

State of Alaska

SARAH PALIN, Governor

Commercial Fisheries Entry Commission

8800 Glacier Hwy, #109

P.O. Box 110302

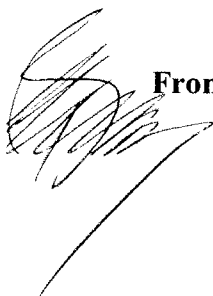
Juneau, AK 99811-0302

MEMORANDUM

To: Cook Inlet Salmon Task Force
Representative Craig Johnson, Chair
Senator Lyda Green, Vice-Chair
Representative Kyle Johansen
Representative Mark Neuman
Representative Bill Stoltze
Representative Mike Doogan
Senator Charlie Huggins
Senator Lesil McGuire
Senator Bill Wielechowski
Senator Tom Wagoner

Date: October 7, 2008

Phone: (907) 790-6944 VOICE
(907) 790-7044 FAX



From: Bruce Twomley, Commissioner
Commercial Fisheries Entry Commission

Subject: Report to the Cook Inlet Salmon Task Force on the Buy-Back Program under the Alaska Limited Entry Act

I. INTRODUCTION

The Cook Inlet Salmon Task Force requested Commissioner Bruce Twomley¹ of the Alaska Commercial Fisheries Entry Commission (CFEC or Commission) to report on the buy-back program authorized by the Alaska Limited Entry Act² and whether the program could serve the goals of the Cook Inlet Salmon Task Force.

As discussed in detail below, whether the voluntary buy-back program authorized by the Limited Entry Act would be helpful to the Cook Inlet Salmon Task Force would depend upon whether the goals

¹ Having been appointed to the commission by Governor Jay Hammond in 1982, Commissioner Twomley has reported on buy-back to the Alaska Legislature and to the Board of Fisheries a number of times. Additionally, Twomley is the principal author of the only optimum number decision upheld by the Alaska Supreme Court in *Simpson v. State, CFEC*, 101 P.3d 605 (Alaska 2004).

² AS 16.43.010--AS 16.43.990.

agreed upon by the Task Force are consistent with the three enumerated statutory purposes that authorize a buy-back program under the Limited Entry Act.³ To paraphrase the statutory standards, the Limited Entry Act requires a buy-back program to produce a well conserved, economically healthy fishery which includes a sufficient number of participants to protect the reliance interests of those dependent on the fishery. The statutory standards also suggest a long-term commitment to the well-being of the fishery and its participants.

The Limited Entry Act also authorizes a private opportunity to buy out limited entry permits. However, any form of reducing the number of entry permits in a commercial fishery raises a State Constitutional issue: if the fishery were to become too exclusive under the Alaska Constitution, the State would have an obligation to put more permits back into the fishery.

This report begins with a brief profile of two Cook Inlet commercial fisheries: the Cook Inlet salmon drift gillnet fishery and the Cook Inlet salmon set gillnet fishery. These fisheries show substantial Alaskan participation. More than 1,000 Alaska residents hold entry permits in one or the other.

Finally, this report examines the statutory authorization for a buy-back program under the Limited Entry Act as well as some constitutional and other issues that arise from implementation of a buy-back program.

II. PROFILES OF THE COOK INLET SALMON DRIFT GILLNET AND SET GILLNET FISHERIES

A. Cook Inlet Salmon Drift Gillnet Fishery

In the Cook Inlet salmon drift gillnet fishery, 571 permit holders are entitled to participate.⁴ During the 2007 fishing season, participants in the drift gillnet fishery grossed an estimated \$13.0 million.⁵

³ AS 16.43.290 [quoted in Section III. A. of this report].

⁴ Attachment A (presenting figures as of year-end 2007).

⁵ *Id.* (sometimes referred to as ex-vessel value).

