

# MATANUSKA-SUSITNA BOROUGH Fish & Wildlife Commission

350 E Dahlia Ave., Palmer, Alaska 99645

**CHAIRPERSON**  
Peter Probasco

**VICE CHAIR**  
Andy Couch

**MSB STAFF**  
Paul Clark



**BOARD MEMBERS**  
Michael Bowles  
Marty Van Diest  
Gabe Kitter  
Bill Gamble  
Kendra Zamzow  
*Ex officio:* Jim Sykes

**Regular Meeting**  
March 12, 2026

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**Pg. = Item:**

- 1 = New Healthy Watershed Initiative Poster
- 2 = Proposal 186 Amendment from MVFGAC
- 3 = Andy's 3.13.26 Frontiersman Article
- 5 = FWC Plan for BOF Public Testimony
- 15 = HB203 Support Letter (Final)
- 17 = FWC Comments to BOF (Final)



**MAT-SU BOROUGH**

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## Amendment to proposal 186 offered by Matanuska Valley Fish and Game Advisory Committee

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From Andy Couch <fishing@fish4salmon.com>

Date Thu 2/26/2026 10:28 PM

To Paul Clark <Paul.Clark@matsugov.us>

**[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]**

As mentioned at the Feb. 26 FWC meeting below is the amendment to Proposal 186 / Central District Drift Gillnet Fishery Advisory Committee:

Amendment to Draft Gillnet Fishery Management Plan Proposal 186 by the Matanuska Valley Fish and Game Advisory Committee on Feb. 25:

h. **Following the purpose of this plan, the Commissioner may further restrict Central District commercial drift gillnetting under this plan, when the coho salmon spawning escapement projection at Deshka River, Little Susitna River, or another Northern Cook Inlet ADF&G salmon indices falls below the mid-point of the applicable SEG range as provided in 5AAC 21.363(e).** [THE COMMISSIONER MAY DEPART FROM THE PROVISIONS OF THE MANAGEMENT PLAN UNDER THIS SECTION AS PROVIDED IN 5 AAC 21.363(e).]

Andy Couch  
Fishtale River Guides  
(907) 746-2199  
[fishing@fish4salmon.com](mailto:fishing@fish4salmon.com)

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## Mat-Su Anglers column for March 12, 2026 Frontiersman --first edit / lightly proofed

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From Andy Couch <fishing@fish4salmon.com>

Date Tue 3/10/2026 9:25 PM

To Jeremiah Bartz <jeremiah.bartz@frontiersman.com>; katie.stavick@frontiersman.com  
<katie.stavick@frontiersman.com>

### [EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Mat-Su Anglers Column for Friday March 12, 2026 Frontiersman Newspaper

#### Statewide Board of Fisheries Meeting and Public Participation

By Andy Couch

The Statewide Alaska Board of Fisheries (BOF) Meeting at the Egan Conventions Center in Anchorage, Alaska from 8:30 a.m. Tuesday March 17 - until BOF work is concluded possibly late in the day on Saturday March 21, is currently the board's last scheduled regulatory meeting for the 2025 / 2026 board cycle. As reported last week, along with several other proposals, the Board will be considering Proposal 186 which would amend fishery regulations found in the Central District Drift Gillnet Fishery Management Plan. The need to consider this proposal earlier than the normal Upper Cook Inlet meeting arises from ADF&G's failure to attain adequate coho salmon spawning escapement at Deshka River and Little Susitna River for the past three years.

According to 5 AAC 21.353 "(a) The purpose of this management plan is to ensure adequate escapement and a harvestable surplus of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District salmon and Kenai River coho salmon in order to provide all users with a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions. The department shall manage the Central District commercial drift gillnet fishery as described in this section."

The issue is that combined with the new Federal Cook Inlet EEZ drift gillnet fishery the regulations allowed under the State plan may be too liberal to allow enough coho salmon passage into Northern Cook Inlet to meet the Alaska Department of Fish and Game's sustainable escapement goals (SEGs) for coho salmon on Deshka River and Little Susitna River — even when Northern Cook Inlet commercial and sport users were restricted and then closed by inseason emergency regulation during each of past three seasons.

