of the crab removal for the Ketchikan National Ocean Sciences Bowl team has been through handpicking. Handpicking has been very effective on several beaches along the Ketchikan road system.
3. The letter next goes on to say "At this time, evidence is lacking to support the petitioner's concerns that European green crab have contributed to changes in eelgrass habitat, loss of native coastal fish or shellfish species, or caused changes in fishery populations to

demonstrate an unforeseen, unexpected event threatening a fish or game resource...” To be honest I’m not sure where to start with all of this. To me, this tells me that the State of Alaska will only pay attention to the issue until the damage is already done in Alaska. This is an openly egregious example of **reactive** management as opposed to **proactive** management. Is that really the exemplary management competency that the Department claims it has over our natural resources? I don’t think so.

However, we don’t need to see damage occur specifically in Alaska to see what is going to happen along our coastlines. Countless monitoring and research efforts from some of the most prominent university, state, federal, and tribal institutions on the planet have documented the damage European Green Crab have done in other regions. I really cannot see where the Department is getting this “lack of evidence.” Either the Department doesn’t acknowledge the work that has been done up to this point on invasive European Green Crab, or they didn’t do their homework. That being said, here are a few of the many journal articles that provide the evidence the Department seemed to have missed:

- a. Ens, N. J., Harvey, B., Davies, M. M., Thomson, H. M., Meyers, K. J., Yakimishyn, J., ... & Gerwing, T. G. (2022). The Green Wave: reviewing the environmental impacts of the invasive European green crab (*Carcinus maenas*) and potential management approaches. *Environmental Reviews*, 30(2), 306-322.
- b. Matheson, K., McKenzie, C. H., Gregory, R. S., Robichaud, D. A., Bradbury, I. R., Snelgrove, P. V. R., & Rose, G. A. (2016). Linking eelgrass decline and impacts on associated fish communities to European green crab *Carcinus maenas* invasion. *Marine Ecology Progress Series*, 548, 31-45.
- c. Howard, B. R., Francis, F. T., Côté, I. M., & Therriault, T. W. (2019). Habitat alteration by invasive European green crab (*Carcinus maenas*) causes eelgrass loss in British Columbia, Canada: BR Howard et al. *Biological Invasions*, 21(12), 3607-3618.
- d. This one is probably my favorite source that claims European Green Crab will have an impact on native eel grass beds, crab species, clams, salmon, and more... The Alaska Department of Fish & Game website:
https://www.adfg.alaska.gov/index.cfm?adfg=invasiveprofiles.europeangreencrab_impacts

That being said, there is clear evidence that there is a great potential for European Green Crab to have a significant impact on the environment and the organisms that inhabit it. If needed, I can submit more literature. (I also want it put on the record that in this letter sent by the Commissioner that there was no literature cited that supported their claims

that European Green Crab doesn't have impact).

4. The Department doesn't believe that this is an emergency, as stated in their letter from the Commissioner. My hope is that at this upcoming October work session that the commissioner can articulate his rationale because I can't see a world where this is not an emergency. Especially when the state by its own admission has said that many of its shellfish fisheries are at critically low levels. I'm not sure if any Dungeness fishers or commercial fishers are able to convey their struggles on their respective fisheries at this work session, but I think they would have a different perspective on whether or not our fisheries are in crisis. I will note, the Ketchikan Borough Assembly adopted "[Resolution 3212 Urging Governor Dunleavy and the State of Alaska to Pursue a Federal Fishery Resource Disaster Declaration for the 2026-2027 Southeast Alaska Commercial Dungeness Crab Fishery](#)" at their October 5th, 2026 meeting. The representatives of our entire community are calling this a disaster, seems like an emergency to me given that the introduction of European Green Crab is going to make this situation worse.

5. The final comment from the Commissioners letter I would like to point out is "An alternative to amending 5 AAC 41.075 is to apply for an Aquatic Resource Permit from the department to engage in science-based trapping and collection of European green crabs." Yes, I agree. This is a valid option, but it is the only option. The problem with this though is that ARPs are not conducive for the general public. If you haven't seen the ARP application or seen the requirements, I would encourage you to check this [link](#) that shows what it is. It is very cumbersome. It is a huge barrier for any Alaska resident that wants to contribute that isn't set up to deal with the reporting requirements. The application itself and the referenced comment by the Commissioner already pre-emptively prevents non-institutional individuals from participating in removal efforts on their own. I am thankful that our Ocean Science Bowl team is recognized as a "science-based" institution, but not everyone is affiliated with something like that. Should European Green Crab be reported to the state if found? Yes, but in my experience there are many who fear persecution by the state for not having done "everything correctly." That being said, I think we can work with having data requirements of: where it was found and how many were harvested if an ARP is not in use at that time. This is why this proposal and ACR 5 need to be discussed further.

I think it is also important to share with you what we are seeing on the ground in Ketchikan so here are a few points of information and data for the Boards consideration.

1. As of the writing of this comment letter, the Ketchikan National Ocean Sciences Bowl team has removed over 1,800 European Green Crab along the Ketchikan road system (up

from 5 of all last year). The vast majority of these crab have come from Mud Bay, but we've had a solid amount of crab removed from Herring Cove, Mountain Point, Rotary Beach, and Refuge Cove. These data are only from the National Ocean Sciences Bowl team's ARP. However, between us, the Ketchikan Indian Community, and Sealaska roughly 7,000 crab have been removed in 2026 in Ketchikan. The raw data will be available for the state and anyone else to see when the calendar year ends and our report is made to the State of Alaska.

2. We found out early on this summer for most beaches that one of the most effective methods of capture is handpicking. Of the 1,800 crab we have captured this season, roughly 95% of them were handpicked. There were days where we had handpicked over 175 crab within a 1-2 time frame. For the purposes of what our team was able to do, and partially due to convenience, there wasn't a huge need to set traps, especially in Mud Bay. Handpicking allowed our team flexibility for when we went out on the beach. Trapping, at minimum, requires one cycling of the tides, but generally are set for a 24 hour time period, meaning it was necessary to do this in consecutive days. That wasn't always possible for us. This emphasizes my support for citizens being able to retain European Green Crab without the use of traps.
3. From the raw data, we are seeing a skewed capture rate towards male crabs, roughly 55% male and 45% female. For us it is unclear whether or not this is attributed towards sampling bias, sex dependant behavior, or if that is truly representative of the population but this is something I believe needs to be studied more intensively because we need to develop better methods that increase female capture since they are the ones that ultimately drive population growth.
4. The Ketchikan Indian Community can report back on their findings if they wish to do so, but in my time volunteering in their efforts, the trapping removal is beyond staggering. There are days where we were capturing 100+ European Green Crab in a single pot. Towards later in the season, we were averaging 70+ crab per pot some days at Mud Bay. Through informal discussions with the Metlakatla Indian Community Green Crab crew, we've had several days where Ketchikan's catch per unit effort (trap/day) was significantly higher than anything that has been seen on the Annette Island Reserve, even though we have only, knowingly, had European Green Crab 3 years after they did. As a Ketchikan resident, that is very concerning.
5. This was previously mentioned but still important to note. We are seeing evidence that European Green Crab are predating on native juvenile crab species.

6. I think it is important to share with you what kinds of education and outreach efforts are happening in our communities. The Ketchikan Indian Community has been conducting public trapping events at Rotary Beach throughout the summer to help spread awareness about this issue. These events have been incredibly well attended. The August trapping event they had over 35 people attend. These citizens spent 2 hours learning how to identify European Green Crab and the various native species along our beaches. The Ketchikan Indian Community has also rolled out their “Coastal Guardians Observation & Green Crab Response Network” during the Blueberry Festival. The Tribe was able to sign up over 500 individuals to this network where they obtained contact information so they can announce events, share reporting numbers with the public, and create an avenue for all Ketchikan citizens to contact the Tribe to help report sightings of European Green Crab. To me, there is clearly a public interest to get involved in mitigating this problem. The Ketchikan National Ocean Sciences Bowl team and the Tribe are actively working with the Ketchikan School District to come into classes to teach students about identification and related issues with European Green Crab later this winter, with the possibility of doing some work during our beach days. The Metlakatla Indian Community are also doing community outreach events that have been shown to be very effective.