Alaska residents hold 398 out of the 571 drift gillnet entry permits for this fishery.⁶ Alaska residents thus hold 70% of the Cook Inlet salmon drift gillnet entry permits.⁷ Additionally, a substantial number of permit holders (227) live in areas local to the fishery.⁸

For September of 2008, CFEC estimated the market value of a Cook Inlet salmon drift gillnet entry permit to be \$33,300.⁹ As of that date, a lower bound estimate of the combined value of all permits in the fishery would be \$19.0 million.¹⁰ Over the years, permit values have ranged from \$11,700 in 2002 to \$202,058 in 1990.

B. Cook Inlet Salmon Set Gillnet Fishery

In the Cook Inlet salmon set gillnet fishery, 738 entry permit holders are entitled to participate.¹¹ During the 2007 fishing season, participants grossed an estimated \$10.5 million.¹²

Alaska residents hold 608 of the 738 entry permits for this fishery. Alaska residents thus hold 82% of the Cook Inlet salmon set gillnet entry permits.¹³ Additionally, a substantial number of permit holders (257) live in areas local to the fishery.¹⁴

For September of 2008, CFEC estimated the market value of a Cook Inlet salmon set gillnet entry permit to be \$13,300.¹⁵ As of that date, a lower bound estimate of the combined value of all set gillnet entry permits in the fishery would be \$9.8 million.¹⁶ Over the years, permit values have ranged from \$8,000 in 2002 to \$98,514 in 1990.

⁶ *Id.* at 2.

⁷ *Id.*

⁸ *Id.* at 2. Additionally, an explanation and examples of areas considered local to the fishery are provided in Attachment C. http://www.cfec.state.ak.us/mnu_permit_values.htm.

¹⁰ Individuals who continue to hold their permits tend to value them at more than the market price. In addition considering the additional costs of vessels, gear, fuel and other expenses, the value of entry permits represents only a portion of the investment in an individual fishing operation.

¹¹ Attachment B (presenting figures as of year-end 2007).

¹² *Id.* (as of year-end 2007).

¹³ *Id.* at 2.

¹⁴ *Id.* Additionally, an explanation and examples of areas considered local to the fishery are provided in Attachment C.

¹⁵ http://www.cfec.state.ak.us/mnu_permit_values.htm

¹⁶ Individuals who continue to hold their permits tend to value them at more than the market price. In addition considering the additional costs of vessels, gear, fuel and other expenses, the value of entry permits represents only a portion of the investment in an individual fishing operation.

III. THE BUY-BACK PROGRAM UNDER THE ALASKA LIMITED ENTRY ACT

A. The Limited Entry Act

The function of a voluntary buy-back program under the Limited Entry Act is to reduce the number of limited entry permits in a commercial fishery to a number considered optimum for the fishery's long-term benefit.¹⁷

AS 16.43.290 authorizes the commission to undertake a voluntary buy-back program if the program would achieve "a reasonable balance" of the following three purposes reflected in the determination of:

- (1) the number of entry permits sufficient to maintain an economically healthy fishery that will result in a reasonable average rate of economic return to the fishermen participating in that fishery, considering time fished and necessary investments in vessels and gear;
- (2) the number of entry permits necessary to harvest the allowable commercial take of the fishery resource during all years in an orderly, efficient manner, and consistent with sound fishery management techniques;
- (3) the number of entry permits sufficient to avoid serious economic hardship to those currently engaged in the fishery, considering other economic opportunities reasonably available to them.

In short, a buy-back program under the Limited Entry Act would be required to reduce permits down to numbers that served three goals: (1) an economically healthy fishery providing a reasonable average rate of economic return to the participants; (2) a well conserved fishery capable of capturing the allowable commercial harvest "during all years" in an orderly and efficient manner; and (3) a fishery with a sufficient number of permits to protect the reliance interests of those individuals dependent on the fishery and lacking reasonably available economic alternatives. The "during all years" language together with the opportunity to modify an optimum number in response to substantial changes of circumstance over time suggest a long-term commitment to the well-being of a fishery and its participants. A buy-back program demonstrated to serve these goals would come within the commission's statutory authority

¹⁷ AS 16.43.290--16.43.330.