**Board Meeting Participation** While the pre-meeting opportunity to provide public comment expired after March 2, 2026 — multiple individuals have contacted me mentioning a willingness to participate in the public process, but having failed to provide public comment (PC) before the deadline. Multiple options remain for public participation, starting with the opening of the meeting at 8:30 a.m. on Tuesday March 17, 2026 individuals, public officials, groups or organizations may provide the board with record copies (RCs). Record copies are simply written input that may be provided by the public during the meeting — up until the time the BOF deliberates on a specific proposal. Even four to ten sentences documenting past fishery escapements, yield levels, usage by specific user groups, or personal information about Northern Cook Inlet coho salmon stocks may be important to specific board of fisheries members in determining what could be appropriate BOF actions to address Proposal 186 and the Central District Drift Gillnet Fishery Management Plan in sufficient manner to achieve the purpose of the plan in providing adequate escapements of Northern Cook Inlet coho stocks while also providing all user groups a reasonable harvest opportunity throughout entire fishing seasons. After the meeting starts the public should be able to submit a RC online at the Statewide Board of Fisheries Meeting Information page: <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=03-17-2026&meeting=anchorage>

Record copy information can also be submitted in person to the ADF&G Board Support table at the Statewide Board of Fisheries meeting. In addition, individuals, fish and game advisory committees, and other groups may sign up to provide public testimony at the meeting until 10 a.m. on Wednesday March 18, 2026. There will be opportunity to provide additional new information during what is called "Committee of the Whole." Committee of the Whole for Proposal 186 and other group one proposals is tentatively scheduled to start at Thursday March 19 at 8:30 a.m. Record copies may continue to be submitted until the board starts deliberating on specific proposals that the record copies address. Board deliberation on group one proposals is tentatively scheduled to start at 8:30 a.m. on Friday March 20, 2026.

I appreciate the efforts of all individuals, public officials, groups and organizations in supporting this effort to provide better regulation of the Upper Cook Inlet fishery so that Northern Cook Inlet salmon and specifically coho salmon SEGs may be attained on a more consistent basis. I intend to continue reporting on this issue and the Board's decision that should be in regulation during the 2026 fishing season.

Andy Couch is a member of the Matanuska - Susitna Borough Fish and Wildlife Commission and the Matanuska Valley Fish and Game Advisory Committee the thoughts and opinions expressed in this column are his own - unless noted otherwise.

Andy Couch

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# **Mat Su Public Testimony Outline Alaska Board of Fisheries March 17-21, 2026 Statewide Finfish and Supplemental Issues**

## **I. Schedule for Public Testimony**

### **Tuesday March 17, 2026 (afternoon) and March 18, 2026 (morning)**

PUBLIC TESTIMONY: Oral Public Testimony, including Advisory Committee Reports

- Testimony is expected to be limited to **three (3) minutes for individuals** and groups and ten (10) minutes for advisory committee representatives and regional advisory council representatives.
  - Sign up for designated time slots closes at 10:00 am Wednesday March 18. The Mat Su team will be signed up by Mac Minard as a block to provide an orderly flow of information. We should anticipate going Tuesday afternoon.
  - Public testimony will continue until those who are present at the meeting are heard; the board will continue working through its agenda immediately upon conclusion of public testimony.
  - We need to be thoughtful on what we present during Public Testimony and what is held for discussions in the Committee of the Whole. It is generally more effective to provide detailed information during the Committee work.

### **Wednesday, March 18, 2026 8:30 a.m.**

- Continue public testimony until complete

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## **II. Topics For Public Testimony**

Proposal 186 is a conservation based regulatory action based on: 1) Northern Cook Inlet coho numbers have declined with increased use of central district drift gillnet fishery to harvest large runs of Kenai and Kasilof sockeye in recent years;

2) Coho escapement goals are not being achieved despite significant sport fishery restrictions and closures in area rivers; and

3) Management of the drift gillnet fishery has also been complicated by creation of the EEZ requiring Federal management of a portion of Cook Inlet waters beginning in 2024.

To address these conservation concerns we have established three goals for revising the Central District Drift Gillnet Fishery Management Plan:

1. ensure effective conservation of Northern Cook Inlet coho and sockeye salmon,

2. address unforeseen effects of record large sockeye runs in combination with Federal management of a portion of the fishery which, historically, was solely managed by the State of Alaska, and
3. fully implement the conservation corridor for north-bound stocks.

*Note: Staff comments on Proposal 186 report that increased drift gillnet fishing opportunity in years with large Kenai and Kasilof River sockeye runs exacerbates coho salmon conservation efforts and that the department supports adoption of regulations that improve coho salmon conservation.*

Proposal 186 is the single proposal that the Mat Su Fish and Wildlife Commission is focused on at the Statewide Board of Fisheries Meeting and it opens the door to conservation-based revisions to the entire Central District Drift Management Plan. This document is intended to assist those testifying on behalf of the Commission to focus their comments and use a common terminology and message discipline – remember you only have three minutes.

A. List of topics and presenters for Public Testimony.

The Commission has been highly effective in presenting relevant information when we coordinate a flow of testimony based on key topics. Table 1. aligns Mat Su Commission members and staff with relevant topics intended to build the record during the Public Testimony phase of the meeting and lead to a positive meeting outcome.

Table 1. Order by person and topic for public testimony on behalf of the Mat/Su Fish and Wildlife Commission.