Figure 4. Participants of the Ketchikan Indian Community Green Crab event in August pose with the Crab themselves.

In conclusion, what this proposer is asking for is the Board of Fish to:

1. A recognition that European Green Crab have the potential to do severe ecological damage in Southeast Alaska.
2. A recognition that citizen engagement in this issue will likely be low unless Alaska Citizens are able to directly contribute through removal.
3. Allow us citizens, researchers, business owners, and other interested parties to give us a fair shake at the podium with the Board of Fish on this issue. We recognize that a yes vote at this work session does not change regulation immediately nor does it tie the hands of the Board of Fish to make that decision at any point.

We believe there is sufficient evidence that meets the criteria to move forward with this ACR so we may have a productive conversation about this issue at a meeting in 2027. We do not have the time to wait until 2028 to have this conversation. We are seeing significant population growth in the areas where European Green Crab already exist, and we are continuing to find European Green Crab in areas that previously hadn't been identified. This problem isn't going away and will only get worse the longer that we wait to do something about it. All we ask is to allow us to have a robust discussion about this issue in either Seward, Kodiak, or Anchorage during one of the upcoming meetings. Many of us who are paying attention to this issue are working hard to contribute and it is very disheartening when the top fisheries management professional in the State of Alaska blatantly disregards this invasion as a non-issue. Please understand that we want what is best for our ecosystem, our neighbors, our fishers, and our state. We look forward to discussing this issue further with the Board.

Furthermore, the State of Alaska needs to make meaningful investments to help protect our shellfish fisheries from invasive European Green Crab by supporting the Federally Recognized Tribes that are actively working on this issue or are putting themselves in a position to do so. This issue is impacting **everyone** that has a vested interest in Southeast Alaska fisheries, but only the Tribes are dedicating significant time, resources, and capital to do so. The Ketchikan Indian Community, Metlakatla Indian Community, the Organized Village of Kasaan, the Hydaburg Cooperative Association, and the Central Council Tlingit & Haida Indian Tribes of Alaska are all doing what they can with the resources they have to protect their communities. The State needs to do everything in their power to support them through grant acquisition (and letters of support) and advocating of state & federal dollars that need to be allocated to deal with this. Our Tribal Leadership and their support staff are more than knowledgeable to take on a significant portion of this effort, but not without the funding necessary to do these projects. The Tribes carry an immense amount of Traditional Ecological Knowledge (that the board now thankfully accepts as credible & critical data points) about our shellfish fisheries. Support the Tribes until the State can

put themselves in a position to contribute to larger efforts of removal.

P.S. I will be attaching the research paper that the Ketchikan National Ocean Sciences Bowl Team wrote for their 2025 state tournament project title “Invasive European Green Crab (*Carcinus maenas*) Mitigation in Southeast Alaska.” That team did an incredible job researching the topic and communicating with several research professionals to construct their paper. The judges from the College of Fisheries & Ocean Sciences at UAF recognized that paper as the highest scoring project that season in the entire state. These Alaskan youth are paying attention to what is going on around us. As their coach I couldn’t be more proud of the work they did. Some of you may recognize this research paper as it was submitted as an RC during the 2025 Southeast Alaska Board of Fish “Finfish & Shellfish” meeting in Ketchikan when we were discussing the Dungeness crab fishery. I would encourage anyone and everyone to give that paper a look. Their paper is the reason why I became informed and passionate on this issue.

Haw’aa (Thank you),

A handwritten signature in cursive script that reads "Keenan Sanderson". The ink is a light grey or blue color.

Keenan Sanderson
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Invasive European Green Crab (*Carcinus maenas*)

Mitigation in Southeast Alaska

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This paper was written as part of the Alaska Ocean Sciences Bowl high school competition. The conclusions in this report are solely those of the student author.

Abstract

One highly disruptive invasive species, European Green Crab (EGC), has recently been found in coastal ecosystems in Southeast Alaska. This invasive organism has a high possibility of causing extensive ecological damage, impacting both Alaskan cultures and the economy. EGC life stages and history play an important role in colonizing new habits. EGCs have a wide range of tolerance to temperature and salinity. However, their habitable range is shifting north due to climate change. Combining this with EGC eating habits, this leads to the invasions of new habitats worldwide. EGC's native range spans from Norway to northern Africa. Now, EGC has spread to every continent except Antarctica. The rapid spread of EGC stresses the importance of early detection and mitigation. Human introduction is a huge risk, as EGC can travel on or in various things, such as ballast water. EGC can be detected using eDNA samples and periodic trapping. Adjusting and removing significant exemptions from existing management programs in Alaska could aid in slowing the spread of EGC. Places with established populations are looking to start EGC fisheries. Long-term mitigation and potential eradication can be achieved through modification of gene drives and suppression of gene drives, which use CRISPR to change the most aggressive factors of EGC or cause sterility. With the presence of EGC in Southeast Alaskan coastal waters, both short-term and long-term mitigation strategies are vital to protect these ecosystems

Introduction

Ecosystems are negatively impacted by many species that enter environments they are not native to. These invasive or introduced species can outperform native organisms in acquiring resources and occupying space, resulting in ecological harm and reduced local biodiversity. Often spread through transportation and travel, the leading vector for these invasions is human interaction. Once introduced, these invasive species can disrupt entire ecosystems by acting as ecosystem engineers, altering local habitat structures in the affected areas. These impacts from invasive species not only harm the environment but also impact the cultural identity of Indigenous communities along the Pacific Northwest. In Southeast Alaska, one highly disruptive invasive species within coastal ecosystems is the European green crab (*Carcinus maenas*); which, for the purpose of this paper, will now be addressed as EGC. According to the International Union for the Conservation of Nature, EGC has been categorized as one of the 100 most invasive species worldwide (Lowe et al., 2000). These crustaceans have been spreading along coastal boundaries worldwide through various factors. This invasive species has recently been found inhabiting Alaska's coastal waters due to increased sea surface temperatures. Known for their ability to adapt, EGC are likely to cause significant ecological damage, negatively affecting Alaska's economy and Indigenous communities. Since EGC has already been found within coastal areas in Southeast Alaska, short-term mitigation strategies are a necessity to protect these ecosystems. However, long-term mitigation will be necessary if these strategies fail to address the problem.

Life History & Biology of EGC

To understand how EGCs will impact Alaska, their life history and biology need to be considered. The various life stages of EGC have been shown to play a significant role in how

EGC invades and this will likely be similar in Southeast Alaska. EGC transition between benthic adult and planktonic larval stages. EGCs have five life stages: egg, larval, megalopa, juvenile, and adult. After hatching the larval EGC develops in coastal water for about 50 days, during which they are carried by ocean currents drifting along the coast and settling in new areas (Klassen & Locke, 2007). Entering the megalopa stage, they develop legs and resemble small adult crabs with large abdomens. At this stage, EGC return to the shore, where they will grow into juveniles, and begin colonizing (Klassen & Locke, 2007). Sexually mature adults can live up to 4-7 years, and sexually mature females can produce up to 185,000 eggs during each reproductive cycle (Klassen & Locke, 2007). It is important to note that EGC is not a broadcast spawner like many other types of crab; instead, the female carries fertilized eggs with it (Crane et al., 2021). While life history is a vital part in EGC's invasion, their broad environmental tolerance also plays an important role.

EGCs have a wide range of tolerance to salinity and temperature (Klassen & Locke, 2007). EGCs are euryhaline and can tolerate salinity levels from 4 to 54 psu (Davidson, 2009). Temperature tolerance is one reason EGC have a wide latitudinal range. EGCs are eurythermal and can survive from 0 to 33°C (Davidson, 2009). However, as global ocean temperatures increase, EGC's habitable range will continue to increase poleward, posing not only a problem for Alaska, but for high-latitude coastlines around the world. Their diet is another reason EGC are such an effective invader. EGC are voracious omnivorous predators and aggressive competitors. Not many animals can outcompete invading EGC in their native environments, further reducing their barriers to invasion

Global Spread of EGC

EGCs have a wide native distribution, from Norway to northern Africa (Young, & Elliott 2019). EGC have been identified along both coasts of North and South America, as well as in South Africa, Japan, Asia, and Australia (Klassen & Locke, 2007). It is important to note that not every sighting of an EGC resulted in an established colony. However, they are very successful invaders. EGC are invaders with multiple paths to invasion. One way that EGC has come to non-native areas is through human intervention, for example, ballast water discharge and shellfish transfers like oyster shipments. Another path of invasion is non-human intervention; this is where it is spread naturally, for example, by ocean currents or walking along the bottom. Both ways have been observed in the worldwide invasion of EGC.