B. Constitutional and Other Issues Arising from the Buy-Back Remedy

Those familiar with buy-back under the Limited Entry Act are cautious about this remedy, because (among other issues) it raises a serious constitutional issue. Reducing the number of permits in a limited fishery creates the risk the fishery could be found to be too exclusive under Article VIII, Section 15 of the Alaska Constitution.¹⁸ To remain constitutional, a limited fishery cannot exceed the constitutional authority for limited entry: namely, to serve conservation and to prevent economic distress among fishermen.¹⁹ Consequently, a limited entry program should impinge on the open-to-entry principles of the Constitution as little as possible.²⁰ In the event a fishery does become too exclusive, the commission is required to put more permits back into the fishery.²¹

The only means by which the commission can attempt to protect a buy-back program from unconstitutionality is to perform an optimum number study under AS 16.43.290 in order to determine the optimum number of permits for the fishery.²² The commission would require at least a year and one-half to complete optimum number studies of the Cook Inlet drift and set net fisheries. However, because of the constitutional nature of the issues entailed in an optimum number study, a court could always second-guess the commission and make an independent determination that a fishery had become too exclusive.²³ If a fishery were found to be too exclusive, the commission has the duty to create and sell more permits for the fishery.²⁴ The possibility of adding more permits back into a fishery creates an obvious risk for those who finance a buy-back program.

To finance a buy-back program, the commission is authorized to assess fishermen up to 7% of their gross earnings.²⁵ An investment, such as a state loan to be repaid over time from the assessment would be necessary for a program to have an initial impact making it practicable for remaining fishermen to tax themselves to pay off the cost. There is no statutory provision, however, for any initial

¹⁸ *Johns v. CFEC*, 758 P.2d 1256, 1265-1266 (Alaska 1988).

¹⁹ *Id.* at 1266.

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Simpson v. State, CFEC*, 101 P.3d 605, 609 (Alaska 2004).

²⁴ *Johns*, 758 P.2d at 1266; *Simpson*, 101 P.3d at 613-614; and AS 16.43.330.

²⁵ AS 16.43.310. However, actually imposing a tax on permit holders already suffering from economic pressure would be difficult unless a referendum of the affected fishermen supported the measure. By analogy, the legislature required a favorable vote by 2/3's of all permit holders before a salmon fishery association could institute an assessment for the purpose of fleet consolidation. AS 43.76.230.

investment in a buy-back program. Without a funding mechanism for a front-loaded purchase and retirement of permits, such a program may attract little support from the permit holders. A buy-back program under the Limited Entry Act would be entirely voluntary.²⁶

Additionally, the commission has never performed an optimum number study for a set net fishery, and doing so could be problematic. The commission's research staff warns of difficulties with data in a set net fishery, where landings attributable to a number of entry permits may be recorded under only a single permit.

Finally, regulatory intervention in the Cook Inlet drift and set net fisheries may hinder efforts to conduct a meaningful optimum number study. The *Vanek* case documents the fact that, from 1996 through 2002, the Alaska Board of Fisheries reduced fishing opportunities available to both the drift and set net fisheries.²⁷ However, well before the period of time addressed in the *Vanek* case, there was considerable pressure on the Board to restrict fishing in these two fisheries. In response, by 1990, the Entry Commission made the Cook Inlet drift and the Cook Inlet set net fisheries high priorities for completing adjudications of pending applications, in order to reduce participants to the maximum numbers as soon as practicable.

This kind of human, regulatory intervention in the Cook Inlet drift and set net fisheries may create an obstacle to a meaningful optimum number analysis. In determining optimum numbers, CFEC normally gathers all of the data and creates models in an attempt to anticipate the effects of known variables that respond to natural and market conditions. In previous optimum number studies, variables like price and availability of the resource generally change according to cycles within a range that can be determined, while the regulatory treatment remains fairly constant. In contrast, the regulatory treatment of these Cook Inlet fisheries presents a moving target of a different nature. Projecting the effects of this variable into the future would be very difficult and could undermine the utility of an optimum number study.²⁸

²⁶ AS 16.43.300(b).