ORDER	WHO	WHAT	Related Goal(s)
1	Paul Clark	Introduce the Mat-Su Borough Fish & Wildlife Commission, Topics	All
2	Andy Couch	Northern District sockeye and coho conservation concerns.	1
3	Pete Probasco	History and Efficacy of the Conservation Corridor	3
4	Gabe Kitter	Federal Fisheries Management	2
5	??	Mixed Stock Fishery Complexity	1,2,3
6	Mac Minard	Wrap Up/ Takeaways	All

DRAFT TESTIMONY Follows. Once refined and edited we will offer these comments both orally during Public Testimony and in written form as ACRs so they become part of the written record. I am available to assist presenters with refining their comments. The following is intended to get that effort rolling.

Paul Clark  
Long Range Planner  
Matanuska Susitna Borough  
Public Testimony  
2026 Statewide Finfish and Supplemental Issues Board of Fisheries Meeting

**I. Introduce the Mat Su Borough Fish and Wildlife Commission, and Topics – Paul Clark**

My name is Paul Clark. I am a long-range planner for the Matanuska-Susitna Borough and staff the Borough's Fish & Wildlife Commission. The FWC is a 9-member board advising Borough officials, state or federal agencies, and other organizations on interests that may affect the conservation and allocation of fish, wildlife, and habitat across an area the size of West Virginia. The region contains four indigenous communities: Chickaloon, Knik, Eklutna, and Tyonek, and includes commercial, personal use dip net, sport fish, and subsistence users.

I would like to introduce the members of the Mat/Su Fish and Wildlife Commission who will be speaking to you today on behalf of the Mat Su Borough.

Andy Couch, Vice Chairman of the FWC will address Northern District sockeye and coho conservation concerns.

- Mr. Couch has been a professional salmon guide for over 40 years, has served on Matanuska Valley AC for 30 years, and has years of experience in the Board of Fish Regulatory Arena.
- Andy has also written a fishing column for the Frontiersman newspaper for 14 years.

Pete Probasco, Chairman of the FWC, will address the complexity of Mixed-stock fisheries and the History and Efficacy of the Conservation Corridor.

- Mr. Probasco served with ADF&G for 23 years and retired as the Commercial Fish Division Regional Supervisor in Kodiak.
- He also spent 17 years with the Federal Subsistence program, migratory birds, and state programs.

Gabe Kitter will address Federal Fisheries Management and the EEZ

- Mr. Kitter is a lifelong Mat-Su resident and local hunting guide and serves on the Mat/Su Fish and Wildlife Commission for X years.

Mac Minard will close our presentation by highlighting the challenges ahead of us at this meeting.

- Mr. Minard served with ADF&G for 22 years and during that time led the commercial fish research efforts in western Bristol Bay, served as the Bristol Bay Area Sport Fish Biologist and retired as the AYK Regional Supervisor.
- Mr. Minard has extensive experience in complex fisheries management issues and the Alaskan regulatory process.
- Mr. Minard currently is on contract with the Mat Su Borough as a Fisheries Consultant

Andy Couch  
Vice Chairman, Mat-Su Fish and Wildlife Commission  
Matanuska Susitna Borough  
Public Testimony  
Statewide Finfish and Supplemental Issues Board of Fisheries Meeting, 2026

**II. Northern District Sockeye and Coho Salmon Conservation Concerns. – Andy Couch**

1. Northern Cook Inlet coho numbers have declined with increased use of central district drift gillnet fishery to harvest large runs of Kenai and Kasilof sockeye in recent years.
2. Coho escapement goals are not being achieved despite significant sport fishery restrictions and closures in area rivers.
3. Historically, the larger the pre-season projections of Kenai sockeye by ADF&G, the fewer Susitna coho and sockeye successfully made it north to their natal streams to spawn. This can be traced to indiscriminate mixed stock drift gillnet harvests and a lack of regulatory application of the Sustainable Fisheries and Mixed Stock Fisheries Policies.
4. The Sustainable Salmon Fisheries Policy directs that wild salmon stocks be managed to allow escapements in ranges necessary to conserve and sustain production that assures sustained yield.
  - The current drift gillnet fishery management plan does not pass coho salmon northward in sufficient numbers to consistently meet established escapement goals.
  - Chronic escapements below or near the lower escapement goal do not sustain significant yields.
5. The Mixed Stock Fisheries policy directs that the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern.
  - The commercial drift gillnet fishery harvests a mixture of salmon species and stocks returning to rivers throughout Cook Inlet.
  - The Central District Drift Gillnet Fishery Management Plan directs that the Department shall manage the 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.
  - However, the drift gillnet fishery has continued and even increased harvest of significant numbers of coho under the current management plan.