EGC was transported from Europe to Massachusetts in 1817, likely due to ballast water discharge or on the outside of a wooden ship. (Young & Elliott 2019). EGCs have since spread as far south as Chincoteague Bay, Virginia. Further expansion south is limited because of EGC's lower thermal tolerance threshold and the predatory Blue Crab (*Callinectes sapidus*). However, EGCs have spread northward, appearing as far as northern Maine (Young, & Elliott 2019). EGCs currently have a range of about 1,000–1,200 kilometers along the East Coast.

EGC was first documented on the western coast of the United States in San Francisco Bay in 1989. (Young, & Elliott 2019). The leading theory of how EGC went from the East Coast to the West Coast is ballast water. When genetically tested, these EGCs belong to the lineage on the East Coast (Klassen & Locke, 2007).

Since EGCs appeared in San Francisco, they have spread throughout British Columbia and Southeast Alaska. EGCs have spread over 1,000 km in less than 10 years, reaching the west coast of Canada by 1999 (Tepolt, 2009). The wide distribution of EGC points to the Davidson current, which runs along the California coast to the Washington coast, this current is the most

probable cause of invasion in 1997 and 1998. (Yamada, 2021). EGC reached Haida Gwaii in 2020. As of fall 2024 the Marine Planning Program at the Council of the Haida Nations has trapped over 1.3 million EGC (A. Brown, personal communication, December 10, 2024). On July 19th, 2022, EGC reached Southeast Alaska when the Metlakatla Indian Community discovered three EGC carapaces, during a survey of the Annette Island Reserve (NOAA, 2022). One month later, the count was up to 56 live EGC and 13 carapaces found on Annette Island. The current count is up to 4,366 EGC (I. Hudson, personal communication, December 10, 2024). Now that EGCs have an established population in Southeast Alaska, it is important to understand their impacts on the environment, culture and the economy in this region.

Environmental Impacts from EGC

Understanding the potential impacts of the EGC in Southeast Alaska will help direct how management practices and regulations are implemented. The EGC has been observed uprooting and disturbing seagrass and eelgrass beds. Seagrass beds serve a vital role in nearshore ecosystems, functioning as a nursery for many species in the area (Robinson et al., 2024). EGC uses this to its advantage by using the nursery as a hunting ground while uprooting it. EGC does this by burrowing into the sediment that the seagrass rests on and disrupting its anchor system. This habitat loss for native species can inhibit development into later stages of their lifecycle. This is particularly harmful for a few species struggling to survive due to other environmental pressures. One of these species, in particular, is the Dungeness crab (*Metacarcinus magister*).

While EGC has a smaller maximum size at maturity than Dungeness crab, competition for resources becomes an issue when juveniles have to compete with adult EGC. The EGC have also been observed to predate on Dungeness crab at certain life stages. Due to the species' similar diet and the EGC's aggressive behavior, juvenile Dungeness crabs are at a disadvantage

(McDonald, 2001). With the juvenile Dungeness crabs competing with, and being predated by the EGC, future recruitment becomes more challenging. This particularly worries Indigenous communities due to their reliance on Dungeness crab for food.

Cultural Impacts from EGC

Southeast Alaska is home to 19 federally recognized tribes and over 15,000 Indigenous people. The Tlingit, Haida, and Tsimshian are coastal people, relying on harvestable foods from the ocean, like Dungeness crab for millennia. In 2022, the Alaska Board of Fish adopted several proposals prohibiting the commercial catch of Dungeness crab in critical harvest areas near Klawock, Craig, Hydaburg, and Kasaan (I. Dundas, personal communication, November 11th, 2024). These communities cited increased commercial harvest and the presence of sea otters (*Enhydra lutris*) as the need to conserve Dungeness crab in these areas. The introduction of EGC into southeast Alaskan waters could amplify this issue. There will likely be a decline in the Dungeness crab population from the pressure brought on by the EGC, commercial harvesting, and sea otters. Due to EGC's generalistic feeding nature, several coastal species will likely be impacted. The Indigenous people of Alaska have historically harvested food from the shoreline as the primary food source, which is still essential for their culture today. While EGC has been a problem for Indigenous peoples, it has also caused issues for the shellfish industry on the East Coast and could impact Southeast Alaska.

Shellfish Fisheries Impacts from EGC

On the East Coast, the shellfish industry has been grappling with the effects of the EGC. There's speculation about how EGC will impact the shellfish industry in Alaska. Other regions have experienced higher concentrations of invasive EGC, which has harmed native species. One case study that shows the effects of EGC on a commercial fishery is the East Coast's softshell

clam (*Mya arenaria*) industry. Forty years ago, EGC were first identified in Maine disrupting the softshell clam industry, and since has lost nearly 75% of the average amount of clams harvested annually (Beal, 2018). While the EGC isn't the sole factor in this decline, research suggests its presence is a major contributor to the collapse.

While the impact of the EGC on Alaska's commercial fisheries is speculated, we can draw parallels from the effects seen in the softshell clam industry to predict outcomes for Southeast Alaska's four active primary shellfish fisheries. These fisheries are Dungeness crab, giant red sea cucumbers (*Cucumaria miniata*), geoducks (*Panopea generosa*), and red sea urchins (*Mesocentrotus franciscanus*). In recent years these commercial fisheries have yielded millions of dollars in revenue, as seen in Table 1. If the EGC were to successfully invade Southeast Alaskan waters, and have similar effects, like on the East Coast, we could see catastrophic impacts on these shellfish industries (Grosholz et al., 2011). If there were to be a

reduction of this scale in the Alaskan fisheries,

we would see a sharp increase in the local shellfish prices and fewer shellfish sold. This would cause local commercial harvesters to be

put out of business and deflate a robust shellfish economy. Due to the various potential negative consequences of an EGC invasion, mitigation strategies must be implemented to ensure the long-term stability of the Southeast Alaskan ecosystem.

Table 1: Most recent harvest and revenue annual data for various commercial shellfish industries in southeast Alaska (ADFG, 2024)

Common Name	Ave Ex-Vessel Value (USD)	Total Poundage (lb)
Dungeness Crab	\$6,893,542 (23-24)	3,249,829
Geoduck	\$6,094,054 (21-22)	507,415
Giant Red Sea Cucumber	\$8,480,659 (23-24)	1,639,237
Red Sea Urchin	\$9,807 (21-22)	13,841

Mitigating EGC with Public Education and Outreach

The rapid spread of EGC in Southeast Alaska stresses the importance of early detection and mitigation. Mitigating EGC can be difficult due to the complexities of the ecosystem in Southeast Alaska (DeBruyckere et al., 2023). Immediate action to mitigate EGC is critical to the

survival of native species. While complete eradication in most cases is out of the question for EGC, it's important to slow the invasion rate so the ecosystem can adjust. Increasing public awareness can help limit the spread of EGC. The public can help by reporting sightings of EGC to the invasive species hotline. Misidentification is a common problem when identifying EGC, as they vary greatly in size, shape, and color. Still, EGC can be identified using the pattern of spines on the EGC's carapace, with 5 spines on each side and 3 in the middle, often called the 5-3-5 method. The Washington Department of Fish and Wildlife published a lesson plan for 7th-grade classrooms on EGC using invasive species to teach students about their environment (Robinson et al., 2024). Using EGC in a classroom spreads awareness to students, and their families when they talk about what they learned. Teaching the public about human introduction and its environmental effects stresses the importance of enforcing strict regulations on contamination risks. While informing the public about this issue is important, direct mitigation methods are still necessary to inhibit the spread of EGC.