²⁷ *Vanek v. Alaska Board of Fisheries*, AK Supreme Court No. S-12579, Opinion No. 6308 (Sept. 19, 2008) at pps. 2-4.

²⁸ Other buy-back related issues include the substantial cost of retiring unfished permits and the likelihood that unrestrained fishing power could dissipate favorable effects of buy-back over time.

C. A Private Alternative to the Formal Buy-Back Program

As discussed above, buy-back under the Limited Entry Act is a cumbersome and issue-laden remedy. The Limited Entry Act, however, also facilitates a much simpler opportunity to buy out limited entry permits. Under AS 16.43.150(i), any permit holder may relinquish his permit back to the state. Because fishermen have this power, anyone could pay a permit holder to relinquish the individual's entry permit. In fact, this is the statutory tool recently employed by the Southeast Revitalization Association to retire 35 permits from the Southeast salmon purse seine fishery--so far the only buy-back program undertaken in Alaska.

The simplicity of this private approach, however, does not eliminate the major constitutional issue. A private buy-back program would still run the risk of creating a fishery too exclusive under the state constitution, thereby requiring the state to put more permits back into the fishery.²⁹

IV. CONCLUSION

A buy-back program for permits in a limited fishery is authorized under the Limited Entry Act, but only if the statutory and constitutional purposes of limited entry would be served by the program. Roughly, the statutory purposes that must be served by a buy-back program are to produce a well conserved, economically healthy fishery with a sufficient number of participants to protect the reliance interests of those dependent on the fishery. The statutory purposes also suggest a long-term commitment to the well-being of the fishery and its participants.

A private opportunity for buying out limited entry permits is also authorized by the Limited Entry Act but subject to the same constitutional constraints. Under either scenario, the numbers of permits in a fishery could be reduced to a point where the fishery became too exclusive under the State Constitution requiring the state to put more permits back into the fishery.

If buy-back under the Limited Entry Act does not meet the needs of the Cook Inlet Salmon Task Force, or, if the Task Force agrees upon goals different from the enumerated purposes for buy-back authorized by the Limited Entry Act, new legislation may be required.

²⁹ *Johns* 758 P.2d at 1266.

State of Alaska
Commercial Fisheries Entry Commission
Permit Statistics for Alaska's Cook Inlet Drift Gillnet Limited Entry Salmon Fishery: 1998 - 2007

June 4, 2008

Fishery Description	Year	Permit Residency	Permits Issued	Permits Fished	Permits		Total Pounds Harvested	Estimated Gross Earnings	Permit Value
					Not Fished	% Not Fished			
S 03H Salmon, Drift Gillnet, Cook Inlet	2007	Resident	401	297	104	25.9	13,409,028	\$12,973,923	\$29,200
		Nonresident	170	120	50	29.4			
		Year Totals		571	417	154	27		
	2006	Resident	400	293	107	26.8	6,125,229	\$5,159,160	\$28,800
		Nonresident	170	103	67	39.4			
		Year Totals		570	396	174	30.5		
	2005	Resident	405	334	71	17.5	17,142,608	\$15,344,259	\$39,300
		Nonresident	166	137	29	17.5			
		Year Totals		571	471	100	17.5		
	2004	Resident	400	313	87	21.8	19,336,476	\$11,801,740	\$20,300
		Nonresident	171	127	44	25.7			
		Year Totals		571	440	131	22.9		
	2003	Resident	396	293	103	26	10,891,761	\$6,329,162	\$15,700
		Nonresident	176	125	51	29			
		Year Totals		572	418	154	26.9		
	2002	Resident	394	284	110	27.9	12,635,440	\$5,686,049	\$11,700
		Nonresident	178	125	53	29.8			
		Year Totals		572	409	163	28.5		
2001	Resident	395	323	72	18.2	6,255,845	\$3,711,269	\$22,300	
	Nonresident	179	144	35	19.6				
	Year Totals		574	467	107	18.6			
2000	Resident	391	347	44	11.3	6,414,163	\$4,438,593	\$32,300	
	Nonresident	186	166	20	10.8				
	Year Totals		577	513	64	11.1			
1999	Resident	391	336	55	14.1	10,395,737	\$12,134,809	\$25,200	
	Nonresident	185	151	34	18.4				
	Year Totals		576	487	89	15.5			
1998	Resident	395	361	34	8.6	5,406,367	\$4,303,378	\$42,000	
	Nonresident	186	167	19	10.2				
	Year Totals		581	528	53	9.1			