- The conservation burden for northern inlet coho is currently borne entirely by the terminal fisheries with no corresponding contribution by the central district drift gillnet fishery.
  - Future productivity patterns of Cook Inlet coho, sockeye and Chinook stocks are all highly uncertain.
  - It is unclear whether recent low Coho returns will be a long-term pattern or temporary condition.
  - It is unclear when Kenai Chinook will recover to the point where the commercial set gillnet fishery can resume significant harvest of UCI sockeye.
  - It is unclear how the federal fishery will impact salmon returns to state waters and escapement in the absence of effective in season management of the EEZ.
  - It is also unclear how the drift fleet will adapt future fishing patterns to the new Federal/State management structure.
6. Adoption of the 1% rule was intended to define the “end” of the Kenai and Kasilof sockeye run and provide an orderly transition to coho salmon management. While a sound strategy, defining the “end” of the run with such a low threshold does little to address the conservation concerns present for coho salmon today. This threshold needs to be increased.

Pete Probasco  
Chairman, Fish and Wildlife Commission  
Matanuska Susitna Borough  
Public Testimony  
Statewide Finfish and Supplemental Issues Board of Fisheries Meeting, 2026

### NEEDS UPDATED CATCH DATA

#### III. History and Efficacy of the Conservation Corridor – Pete Probasco

For decades, commercial fisheries management of Kenai River sockeye has impacted Upper Cook Inlet with little regard for appropriate harvest levels of Northern District fish stocks and degraded them to alarming levels resulting in poor escapements and local fishing opportunities being restricted or eliminated.

- 1) Conservation Corridor was established in 2011, Northern District salmon were almost universally in decline and the benefits were realized immediately.
- Limits on drift gillnet fishing in the central inlet (Area 2) by restricting commercial fishing to the Expanded Harvest Corridor provides a conservation corridor (the remainder of Drift Area 2) for north-bound salmon stocks.
  - The corridor has proven particularly effective in passing Susitna sockeye which now consistently meet escapement goals.
  - Fishing in the Expanded corridor and maintaining the Conservation Corridor in the remainder of Drift Area 2 significantly reduced the catch contribution of northern inlet sockeye relative to non-corridor openers in 2025 based on Genetic Stock Identification (GSI).
  - Expanded Kenai and Kasilof sections effectively harvest large numbers of sockeye contrary to objections when first adopted.
  - Expanded sections accounted for almost 60% of the 3.5 million sockeyes harvested by the drift fishery in 2025 from the largest UCI sockeye run on record.
  - The greatest success in conserving Northern bound salmon stocks has been establishing and maintaining the Conservation Corridor. The Corridor has successfully pulsed more fish through the commercial drift fleet and into northern waters, allowing Northern salmon to return to their natal streams to spawn.

Not sure if we should update and include the following or hold until Committee of the Whole

1. From 2014-2019, drifters harvested an average delivery of 53 coho per delivery in the Conservation Corridor, versus 10 coho per delivery in the Harvest Zone, during the critical period from July 16-31.
  2. Restricting the drift gillnet fishery to terminal harvest zones will reduce Northern District coho bycatch **fivefold** on average.
  3. Susitna sockeye was designated a stock of concern in 2008; 12 years later, in 2020, as a result of regulatory changes enforcing the Conservation Corridor, they were delisted.
  4. Coho returns in Northern Cook Inlet streams reached record lows in 2011- 2012. Regulations supporting the Conservation Corridor showed immediate improvements. Commercial Drift gillnet catch data demonstrates the impacts commercial fishing locations can have on northern-bound coho.
  5. Expanded Kenai and Kasilof sections focus harvest in more terminal areas where Kenai and Kasilof sockeye are abundant. These sections significantly reduced the catch contribution of northern inlet sockeye relative to non-corridor openers in 2025 based on Genetic Stock Identification (GSI).
  6. The Drift Gillnet fleet can be effective in the terminal harvest areas
  7. Expanded Kenai and Kasilof sections effectively harvest large numbers of sockeye contrary to objections when first adopted. Expanded sections accounted for almost 60% of the 3.5 million sockeye salmon harvested by the drift fishery in 2025 from the largest UCI sockeye run on record.
  8. Since the conservation corridor (expanded terminal areas) was first utilized in 2011, drift gillnet fishery harvest in the terminal areas has averaged **391,062 sockeye per year which is 33%** of the drift total.
- Terminal area harvest of sockeye was a record ex-vessel value in 2025 estimated to be **\$xxxxx** millions

**2) Federal Fisheries Management – Gabe Kitter**

- i. Federal management in the EEZ could devastate Northern District salmon stocks. Conservative management must be implemented for the immediate future.
  1. Potential to double the commercial drift harvest in a mixed stock fishery – potentially placing weaker Northern District stocks at greater risk
  2. The Federal systems lack the ability to make timely in season management decisions – placing the burden of conservation within state managed waters.
  3. Proposed fishing schedules in the EEZ may result in significant catches and impacts to smaller, more vulnerable Northern District stocks. Therefore, the Board must apply the precautionary principle to commercial drift fishing in State managed waters.
  4. As a result of these concerns the FWC recommends the Board
    - ensure effective conservation of Northern Cook Inlet coho and sockeye salmon,
    - address unforeseen effects of record large sockeye runs in combination with Federal management of a portion of the fishery which, historically, was solely managed by the State of Alaska, and
    - fully implement the conservation corridor for north-bound stocks.