Regulating Ballast Water Exchange

Ballast water is one common way invasive species spread, and has been linked to the spread of the EGC. Strict regulations on ballast water exchange are necessary to decrease the chances of EGC contaminating local waters. Contamination from sediment and water in these ballast tanks could easily spread EGC (DeBruyckere et al., 2023). Vessels with shorter travel times increase the likelihood of significantly smaller larval organisms surviving the trip in ballast water. The National Invasive Species Act of 1996 (NISA) requires that open ballast water exchange in the US must occur 200 or more nautical miles offshore. There are a variety of exceptions, such as large oil tankers. Vessels that stay close to the Canadian shore as they travel in and out of Alaska and are within the exclusive economic zone aren't required to exchange in

specific locations or treat their ballast water (Davidson et al., 2009). Developing a management program for ballast water in Alaska and removing the tanker exemption from the NISA could slow the spread of EGC.

Early Detection Efforts of EGC Through eDNA

eDNA can be used in the early detection of EGC, which is a generally less labor-intensive and more cost-effective alternative to EGC detection. The Metlakatla Indian Community is in the early stages of using eDNA to detect EGC and are starting to see promising results (I. Hudson, personal communication, October 6, 2024). Significant amounts of EGC eDNA can be located in mud samples, where large chunks of DNA collect. High rates of eDNA can also be found in mud samples during major EGC spawning events (Crane et al., 2021). eDNA can also predict the population density of EGC, helping us focus mitigation efforts in areas with larger populations and detect EGC in ballast water (Keller, 2021).

Early Detection and Monitoring EGC Using Traps

Regular trapping in a suspected invasion range can aid in early detection and provide data on local crab populations before the introduction of EGC. Trapping is currently the most common method of mitigating the effects of EGC. The Metlakatla Indian Community natural resources crew uses traps and hand-picking to mitigate EGC. Since starting trapping in Metlakatla, there has been a noticeable decrease in the invasion rate of EGC (I. Hudson, personal communication, October 6, 2024). In most cases, trapping efforts only capture adult EGC and large juveniles, leaving small juvenile and larval crab. More research is needed to develop an efficient way to catch smaller EGC. If prevention and mitigation methods to remove EGC are ineffective, and a population becomes established, long-term mitigation will be necessary.

Commercial Harvest of EGC as a Means of Mitigation

There are many places in the EGCs native range with a crabbing industry. For example, The United Kingdom which has a substantial EGC fishery because of the huge market for soft-shelled EGC. It is considered a delicacy in Spain and Portugal which has caused them to overfish EGC to near-extinction in their waters (Mack et al.,2000). Also taking into account the huge Mediterranean green crab (*Carcinus aestuarii*) soft-shell market in the Venetian Moche industry which can retail for more than \$27USD/1b.

Seeing these markets in EGC's native range, there have been efforts to start EGC fisheries on the east coast of the US. Lobster fishermen and oyster farmers in Maine have started to fish EGC because they already have all the materials. They can supplement their incomes with an average of \$2-3 USD/1b for soft-shelled EGC. Though hard-shelled EGC are far less lucrative, most fishermen said they would capture them too for \$1 USD/1b, with the more experienced EGC harvesters accepting between \$ 0.22-0.35 USD/1b. This can be quite viable with companies like Purina using them in their eco-friendly pet food and possible markets opening up in fish foods and fertilizers. (Fulton & Fairchild, 2013)

EGC Biological & Genetic Control

Another method of control could be focused on EGC-specific biology. This could form in two ways, using native animals to put pressure on EGC or using Gene drivers to affect the population through the generations. After settlement, this could be one of the only ways to effectively deal with hard-to-reach sensitive areas—such as eelgrass beds.

The first possibility of biological control uses native species to provide predative pressure on EGC. Many crabs, mammals, and birds that hunt near the shore adapt to eat EGC. On the East Coast, more and more birds and marine mammals have been found targeting EGC (Kuris et al., 2005). Trying to 'teach' our native animal population to do so is unviable. However, it has been

found that red rock (*Carcinus productus*) and adult Dungeness crabs can outcompete EGCs, pushing them into more restricted, less productive territories. The caveat, EGCs outcompete juvenile Dungeness crabs, which can eat at the population from the bottom up. This poses a huge issue for our crabbing industry, as this is more likely to collapse Dungeness populations or cause stricter bag and possession limits. It is certain that sustaining and increasing Dungeness populations will boom if EGCs come.

The second possibility is gene control through either suppression or modification of gene drives. Gene drives use the understanding of RNA's replicating ability to replace specific parts of DNA with a different sequence—usually through CRISPR. Both drive systems have their own effects and cycles—shown in figure 1—which will need to be considered depending on the situation and geography. Many papers have been written on other related groups, such as insecta,

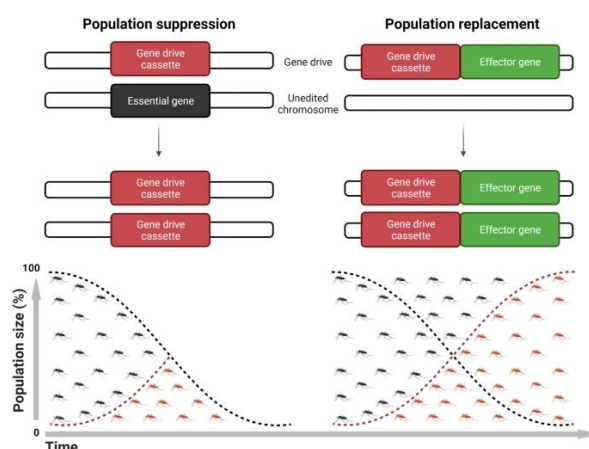


Figure 1: Shows the difference between suppression gene drives and modification (replacement) gene drives effects and strategies to change a specific population. (Naidoo et al, 2024)

crustacea, and portunidae. (Bier, 2022) Taking these papers as evidence that crabs can be modified could open the doors for intense EGC genetic research.

Suppression gene drives are great for closed environmental systems but would not be helpful in an open system where wild zoeal would just repopulate the area. For suppression drives, ‘supermales’, which are YY males or have X-shredding, which shreds the males X chromosome before mating, would leave almost all of their progeny as males (Ewers-Saucedo, 2019). One way this is achieved is using the highly-conserved (the allele doesn't break down) guide RNA site in the doublesex (dsx) gene, which is required for proper female development

(Erickson et al., 2023). This gene has been found in mud crabs (*Scylla serrata*) which are in the same family (Portunidae) which gives a logical basis to look for the same gene sequence in EGCs. Another suppression system is the Trans-complementing drive. This is when separate modifier gene drives are released into the population, which when both are present, causes the crab to be sterile (Abuhagr et al, 2014). This reduces the chances of mutating out because individually they have no fitness cost and can then spread throughout the population before sterility occurs.

Modifying gene drives might be a better solution for open, hard-to-reach systems. Modifying gene drives can be implemented without fitness costs, but can affect their size, behavior, shell strength, etc (Wedell et al., 2019). Using trans-complementing M-gene drives could make EGC populations, especially in areas we can't actively mitigate, less effective at hunting food than native crabs. More research is needed on how modifying and suppressing gene drives could be implemented for EGCs. More specifically, what locations would be the most effective for mitigation, and the most cost-effective method to mass produce modified EGCs.