Notes:

- Data for 2007 are preliminary and may be incomplete.
- Data are considered confidential when fewer than four people participated in a fishery.
- Selected data fields are represented by "0" when no activity has occurred in a fishery (i.e., closure).
- Gross earnings are estimated using an average annual ex-vessel price per area, species and gear type.
- These data are aggregated by type of permit fished, and thus contain both targeted and incidentally landed species.
- Data includes only commercial catch landed on valid permits. Data associated with test fishing, illegal landings, derbies, hatchery cost recovery fishing, educational permits or unmatchable permits are excluded.
- Percentages of permits not fished are calculated within each resident category.

**Table 1a. Distribution of Cook Inlet Salmon Drift Gillnet Permit Holders by Resident Category:
Initial Issuance and Yearend 2007**

	Resident	Non-Resident	Total
Permits Initially Issued	386	187	573
Yearend 2007 Permits Held	398	173	571

**Table 1b. Geographic Distribution of Cook Inlet Salmon Drift Gillnet Permit Holders by Resident Category:
Initial Issuance and Yearend 2007**

	ARL	AUL	ARN	AUN	NR	Total
Permits Initially Issued	167	11	197	11	187	573
Yearend 2007 Permits Held	221	6	156	15	173	571

ARL: *Alaska* resident of a *Rural* community which is *Local* to the fishery for which the permit applies;
 ARN: *Alaska* resident of a *Rural* community which is *Nonlocal* to the fishery for which the permit applies;
 AUL: *Alaska* resident of an *Urban* community which is *Local* to the fishery for which the permit applies;
 AUN: *Alaska* resident of an *Urban* community which is *Nonlocal* to the fishery for which the permit applies;
 NR: *Nonresident* of Alaska;

State of Alaska
Commercial Fisheries Entry Commission
Permit Statistics for Alaska's Cook Inlet Set Gillnet Limited Entry Salmon Fishery: 1998 - 2007

June 4, 2008

Fishery Description	Year	Permit Residency	Permits Issued	Permits Fished	Permits		Total Pounds Harvested	Estimated Gross Earnings	Permit Value
					Not Fished	% Not Fished			
S 04H Salmon, Set Gillnet, Cook Inlet	2007	Resident	618	405	213	34.5	10,258,292	\$10,450,349	\$14,000
		Nonresident	120	78	42	35			
		Year Totals		738	483	255	34.6		
	2006	Resident	616	405	211	34.3	8,935,533	\$8,591,257	\$12,500
		Nonresident	122	77	45	36.9			
		Year Totals		738	482	256	34.7		
	2005	Resident	615	418	197	32	16,625,895	\$15,407,868	\$10,000
		Nonresident	122	81	41	33.6			
		Year Totals		737	499	238	32.3		
	2004	Resident	621	407	214	34.5	15,504,196	\$11,120,561	\$7,600
		Nonresident	118	74	44	37.3			
		Year Totals		739	481	258	34.9		
2003	Resident	618	408	210	34	12,119,220	\$8,086,607	\$8,600	
	Nonresident	124	64	60	48.4				
	Year Totals		742	472	270	36.4			
2002	Resident	620	425	195	31.5	10,987,787	\$5,547,596	\$8,000	
	Nonresident	123	71	52	42.3				
	Year Totals		743	496	247	33.2			
2001	Resident	623	421	202	32.4	6,608,371	\$4,081,429	\$10,600	
	Nonresident	121	84	37	30.6				
	Year Totals		744	505	239	32.1			
2000	Resident	622	446	176	28.3	5,490,871	\$4,319,800	\$12,200	
	Nonresident	123	87	36	29.3				
	Year Totals		745	533	212	28.5			
1999	Resident	618	465	153	24.8	7,809,505	\$9,993,704	\$13,200	
	Nonresident	127	91	36	28.3				
	Year Totals		745	556	189	25.4			
1998	Resident	620	469	151	24.4	5,670,497	\$4,351,636	\$20,600	
	Nonresident	125	90	35	28				
	Year Totals		745	559	186	25			