??????

Fish and Wildlife Commission

Matanuska Susitna Borough

Public Testimony

Statewide Finfish and Supplemental Issues Board of Fisheries Meeting, 2026

1) Mixed Stock Fishery Complexity - ?

- Every July, five different species of salmon, comprised of numerous stocks, swim through Upper Cook Inlet around the same time. Among the salmon are the Kenai sockeye, Kenai kings, Northern cohos, and Northern sockeye, all swimming in the same saltwater with commercial boats targeting Kenai and Kasilof sockeye.
- Farther upstream are the northern set gillnets. Still farther north are subsistence, personal use, and, finally, the inriver sport fishery.
- Historically, the larger the pre-season projections of Kenai sockeye by ADF&G, the fewer Susitna coho and sockeye successfully made it north to their natal streams to spawn. Large runs tend to trigger more liberal commercial fishing in the mixed-stock fishery of the Conservation Corridor.
- Northern District sockeye average 1.5 return per spawner and are less than Kenai River sockeye which average 4.5 fish per spawner and therefore need greater protection.
- By further refining mixed-stock locations and identifying and fishing individual systems, terminal stock management practices may be fine-tuned to balance the natural productivity within the system as a whole.
- Fishing the drift fleet primarily in the harvest zones, even on years of high sockeye projections, is a compromise and the type of conservative management effort that supports healthy, sustained populations of salmon in the Northern District and all of Upper Cook Inlet.

Given the variability of run timing year-to-year, and the current lack of inseason management tools in the Northern District, a conservative management approach and use of terminal stock management and the Conservation Corridor concepts are necessary to manage this complex fishery and maximize positive outcomes.

### **3) Wrap Up and Takeaways – Mac Minard**

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### **III. Committee Schedule**



# MATANUSKA-SUSITNA BOROUGH

## Planning and Land Use Department

### Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

[www.matsugov.us](http://www.matsugov.us)

To: Representative Kevin McCabe

From: Matanuska-Susitna Borough Fish and Wildlife Commission

Date: February 26, 2027

Re: HB 203 – an Act relating to the use of certain trawl or dredge fishing gear in state water (“Prohibit Bottom Trawling”)

Dear Representatives McCabe,

The Matanuska Susitna Borough Fish and Wildlife Commission provides this letter of support for Alaska House Bill 203 that would prohibit trawl and dredge fishing gear that make substantial contact with the seafloor. This would apply to bottom trawling, pelagic trawls that drop their nets to the bottom, and dredge fisheries. In bottom trawling, heavy metal doors keep the net mouth open and are dragged across the seafloor, essentially rototilling it, while the nets behind capture everything that is brought up. Pelagic trawls (above the seafloor) mimic bottom trawls when the doors towed in open water are dropped to the seafloor. Dredging employs a 10- to 15-foot-wide metal frame that tows heavy chain.

Trawl vessels target pollock, Pacific cod, rockfish, flatfish (flounder and sole), black cod, and Atka mackerel. There are also shrimp trawl fisheries in Southeast Alaska and Yakutat. The bycatch species of concern are salmon, Pacific halibut, and crab in groundfish and flatfish trawls; these also catch non-target rockfish, non-target black cod, and skates. Shrimp trawl bycatch includes rockfish and non-target shrimp species. Dredge vessels specifically target weathervane scallops. The main bycatch species are crab, flatfish, and some skates.

These fisheries damage benthic ecosystems, disrupt fish habitat, and catch and kill non-target “bycatch” species, including species that Alaska residents rely on in subsistence, sport, and commercial fisheries. Alaska’s seafood industry contributes \$33.3 million in ex-vessel earnings in the Mat-Su Borough and sportfishing contributes another \$31-\$64 million in local income.

The ability of marine life to rebound after damage to the seafloor may depend on whether fishing occurs on hard or soft bottom, the complexity of the ecosystem and habitat, and the frequency of gear contact. The ability of target species to be harvested sustainably depends on data-informed fisheries management. The types of and rates at which non-target bycatch species are caught come from federal and state fisheries observers. Observers are deployed on mid-water trawl and bottom trawl vessels in federal waters and those that move between federal and state waters. Observers are also deployed on scallop dredge vessels that operate between state and federal waters.