Conclusion

Ultimately, EGC poses a significant problem to Alaska's coastal areas and requires preventive action as soon as possible to protect these ecosystems. As we explored the background of EGC, their ability to adapt to new environments and spread vastly through human interaction and ocean currents contextualizes the spread of EGC up the southeast Alaskan coastline. Their presence is also linked to the decline in seagrass beds, which are critical habitats for many organisms. The introduction of invasive EGC in non-native areas is shown to decrease the populations of various native species, eventually leading to an overpopulation of EGC and the indefinite disruption of the marine ecosystem. This threatens commercial and subsistence

fisheries, seriously affecting Alaska's economy and Indigenous communities. The Indigenous communities that depend on subsistence fisheries are culturally intertwined with coastal ecosystems, and the threat of EGC can lead to them being stripped of their traditions and way of life. Mitigation efforts are a necessity to address these ecological, economic, and cultural impacts. Though the complete eradication of EGC in a specific area is highly unlikely, many efforts are currently being incorporated to slow the spread and reduce the harm done to an ecosystem being invaded. Current mitigation strategies, such as using eDNA to identify EGC in specific areas and trapping to limit their spread, are being implemented. These efforts aim to prevent the further spread of these invasive species and reduce their impact. If these preventative measures fail to properly address the problem, long term mitigation will be the next course of action. Using traps across a wide range of shapes and sizes will play a huge part in preventing EGC from creating ecological damage. Furthermore, marketing EGC in the food industry can also become a very promising long-term mitigation strategy in the future, increasing the demand for these species and, consequently, the excessive removal of them from coastal ecosystems. Ultimately, EGC are spreading up the coast of southeast Alaska, posing many threats to diverse ecosystems that are vital to the state's economy and cultural identity. By using various methods of mitigation grounded in western science and Traditional Ecological Knowledge, Alaska can take a step toward preserving its coastal environments, maintaining the livelihoods of native populations, and the prosperity of these environments.

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Metlaktla Indian Community Natural Resources Crew for showing us the EGC issue on Annette Island as much of it was inspiration for our research paper. Furthermore, we would like to thank Iphigenia Arvanitis at the Ketchikan Indian Community Cultural Resources Department for sharing her insights to the EGC issue in Southeast Alaska as well. We would also like to thank our paper reviewers Anna Laffrey and Kayle Widmyer. The team would also like to thank those who supported us through chaperoning trips this season which include: Adelina Robinson, Mischa Chernick, and Jason Chernick. Additionally, the support from the staff of Ketchikan High School and the Ketchikan School Gateway Borough School District was critical to the success of our team this season. Finally, this season could not have happened without the generous support from our sponsors: OceansAlaska, Allen Marine Tours, Central Council Tlingit & Haida Indian Tribes of Alaska, Alaska SeaGrant, Trident Seafoods, Fishes & Dishes, Holland America Cruise Lines, the Ketchikan Indian Community, Homestead Skiffs, Dawson Construction, Hawaii SeaGrant, the Coral Resilience Lab at the Hawaii Institute of Marine Biology, the Alaska Chapter for the American Fisheries Society, and the Southern Southeast Regional Aquaculture Association. We greatly appreciate the support from these entities.

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Phil Doherty
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October 8, 2026

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve the fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery.

The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to ACR 13 which would establish a statewide Chinook salmon retention and disposition reporting standard for commercial salmon fisheries.

SEAS does not agree that one statewide regulation considers all the complexities of the numerous regions and commercial fisheries in Alaska.

The commercial harvest of chinook salmon in southeast Alaska common property fisheries for troll, purse seine and gillnet gear is 100% dictated by the Pacific Salmon Treaty.

According to ADF&G the chinook fishery for the commercial purse seine harvest is as follows:

CHINOOK SALMON HARVEST

ADF&G is required to manage the SEAK purse seine fishery for a maximum harvest of 4.3% of the annual all-gear Chinook salmon harvest ceiling determined under the terms of the Pacific Salmon Treaty (5 AAC 29.060 [b][1]).

For example, in 2026, the all-gear PST Chinook salmon allocation is 207,400 treaty Chinook salmon. The all-gear harvest limit for 2026 includes a 1% reduction that will serve as a buffer to avoid exceeding the all-gear limit and payback provisions within the PST. The 2026 purse seine treaty Chinook salmon allocation is 8,800 fish. The need for management measures to comply with the purse seine allocation will depend on in season evaluation of Chinook salmon harvest and abundance.

The BOF has adopted size limits for Chinook salmon (5 AAC 33.392) and directed ADF&G to manage the purse seine fishery such that incidental mortality from catch-and-release is minimized.

The following are specific provisions for management of the purse seine fishery harvest of Chinook salmon: 1. Chinook salmon taken in the purse seine fishery that are less than 28 inches in length (as measured from the tip of the snout to the tip of the tail) will not be counted against the Chinook salmon harvest quota. 2. Chinook salmon less than 28 inches in length may be harvested by purse seine fishers but not sold.

All retained Chinook salmon must be reported on fish tickets as personal use (harvest code 95). Commercial, sport, personal use, and subsistence fisheries will be restricted throughout SEAK to conserve Chinook salmon. Chinook Salmon Nonretention Management actions taken in the purse seine fishery to conserve SEAK Chinook salmon and stay within the harvest limits outlined in the PST will be restrictive in 2026.

Nonretention of Chinook salmon 28 inches or larger will likely be in place for most of the 2026 purse seine season. Chinook salmon retention periods will be dependent on areas open to directed pink salmon fisheries, the magnitude of pink salmon harvest, and the expected Chinook salmon harvest per opening.

A conservative approach in 2026 will be necessary to keep Chinook salmon harvest within the purse seine allocation. When under nonretention of Chinook salmon 28 inches or larger, purse seiners are encouraged to quickly release Chinook salmon in a manner that minimizes mortality. If during nonretention, Chinook salmon greater than 28 inches are retained, the fisher is in violation and may be issued a citation. Retained Chinook salmon must be donated, and the fisher may be subject to the cost associated with processing the fish for donation.

Any changes to the chinook fishery in SE AK would require the concurrence of the Pacific Salmon commission.

Phil Doherty

Executive Director SEAS



The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to ACR 3.

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve the fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery and a robust and healthy hatchery program that is designed to minimize wild stock interactions and enhance fisheries.

- The Private Non-profit hatchery programs are stakeholder driven and overseen by fishermen who strongly support Alaska's mandate to protect wild stocks.
- In SE AK, hatchery genetic policies prioritize using local broodstock to maintain genetic diversity within wild salmon populations, meaning hatcheries primarily collect eggs from fish originating in nearby streams to minimize genetic impacts on wild stocks when hatchery fish stray back to spawn; this is done to protect the integrity of wild populations and is a key component of the Alaska Department of Fish and Game's (ADF&G) broader genetic policy for salmon hatcheries.
- The highest priority of the Alaska hatchery programs is to protect and maintain wild stocks. All common property fisheries in SE AK are targeted on wild stocks. Hatchery produced salmon are caught incidentally during those common property fisheries. The only targeted fisheries for hatchery salmon are conducted in the Terminal Harvest Area.
- In SE AK there is an allocation plan in place for the distribution of hatchery fish (5AAC 33.364). The troll fishery is below their allocation, the gillnet fishery is above their allocation, and the seine fishery is within their allocation. The allocation regulation is based on historical hatchery production. If there are significant changes to hatchery production the Board of Fish will have to re-exam the allocation plan.
- Colonization (or straying) is a natural part of the salmon life cycle, so hatcheries are required to use locally adapted stocks from nearby rivers and streams to maintain the natural genetic mixing of salmon populations within an area.
- There is some "straying" in wild stock salmon. Is the rate of "straying" in hatchery produced salmon any different than in wild stocks?

- Reduction of hatchery produced salmon would put extra pressure on wild stocks. ADF&G salmon managers would have to deal with more boats fishing in common property fisheries as those boats may not have the option of fishing in Terminal Harvest Areas during common property fisheries.
- Alaska's salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations.
- Reducing hatchery production to less than 100 million eggs annually would have negative economic consequences for all user groups, processors, and communities in SE AK. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact numerous SE AK charter operations and lodges.
- Cutting production of pink and chum salmon would significantly reduce these revenue streams making it difficult, if not impossible, to meet State of Alaska Fisheries Enhancement Revolving Loan Program repayment obligations.
- Reduced production would be a financial burden on hatchery operation. Hatcheries may be forced to eliminate more expensive programs that produce chinook, coho, and sockeye salmon.
- There is no evidence that these significant reductions will do anything to address unknown wild salmon interaction concerns addressed by the proposer of ACR 3.