Notes:

Data for 2007 are preliminary and may be incomplete.

Data are considered confidential when fewer than four people participated in a fishery.

Selected data fields are represented by "0" when no activity has occurred in a fishery (i.e., closure).

Gross earnings are estimated using an average annual ex-vessel price per area, species and gear type.

These data are aggregated by type of permit fished, and thus contain both targeted and incidentally landed species.

Data includes only commercial catch landed on valid permits. Data associated with test fishing, illegal landings, derbies, hatchery cost recovery fishing, educational permits or unmatchable permits are excluded.

Percentages of permits not fished are calculated within each resident category.

**Table 2a. Distribution of Cook Inlet Salmon Set Gillnet Permit Holders by Resident Category:
Initial Issuance and Yearend 2007**

	Resident	Non-Resident	Total
Permits Initially Issued	690	56	746
Yearend 2007 Permits Held	608	130	738

**Table 2b. Geographic Distribution of Cook Inlet Salmon Set Gillnet Permit Holders by Resident Category:
Initial Issuance and Yearend 2007**

	ARL	AUL	ARN	AUN	NR	Total
Permits Initially Issued	202	16	446	26	56	746
Yearend 2007 Permits Held	243	14	349	2	130	738

ARL: *Alaska* resident of a *Rural* community which is *Local* to the fishery for which the permit applies;
 ARN: *Alaska* resident of a *Rural* community which is *Nonlocal* to the fishery for which the permit applies;
 AUL: *Alaska* resident of an *Urban* community which is *Local* to the fishery for which the permit applies;
 AUN: *Alaska* resident of an *Urban* community which is *Nonlocal* to the fishery for which the permit applies;
 NR: *Nonresident* of Alaska;

DECISION RULES USED TO DESIGNATE URBAN, RURAL, LOCAL, AND NONLOCAL

Urban and rural designations are based upon the most recent information from Census 2000. During this cycle, the Census Bureau significantly changed its method of classifying areas as rural or urban. In general, there are now more Alaska places designated as rural, and consequently more permits issued and held by rural residents.

Urban and Rural Classification

For Census 2000, the Census Bureau classifies as "urban" all territory, population, and housing units located within an urbanized area or an urban cluster. It delineates these boundaries to encompass densely settled territory, which consists of:

1. Core census block groups or blocks that have a population density of at least 1,000 people per square mile and
2. Surrounding census blocks that have an overall density of at least 500 people per square mile

The Census Bureau's classification of "rural" consists of all territory, population, and housing units located outside of urbanized areas or urban clusters. Geographic entities, such as census tracts, counties, metropolitan areas, and the territory outside metropolitan areas, often are "split" between urban and rural territory, and the population and housing units they contain often are partly classified as urban and partly classified as rural.

Local/Nonlocal

The local/nonlocal distinction is linked to Commercial Fisheries Entry Commission administrative areas that are based on regulatory boundaries of the fishery. Coastal communities as well as some inland communities are considered local to the Cook Inlet set gillnet and drift gillnet salmon fisheries.