While there are many trawl vessels, over the last 20 years, only two to four vessels have participated in the scallop dredge fishery, moving between federal and state waters with about 22% of the harvest occurring in state waters. The limited number of vessels has limited both the bycatch and the ecosystem damage. There is also research that suggests soft-bottom habitats are able to recover from dredging relatively quickly, unlike hard-bottom seafloor communities. It is unlikely that there will be increased effort in this fishery. In 2013 the fishery was changed from limited entry to open access, yet there has been no increase in effort. This is likely due to the high cost of outfitting a vessel for this type of fishery and the steep learning curve required.

While we share concerns regarding damage to the benthic environment; the ability of benthic communities, target species, and bycatch species to recover from gear contact with the seafloor; and the impact on sport- and subsistence harvests, we are also concerned about the degree to which a ban on dredging could impact fishery management.

In March 2025, the Alaska Board of Fisheries considered Proposal 298, which would amend the State-Waters Weathervane Scallop Management plan to close state waters in the Yakutat, Prince William Sound, Kodiak, and Dutch Harbor areas to commercial scallop fishing using dredge gear and allow other experimental gear types, while removing the vessel monitoring system and onboard observer requirements. While ADFG was neutral on the allocative aspects, they opposed aspects that reduced their ability to assess fishing effort and harvest. An effect they considered was the potential for this to shift vessels entirely into federal waters and increase pressure in those areas. It could also affect the data being collected and potentially threaten the fishery itself. While the scallop fishery is co-managed by federal and state agencies, ADFG manages the observer program. Should state waters be closed to dredging, all weathervane scallop harvests would be stopped until a new Fishery Management Plan could be developed in which the federal government set up and managed an observer program on these vessels.

Given the current limited impact of the dredge fishery and the benefit of the data collected by observers, our recommendation would be to ban bottom trawling and pelagic trawls that contact the bottom, but to leave in place ADFG's management of the dredge fishery while research is conducted on impacts of gear contact with the seafloor in different areas and habitat types, and development of less destructive gear options.

HB203 recognizes the importance of research on the impacts of gear on fish habitat, ecosystems, and bycatch. The NOAA SAFE report and ADFG have outlined some of the most pressing scallop research needs. These include greater understanding of age-to and size-at maturity, stock assessments, environmental variables at specific scallop beds, and understanding where there are distinct populations, how they interact, and how that influences the ability of stocks to recover from harvest. Before-after control-impact (BACI) controlled fishing experiments could improve understanding of the ability for benthic communities to recover from dredging on soft-bottom habitats. These are just a few of the stock research studies that could be conducted. Additional studies could be conducted to evaluate the effects of area closures on reducing bycatch and to determine the feasibility of alternative harvest methods, including scallop farming, and on the ways in which biodiversity and health of Alaska's fisheries – including salmon, halibut, crab, and flatfish – are dependent on benthic habitat and resilient to habitat damage.



MSB Fish & Wildlife Commission Chair, Pete Probasco



# MATANUSKA-SUSITNA BOROUGH

## Planning and Land Use Department

### Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

[www.matsugov.us](http://www.matsugov.us)

To: Alaska Board of Fisheries

From: Matanuska-Susitna Borough Fish and Wildlife Commission

Date: February 26, 2026

Re: Comments on 2026 Statewide Finfish and Supplemental Issues

## I. Preamble

The following comments are submitted on behalf of the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC). The MSB FWC represents the interests of the Borough in the conservation and allocation of fish, wildlife and habitat. Specifically, the FWC advises borough officials, state or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area the size of West Virginia. Within this area, residents fish commercially, personal use dip net, sport fish, and four indigenous communities — Chickaloon, Knik, Eklutna Village, and Tyonek – engage in subsistence, educational, and personal use fisheries. The members of the FWC bring decades of experience managing fish and wildlife resources within Alaska.

Positions and actions of the MSB FWC related to fisheries conservation and management are informed by six (6) clearly stated goals:

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

### MSB Fish and Wildlife Commission Proposal Positions

For the 2026 Statewide meeting of the Alaska Board of Fisheries, the FWC is focused solely on reviewing and developing a position for proposal 186, which was accepted as an Agenda Change Request (ACR) consistent with guidelines set forth in 5 AAC 39.999, to address a “fishery conservation purpose or reason”. The FWC is pleased that the Board, through its actions in accepting the ACR, recognizes the magnitude and urgency of the issues that Proposal 186 seeks to address.

## **II. Matanuska-Susitna Borough Fish and Wildlife Commission Comments on Statewide Finfish and Supplemental Proposals**

### **Proposal 186 5 AAC 21.353**

#### **Central District Drift Gillnet Fishery Management Plan.**

**SUPPORT**

What problem does Proposal 186 address?