Sincerely,



Phil Doherty
Executive Director – SEAS
PO Box 6238
Ketchikan, AK 99901



Southern Southeast Regional Aquaculture Association, Inc.
 14 Borch Street, Ketchikan, Alaska 99901
 (907) 225-9605 www.ssraa.org

October 13, 2026

Alaska Department of Fish and Game
 Alaska Board of Fisheries
 Submitted via online form

RE: Opposition to ACR 3

Dear Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries:

Thank you for the opportunity to comment on the Agenda Change Requests (ACRs) before the Board at its October work session in Anchorage. The Southern Southeast Regional Aquaculture Association (SSRAA) is a regional nonprofit salmon hatchery organization incorporated in 1976. SSRAA is governed by a 21-member Board of Directors representing a cross-section of regional salmon users, communities, and members of the public. Our mission is to *“enhance and rehabilitate salmon production in Southern Southeast Alaska to the optimum social and economic benefit of salmon users.”*

SSRAA opposes ACR 3, which seeks to reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually. SSRAA maintains that this request does not meet the criteria for an Agenda Change Request for the following reasons.

Does this serve a conservation purpose or reason?

No. There is no demonstrated causal relationship between Alaska hatchery production and unmet pink salmon escapement goals in Prince William Sound, Chignik, or Area M. In contrast, Southeast Alaska met or exceeded pink salmon escapement goals in all three subregions, as well as summer-run chum salmon escapement goals in all three subregions. Additionally, District 13 experienced its fourth-largest pink salmon harvest since 1985, with several individual statistical areas reporting record-high harvests despite the presence of hatchery production. Salmon abundance naturally fluctuates in response to a variety of ocean and freshwater conditions. These factors must be considered before attributing lower returns in Prince William Sound, Chignik, and Area M to hatchery production.

Year after year, the Board of Fisheries dedicates considerable time and resources to reviewing similar proposals, often without new scientific evidence to support the proposed restrictions. SSRAA supports limiting consideration of these proposals to the Statewide Finfish meeting cycle, allowing for a more efficient and informed review process. Furthermore, SSRAA believes management decisions should be guided by sound science and looks forward to the findings of the Alaska Hatchery Research Program (AHRP), which represents years of significant investment and research by ADF&G.

Does this correct an error in regulation?

No. The request does not identify an error in an existing regulation that warrants correction through the ACR process.

Does this correct an effect on a fishery that was unforeseen when a regulation was adopted?

No. The request does not identify an unforeseen effect resulting from the adoption of an existing regulation. Rather, adoption of the proposed restrictions would create significant and lasting social and economic consequences for SSRAA, other hatchery associations, commercial and sport fisheries, associated businesses, and subsistence and personal-use fishery participants.

Is the proposal predominantly allocative?

No.

As SSRAA celebrates its 50th anniversary this year, an updated economic impact study highlights the substantial contributions of our salmon enhancement programs to the economy of southern Southeast Alaska. The study estimates that SSRAA generates \$112.3 million in annual regional economic output, including \$27.5 million from commercial fishing and \$27.3 million from sportfishing. Between 2021 and 2025, SSRAA produced an average of 4.1 million returning adult salmon annually, supporting commercial fisheries, seafood processing, recreational fishing, and hatchery employment. Approximately 1,300 individuals earn at least a portion of their annual income from SSRAA-related activities, including 400 commercial fishermen, 580 seafood processing workers, 230 sportfishing industry employees, and 84 hatchery workers. These findings underscore the importance of SSRAA's hatchery production to the regional economy and the fishing communities that depend on it.

Since April, SSRAA has been working with the Commissioner of the Alaska Department of Fish and Game to formalize a moratorium on increases to permitted pink and chum salmon egg-take capacity. Under the proposed agreement, SSRAA would commit to maintaining its permitted chum salmon egg-take capacity at 2019 levels and would not seek increases to those limits. SSRAA has no plans to expand its permitted chum salmon production or introduce pink salmon production into its programs for the foreseeable future.

For these reasons, SSRAA respectfully requests that the Board of Fisheries deny ACR 3. The proposed restrictions do not meet the criteria for an Agenda Change Request and would have far-reaching consequences for Alaska's hatchery programs and the fisheries and communities they support. Proposals of this magnitude warrant consideration through the regular Board of Fisheries process, informed by the best available scientific research.

Sincerely,



Tessa J. Frost

General Manager

Southern Southeast Regional Aquaculture Association



TERRITORIAL SPORTSMEN

Representing The Sporting Lifestyle of Southeast Alaskans

October 1, 2026

State of Alaska
Department of Fish and Game
Board of Fisheries
RE: Oppose ACR 3

Dear Board of Fisheries Members:

We are Territorial Sportsmen Inc, the largest Juneau based non-profit representing sportsmen in the Juneau area with approximately 1,100 members. We advocate on behalf of Juneau sportsmen, maintain state cabins in the Juneau area, and support hunter education / shooting sports through donations as well as participation on the Hank Harmon Range Board.

We are writing to express our opposition to ACR 3. We believe that hatcheries play an important role in salmon fisheries across the state. While we understand some areas of the state are experiencing depressed salmon returns, we fail to see how this proposal would address these issues.

This proposal seeks an approximate 95% reduction in hatchery releases (based on the 1.9B release figure cited). Given that general scientific consensus is that environmental factors are the biggest influence on salmon returns, we question whether such drastic action would have the desired impact on wild salmon numbers. That said, we are certain that if this proposal were to pass, there would be major negative impacts on commercial, sport and personal use fisheries across a wide swath of the state.

We urge you to not support this proposal.

Thank you.

A handwritten signature in black ink, appearing to read "Shawn Hooton", is written over a horizontal line.

Shawn Hooton, President
Territorial Sportsmen, Inc.
907-723-4668; shawn@semicro.com



UNITED FISHERMEN OF ALASKA

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October 8, 2026

Chair Carlson-Van Dort
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: UFA's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session, October 28 - 29, 2026

Dear Chair Carlson-Van Dort,

United Fishermen of Alaska (UFA) is a commercial fisheries trade association representing 37 commercial fishing organizations and independent fishermen who participate in the state and federal fisheries off Alaska. UFA appreciates the opportunity to address out-of-cycle needs through Agenda Change Requests (ACR) to the Board of Fisheries (Board). While ACRs provide ADF&G staff with the ability to address management needs for our fishery resources out-of-cycle, it is extremely important this exception is only used by the Board when the criteria for accepting ACRs is clearly met.

UFA's comments are based on the following ACR criteria:

The Board's ACR policy¹ provides that:

- (1) the board will accept an agenda change request **only** [emphasis added]
 - (A) for a fishery conservation purpose or reason;
 - (B) to correct an error in a regulation; or
 - (C) to correct an effect on a fishery that was unforeseen when a regulation was adopted;
- (2) **the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information found by the board to be compelling;** [emphasis added]

United Fishermen of Alaska's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session

UNITED FISHERMEN OF ALASKA'S COMMENTS ON ACRS 3, 6, 7, 8, 9, 10, 11, AND 13

ACR 3: Reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually (5 AAC 40.XXX)

A: Does this serve a conservation purpose or reason? **No.** There is no evidence that correlates current permitted hatchery egg take levels and the decline of Alaskan wild salmon stocks. Hatchery programs have been in place for 50 years, in which time Alaska has experienced both abundance and scarcity. The inference that hatchery production is the primary cause of low salmon returns statewide fails to consider that 2026 was a historic low only in the regions listed. The Southeast Region of Alaska met or exceeded escapement goals for all three subregions for pink salmon, and all three subregions for summer-run chum salmon. Additionally, District 13 saw the 4th largest pink salmon harvest since 1985 with multiple individual statistical areas in District 13 experiencing an all-time high pink salmon harvest which also supports salmon hatchery production. Observations throughout many coastal regions are likely therefore a result of normal cycles of abundance due to poor ocean conditions which affected both wild and hatchery origin salmon.

The Board spends time and resources on similar proposals year after year without new information being presented. UFA supports the plans to limit these proposals to be considered in the statewide Finfish cycle and is waiting for the information forthcoming from years of investment and research by ADF&G from the Alaska Hatchery Research Program (AHRP).