The Cook Inlet local area includes all but the eastern edge of the Anchorage Borough. The line dividing the Cook Inlet and Prince William Sound ADF&G regulatory areas is extended inland directly north. That is, the line runs from Cape Fairfield at 148°50'W, north to 61°32'N (just north of Bodenbug Butte and south of Palmer) and then west to 150°30'W (to the community of Susitna) and thereafter follows, at a little distance inland, the western shore of Cook Inlet, ending at Cape Douglas.¹

Alaska cities considered local to the Cook Inlet set gillnet and drift gillnet salmon fisheries are listed in the following table:

¹ "Changes in the Distribution of Alaska's Commercial Fisheries Entry Permits, 1975-2007" CFEC Report Number 08-5N, Appendix A.

Alaska Cities Considered Local to the Cook Inlet Set and Drift Gillnet Salmon Fisheries

Census Area	City	Zip Code	City Population	Rural / Urban Indicator
Anchorage Municipality	Anchorage	99501- 99509, 99511 - 99524, 99599	260283	U
	Birchwood	99577	260283	U
	Bird Creek	99540	260283	U
	Chugiak	99567	260283	U
	Eagle River	99577	260283	U
	Eklutna	99577	260283	U
	Elmendorf AFB	99506	260283	U
	Fire Island	99506	260283	U
	Fire Lake	99577	260283	U
	Fort Richardson	99505	260283	U
	Girdwood	99587	260283	U
	Indian	99540	260283	U
	Kern	99510	260283	U
	Peters Creek	99577	260283	U
	Portage	99587	260283	U
	Potter	99510	260283	U
	Rainbow	99510	260283	U
	Spenard	99509	260283	U
	Kenai Peninsula Borough	Anchor Point	99556	1845
Bear Cove		99603		R
Bear Creek			1748	R
Beluga			32	R
Beluga River		99682		R
Chenik				R
Clam Gulch		99568	173	R
Cohoe		99669	1168	R
Cooper Landing		99572	369	R
Crown Point			75	R
Diamond Ridge			1802	R
English Bay		99603		R
Fox River			616	R
Fritz Creek		99603	1603	R
Funny River			636	R
Grouse Creek Group				R
Halibut Cove		99603	35	R
Happy Valley			489	R
Homer		99603	3946	R
Hope		99605	137	R
Jakolof Bay		99603		R
Kachemak		99603	431	R
Kalifonsky		99611		R
Kalifornsky			5846	R
Kasilof		99610	471	R
Kasitsna Bay		99603		R
Kenai		99611	6942	U
Kustatan			R	
Lowell Point		92	R	
Miller Landing		74	R	

Alaska Cities Considered Local to the Cook Inlet Set and Drift Gillnet Salmon Fisheries

Census Area	City	Zip Code	City Population	Rural / Urban Indicator
Kenai Peninsula Borough	Moose Pass	99631	206	R
	Nanwalek	99603	177	R
	Nikishka	99635		R
	Nikiski	99635	4327	R
	Nikolaevsk	99556	345	R
	Ninilchik	99639	772	R
	Port Graham	99603	171	R
	Portlock	99603		R
	Primrose		93	R
	Red Mountain	99663		R
	Ridgeway		1932	R
	Salamatof	99611	954	R
	Seldovia	99663	286	R
	Seldovia Village	99663	144	R
	Seward	99664	2830	R
	Soldotna	99669	3759	U
	Sterling	99672	4705	R
	Sunrise	99669	18	R
	Tyonek	99682	193	R
	Matanuska-Susitna Borough	Alexander		
Alexander Creek				R
Big Lake		99652	2635	R
Bodenburg Butte		99645		R
Butte			2561	R
Gateway			2952	R
Knik		99687		R
Knik River			582	R
Knik-Fairview			7049	R
Lakes			6706	U
Palmer		99645	4533	U
Point Mackenzie			111	R
Susitna			37	R
Wasilla		99654, 99687	5469	U