With the inception of the more liberal Federally managed EEZ drift gillnet fishery, and Kenai king salmon conservation changes, the State of Alaska seeks to harvest a greater portion of surplus Kasilof and Kenai River sockeye salmon offshore in the drift gillnet fishery. This strategy is inconsistent with terminal stock fisheries management and has resulted in increasing incidental catches of Northern bound coho salmon, negatively affecting spawning escapements, and reasonable harvest opportunities for subsistence, commercial, sport, and personal use needs in Northern Cook Inlet.

Inriver salmon shortages have resulted in consistent restrictions and closures for Northern District commercial and sport fisheries over the past three years. Sport fishery closures were focused most specifically on the Deshka River and Little Susitna River during this time. In spite of intense inriver restrictions, too few salmon were left to even remotely achieve published Department coho salmon SEGs in either river. Adaptive Management Changes need to be considered and made. A more precautionary management approach as outlined in 5 AAC 39.222 is clearly required.

What does Proposal 186 do?

Proposal 186 seeks to limit incidental catches of coho salmon by effectively reducing the fishing area starting July 9 by limiting commercial fishing to the Expanded Kenai section (Statistical Area 244-52) and Expanded Kasilof Section (Statistical Area 244-62) and Anchor Point Section (Statistical Area 244-63) with removal of additional fishing time outside these sections regardless of sockeye run strength.

Specifically, Proposal 186 does the following:

- 1) from July 9 – July 15 at run strengths greater than 2.3 million Kenai River sockeye, Drift Gillnet Area 1 is removed from the current regulation
- 2) from July 16 – July 31 at run strengths of greater than 2.3 million Kenai sockeye
  - a. removes reference to one regular 12 hr. period
  - b. removes Drift Gillnet Area 1
- 3) Removes reference to remaining weekly 12-hour regular fishing periods that took place in the Expanded Kenai, Kasilof and Anchor Point Sections.
- 4) At run sizes projected to be over 4.6 million, it restricts the district-wide period to the harvest corridor.

## Discussion and Rationale

The history of commercial fisheries management priorities in Upper Cook Inlet has been one of placing the harvest of surplus sockeye salmon, particularly those stocks bound for Kenai and Kasilof Rivers, ahead of conservation concerns for weaker Northern bound coho and chinook salmon stocks. Additionally, Upper Cook Inlet has historically been managed as a mixed stock commercial fishery which further impacts the weaker Northern bound stocks.

In more recent Board of Fisheries actions, the board has moved incrementally toward regulations favoring Terminal Stock Fisheries management as is employed in Bristol Bay. This was first evidenced in the Board's recognition of the value of a "Conservation Corridor" to pass Northern bound stocks by limiting more commercial drift gillnet fishing to what is now referred to as the Expanded Kenai, Expanded Kasilof and Expanded Anchor Point sections. This enlightened approach had the potential to favorably address stock conservation issues in the Northern District and allow the harvest of surplus sockeye until the creation of the Federally managed EEZ.

The creation and management of the EEZ creates an incredible amount of uncertainty for the Alaska Department of Fish and Game and the Board of Fisheries. In the face of uncertainty, the Board routinely has applied a precautionary principle to managing salmon harvest in favor of meeting escapement and inriver targets. Proposal 186 calls for restrictions in the drift gillnet fishery to address the consistent failure of the current management system to meet escapement and inriver use needs of the Northern district, while still providing sufficient tools for the Department to effectively manage the important commercial fishery.

The Matanuska Susitna Borough Fish and Wildlife Commission strongly supports Proposal 186 and looks forward to working with the Board of Fisheries and other stakeholders to address the serious and chronic conservation concerns recognized by the Board in accepting Proposal 186 as an Agenda Change Request.



MSB Fish & Wildlife Commission Chair, Pete Probasco

# Upper Cook Inlet Management Area Central District Drift Gillnet Statistical Areas

244-50: Waters south of a line extending from Boulder Point to Shell Platform C, north of 60° 20.43' N, east of a line from Shell Platform C to Northwest Point, and west of the Expanded Kenai Section