B: Does this correct an error in regulation? **No.** There is no regulation by which the board can adopt this proposal. UFA questions whether the board has the authority to limit hatchery permits. Therefore, this proposal cannot address errors in regulation but instead requests a new regulation to limit hatchery permits to include all species in all hatchery programs statewide.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** However, adoption of this proposal would create immediate and lasting social and economic harm to the hatchery associations and all commercial and sport fisheries, businesses, and subsistence and personal users of the resource. The closure of Private Non-Profit (PNP) hatcheries, as a direct result of this proposal, and the

United Fishermen of Alaska's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session

resulting bankruptcy of commercial fishermen who rely on the hatchery production for their livelihood will be severe.

Is the proposal predominantly allocative? **No.** This proposal is not predominantly allocative.

ACRs 6 and 7: Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear in the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365).

A: Does this serve a conservation purpose or reason? **No.** This proposal looks to add extended time and area closures to commercial fishermen participating in the Area M seine and gillnet fisheries. The adoption of this proposal could lead to the erasure of the voluntary, fleet-wide dynamic management tools used for chum hotspot reporting that has significantly decreased the harvest of chum salmon in the June fishery. By compressing the time fishermen are allowed to harvest, it could make it harder for the fishermen to afford the voluntary stand downs during periods of high chum abundance.

B: Does this correct an error in regulation? **No.** This proposal looks to reintroduce a proposal from the 2025/26 BOF cycle (Proposal 127, RC245) that was originally adopted by the Board but reversed by the State's Attorney General. This proposal would throw away the work done in past years for the industry and Department to work together to find the most responsive and effective management strategies for decreasing chum harvest in the June fishery.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** The adoption of this proposal could lead to the erasure of the voluntary, fleet-wide dynamic management tools used for chum hotspot reporting that has significantly decreased the harvest of chum salmon in the June fishery. By compressing the time fishermen are allowed to harvest, it could make it harder for the fishermen to afford the voluntary stand downs during periods of high chum abundance.

Is the proposal predominantly allocative? **Yes.** This proposal would significantly restrict commercial harvest opportunity in the South Unimak and Shumigan Islands June fishery for a potential increase in returns to other users. This same proposal was indicated as allocative in the staff comments for the February 2026 Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting.

United Fishermen of Alaska's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session

ACR 8: Amend the *Post-June Salmon Management Plan for the South Alaska Peninsula* to enforce king salmon caps with reductions in commercial salmon fishing time in the South Alaska Peninsula (5 AAC 09.366).

A: Does this serve a conservation purpose or reason? **Yes.** This proposal looks to reinstate a proposal from the 2025/26 Board cycle (proposal 141) that was overturned by Alaska's Attorney General that would institute Chinook harvest triggers. While the Department has gone ahead and instituted in-season harvest triggers and closures for Chinook in the Shumigan District, the proposal looks to go further than the Department did, with additional triggers and extended closure periods, beyond the actions that in season management had instituted.

B: Does this correct an error in regulation? **No.** This proposal attempts to reinstate a proposal (proposal 141, 2025/26 cycle) that would add new management measures to the *Post-June Salmon Management Plan for the South Alaska Peninsula*.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** As stated in Staff Comments for the February 2026 meeting, the AK Peninsula salmon fisheries have always been understood to be mix stock fisheries and have been managed as such. Through in-season management action, the Department has shown that it is willing and able to take responsive Chinook salmon conservation measures under their current management framework.

Is the proposal predominantly allocative? **Yes.** This proposal could restrict the status quo commercial harvest for the potential benefit of other user groups. The original proposal from the 2025/26 cycle, 141, was deemed to have an allocative nature in the staff comments for the meeting.

ACR 9: Reduce maximum gillnet depth in the Alaska Peninsula Area to 70 meshes (5 AAC 09.331).

A: Does this serve a conservation purpose or reason? **No.** This proposal looks to restrict the mesh depth of gillnets, reducing the total fishable gear by depth in the water column for both the drift and set gillnet fishermen. According to Staff Comments for the February 2026 Board meeting, the Department does not have data on the migration pattern of salmon by depth in this region. The Department determined this will likely lead to a reduction in harvest of salmon, but do not know if it would be a species-specific reduction.

United Fishermen of Alaska's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session

B: Does this correct an error in regulation? **No.** This proposal simply looks to reinstate proposal 147 (RC161) from the 2025/26 Board Cycle that was later overturned by Alaska's Attorney General.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal would instead change gear regulations that have been in place for over 30 years.

Is the proposal predominantly allocative? **Yes.** This proposal looks to reduce commercial opportunity for the potential benefit of other user groups. This proposal was deemed to have allocative aspects by the Department in the February 2026 Staff Comments.

ACR 10: Amend Alaska Peninsula Area seine specifications to reduce net size (5 AAC 09.332).

A: Does this serve a conservation purpose or reason? **No.** This proposal looks to restrict seine depth and length. According to Staff Comments for the February 2026 Board meeting, the Department does not have data on the migration pattern of salmon by depth in this region. The Department determined this will likely lead to a reduction in harvest of salmon, but do not know if it would be a species-specific reduction.

B: Does this correct an error in regulation? **No.** This proposal simply looks to reinstate proposal 148 (RC208) from the 2025/26 Board Cycle that was later overturned by Alaska's Attorney General.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal would instead change gear regulations that have been in place for over 30 years.

Is the proposal predominantly allocative? **Yes.** This proposal looks to reduce commercial opportunity for the potential benefit of other user groups. This proposal was deemed to have allocative aspects by the Department in the February 2026 Staff Comments.

ACR 11: Prohibit discard of Chinook salmon caught in purse seine gear in the Alaska Peninsula and Chignik areas (5 AAC 09.373 and 5 AAC 15.364).

United Fishermen of Alaska's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session

A: Does this serve a conservation purpose or reason? **No.** This proposal instead looks to remove a conservation tool that was recently instituted in the last Board Cycle. This proposal would remove the fleet's ability to return live Chinook back to the ocean when they are brought on board in the seine. This would lead to a 100% mortality rate in the Area M seine fishery.

B: Does this correct an error in regulation? **No.** This proposal looks to rescind a proposal that was adopted in the 2025/26 Board Cycle (Proposal 135, RC149) that gives the department a tool to reduce Chinook mortality.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.** This proposal would only reduce the Department's ability to curb Chinook mortality.

Is the proposal predominantly allocative? **No.** This proposal would only remove conservation-based management tools that are common in other seine fisheries throughout the State.

ACR 13: Establish a statewide Chinook salmon retention and disposition reporting standard for commercial salmon fisheries (5 AAC 39.130).

A: Does this serve a conservation purpose or reason? **No.** This proposal would increase Chinook salmon mortality Statewide and undermine the conservation efforts implemented by the Board in several regions of the state. For example, in Southeast, the Taku River Chinook salmon stock has rebounded and will likely be recommended for de-listing in 2028. For the troll fishery in Southeast, required retention would change the size and age composition of the fishery and possibly impact treaty obligations with Canada. Prohibition on the retention of Chinook salmon is used in many commercial fisheries conservation tools to remove all incentives for a vessel to catch these fish.

B: Does this correct an error in regulation? **No.** This would instead remove the Department's ability in many fisheries and regions of the State's ability to decrease Chinook salmon mortality.

C: Does this correct an effect on a fishery that was unforeseen when a regulation was adopted? **No.**

Is the proposal predominantly allocative? **No.**

United Fishermen of Alaska's Comments on ACRs 3, 6, 7, 8, 9, 10, 11, and 13 for Board of Fisheries Work Session

In closing, UFA agrees with the comments provided by ADF&G, and does not believe any of the ACRs submitted to this meeting meet the criteria for acceptance.

Sincerely,



Matt Alward
President



Thatcher Brouwer
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association •
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn • Groundfish Forum • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association •
Northern Southeast Regional Aquaculture Association • Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William
Sound Aquaculture Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation
Alliance • Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern
Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association



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USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

October 9, 2026

United Southeast Alaska Gillnetters is a fishery advocacy group dedicated to representing the interests of 473 drift gillnet permit holders. We would like to offer the following comments regarding ACR 13.

Conservation as criteria- Our familiarity with the Pacific Salmon Treaty leads us to believe that, for SEAK, there will be no tangible effect for Alaska stocks if this proposal were accepted. This proposal is either ignorant of, or ignoring the fact that Alaska has an allowable catch determined each year for chinook by the Pacific Salmon Commission. Having 100% retention for the seine and troll fleets would result in those fisheries being shut down for all other species once the hard number was achieved. This would close, shorten, and restrict both of these fisheries, something the proposer claimed wouldn't be a result of this proposal. As all of you know, SEAK commercial, sport, personal use, and subsistence fisheries have all been heavily restricted since 2018 in an effort to meet escapements in Alaska and transboundary rivers. These restrictions take place in a time frame when those spawners are transiting to their natal rivers. The majority of fish caught after that time frame are non-Alaskan chinook, bound for the Columbia and other southern rivers. In effect, this would actually do more to conserve someone else's fish, while decimating the largest resource extraction industry in the SE region. If the intent of this proposal was conservation, why is the retention restricted to commercially caught fish? It would seem fairer if sportfish also had 100% retention up the daily/annual limit. This would eliminate catch and release fisheries, which do have a mortality associated with them.

To correct an error in regulation- The proposers point out that current regulations are inconsistent. Alaska is a big state, and each region has its own management concerns, along with different gear types, user groups, and river dynamics. Having a uniform standard for the entire state makes little sense, and should be addressed specifically within a region, and taken up at that regional meeting.

Allocative questions- While the proposer claims this proposal is not allocative, we would offer that it is, as the retention is only on the commercial fleet. While sport would not gain in number of fish, their fishery would continue as it always has, while commercial would be shut down. While the intent is not allocative, it would appear the results of this could be, as the commercial fleet would lose value, and opportunity for other salmon.

We believe the board should deny this request. This is a blanket regulation that has not taken all the information into account before they made the proposal. The proposer seems focused on WAK, and while they may have knowledge of the circumstances there, they have little understanding of management in other regions. One size doesn't fit all, and they would be better served to address their issue in a proposal limited to their area of expertise.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', with a stylized, flowing script.

Max Worhatch, Executive Director



Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

October 9, 2026

United Southeast Alaska Gillnetters is a fishery advocacy group dedicated to representing the interests of 473 drift gillnet permit holders. We would like to offer the following comments regarding ACR 3.

This proposal requests the Board of Fisheries create a new regulation to reduce or alter a hatchery permit. This has been demonstrated to be beyond the authority of the board, and is why we have seen numerous proposals like this over the last decade fail.

Conservation is the only listed criteria by the proposer. Ocean carrying capacity has been cited, blaming failure of wild salmon runs throughout the state to hatchery fish. Before we had any meaningful hatchery production, the state went through a window in time where our wild returns were very poor. So poor in fact, that commercial fishermen voted to tax themselves to produce hatchery fish to add some stability and value to our catch. While some salmon runs in the state are under performing, many are doing well. Bristol Bay comes to mind. SEAK has some stocks of concern, but recently the Chilkat River Chinook SOC was lifted, as returns have improved immensely. Taku River has had two good returns in a row, and the Stikine has also shown improvement the last couple of years. McDonald Lake Sockeye SOC will be discussed and likely lifted in the next Southeast regional meeting in 2028. Southeast has the most hatchery fish in the state, yet is still producing vibrant wild runs. Ocean survival fluctuates and there is no silver bullet identified as an overriding cause for poor returns. Ocean survival is a broad term, as predation by mammals, both for out migrating and returning salmon, is at an all-time high. Predation by other fish, such as black cod and hake is also thought to be a major contributor. Magister squid populations in the gulf are likely to impact returns. The carrying capacity of the ocean is an unknown, and probably fluctuates year to year, region to region, and is likely associated with water temperatures and long-term weather patterns. We feel that picking out one possible contributor, especially in such a draconian fashion, that would bankrupt regional

hatcheries and diminish the value of commercial salmon fisheries across the state, would be irresponsible.

We would ask the Board to deny this request for an agenda change. We feel the conservation criteria has not been met, and the proposer did not offer any other arguments for other criteria.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', with a stylized, flowing script.

Max Worhatch, Executive Director

P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com



October 13, 2026

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: ACR 3 - Reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually (5 AAC 40.XXX).

Dear Chair Carlson-Van Dort, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments on matters before the board at its 2026 work session. The Valdez Fisheries Development Assoc., Inc. (VFDA) provides the following in **opposition to Agenda Change Request (ACR) 3**.

The Board's adopted policy to hear ACR's states that:

1) the board will accept an agenda change request only;

(A) *for a fishery conservation purpose or reason;* –

Does not meet. ACR 3 fails to establish a credible conservation purpose or reason. Alaska's hatchery production cannot be scientifically linked to periodic low salmon returns experienced this year in some regions of the state. The proposal provides no data to support assertions of wide ranging unmet escapement goals for any species. Further, it speculates wildly that the production of hatchery fish is the primary cause of low salmon returns, when the long history of hatchery production shows no correlation to any sustained decline of any species. Low returns this year are most likely due to normal cyclical variations in oceanographic and atmospheric conditions or predation, which affected not only wild salmon but hatchery origin salmon as well.

(B) *to correct an error in a regulation;* or – Does not meet.

(C) *to correct an effect on a fishery that was unforeseen when a regulation was adopted;* – Does not meet.

ACR 3 fails all three criteria to be adopted by the board and must be **rejected**.

In closing, VFDA supports the board's efforts to efficiently use the board's, department's, and public's time to hear hatchery related proposals. We support hearing production related proposal only during Statewide Finfish meetings, and regionally only when proposals relate to allocation or fishery management of individual hatchery programs.

Thank you for your consideration.

Sincerely,

Mike H. Wells
Executive Director

Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To
R26081

OCT 13 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

We write to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments on Agenda Change Requests (ACRs) being considered at the upcoming Alaska Board of Fisheries (BOF) Work Session. During our October 6-7, 2026, meeting in Fairbanks, we voted to submit Council comments as noted below.

The Council voted unanimously that the following ACRs **should be taken up out of cycle for conservation reasons** in alignment with the criteria specified in 5 AAC 39.999. Additional comments will be submitted to the appropriate meeting when these requests are accepted for further deliberation by the BOF.

- **ACR 3 - Reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually**

The State of Alaska is required to manage all wild stocks, including salmon, according to the sustained-yield principle and is obligated to maintain their health and long-term viability. A growing body of scientific evidence indicates that hatchery-reared salmon compete with wild salmon for resources and affects the diet, growth, fecundity, productivity, and abundance of wild salmon and other marine species. Hatchery production should; therefore, be reduced to improve the prospects for the health and survival of vulnerable wild salmon stocks.

- **ACR 7 – Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear in the South Unimak and Shumagin Islands June Salmon Management Plan**
- **ACR 8 – Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to enforce king salmon caps with reductions in commercial salmon fishing time in the South Alaska Peninsula**
- **ACR 9 – Reduce maximum gillnet depth in the Alaska Peninsula Area to 70 meshes**
- **ACR 10 – Amend Alaska Peninsula Area seine specification to reduce net size**

- **ACR 11 – Prohibit discard of Chinook salmon caught in purse seine gear in the Alaska Peninsula and Chignik areas**

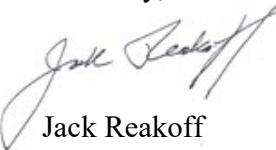
These ACRs ask that the BOF revisit actions it previously approved but never implemented, which are now necessary to address critical conservation needs. Action on these ACRs would allow more salmon to return to their natal streams in Western Alaska, of which many stocks are not meeting subsistence needs, escapement goals, and in the case of the Yukon River, Treaty promises made to Canada.

- **ACR 13 – Establish a statewide Chinook retention and disposition reporting standard for commercial salmon fisheries**

Action on this ACR is needed to fill data gaps about actual exploitation rates of Chinook Salmon in these fisheries. There are few, if any, healthy Chinook Salmon populations remaining in Alaska, and better harvest data would support more informed fisheries management decisions.

Thank you for considering our comments on the above ACRs. If you have any questions or would like to follow up, please contact us through our Subsistence Council Coordinator Nissa Pilcher, at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff
Chair

cc: Federal Subsistence Board
Western Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

Name: William William

Mr. Myself

Community of Residence: PETERSBURG

I oppose acr 13