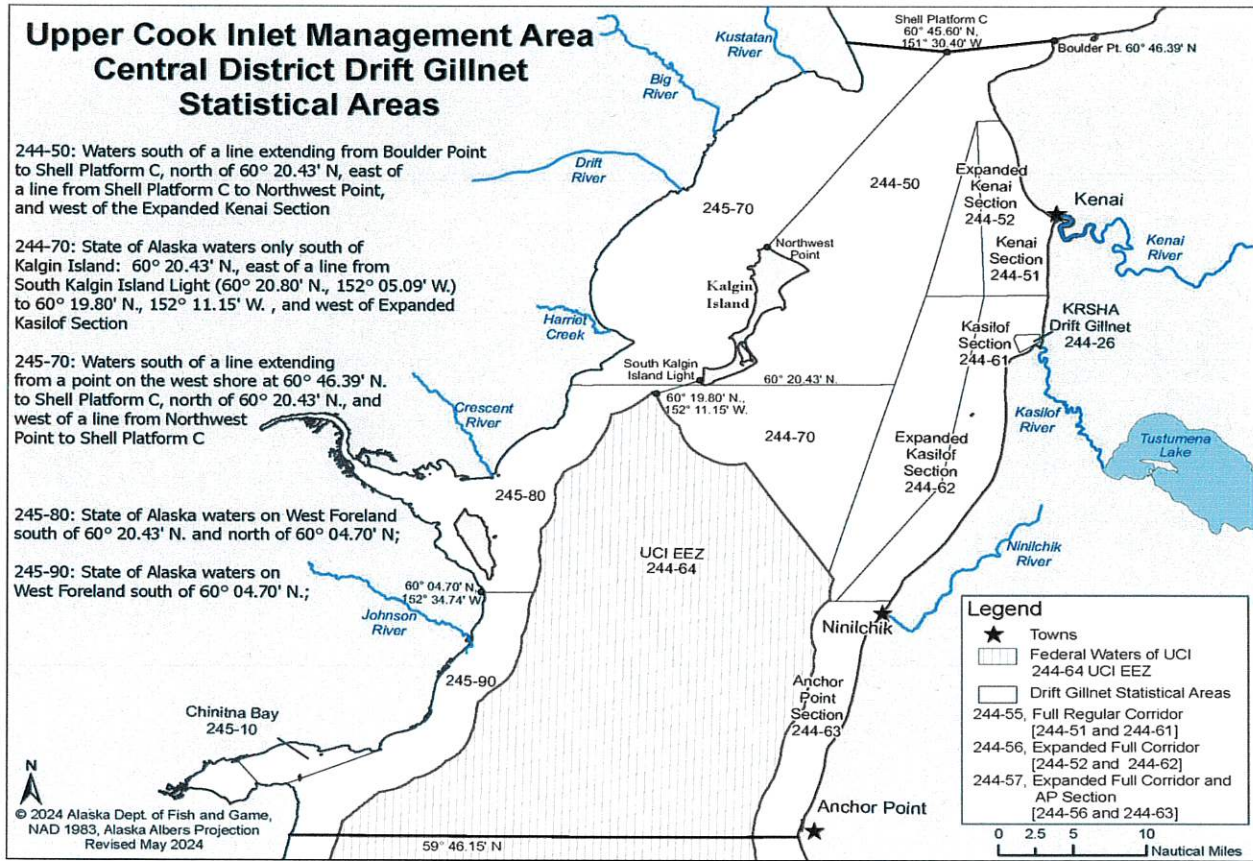
244-70: State of Alaska waters only south of Kalgin Island: 60° 20.43' N., east of a line from South Kalgin Island Light (60° 20.80' N., 152° 05.09' W.) to 60° 19.80' N., 152° 11.15' W., and west of Expanded Kasilof Section

245-70: Waters south of a line extending from a point on the west shore at 60° 46.39' N. to Shell Platform C, north of 60° 20.43' N., and west of a line from Northwest Point to Shell Platform C

245-80: State of Alaska waters on West Foreland south of 60° 20.43' N. and north of 60° 04.70' N.;

245-90: State of Alaska waters on West Foreland south of 60° 04.70' N.;

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# Upper Cook Inlet Management Area Central District Drift Gillnet Areas

## Drift Gillnet Areas 1 -4 (5 AAC 21.353 (g)(1)(2)(3)(4))

### Drift Gillnet Area 1:

State of Alaska waters only south of Kalgin Island: 60° 20.43' N.

### Drift Gillnet Area 2:

A: Southwest Corner: 60° 20.43' N, 151° 54.83' W.

B: Northwest Corner: 60° 41.08' N, 151° 39.00' W.

C: Northeast Corner: 60° 41.08' N, 151° 24.00' W.

D: Blanchard Line Corridor Boundary: 60° 27.10' N, 151° 25.70' W.

E: Southeast Corner: 60° 20.43' N, 151° 28.55' W.

Drift Gillnet Area 3: within 1 nmi of mean lower low water (zero tide) south of point on West Foreland: 60° 42.70' N, 151° 42.30' W.

### Drift Gillnet Area 4:

State of Alaska waters south of

A: 59° 04.70' N, 152° 34.74' W. to the latitude of

B: 59° 46.15' N, 153° 00.20' W. off the western shore of Cook Inlet

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