

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Aaron Woodrow.....	PC001
Adam Hackett	PC002
ADF&G.....	PC003
Alaire Hughey.....	PC004
Alan Otness	PC005
Alaska Longline Fishermen's Association.....	PC006
Alaska Native Inter-Tribal Association of Seiners	PC007
Alaska Trollers Association	PC008
Allen Pool	PC009
ANB/ANS	PC010
Ben Hinde.....	PC011
Benjamin Atwood	PC012
Bethany Goodrich	PC013
Bill Menish.....	PC014
Blake LaPerriere	PC015
Blossom Twitchell	PC016
BoLars Matson	PC017
Brad Sobjack.....	PC018
Brian Zwick	PC019
Bruce White	PC020
Cale LaDuke.....	PC021
Caven Pfeiffer.....	PC022
Chandler O'Connell	PC023
Charles Allen Pool	PC024
Charles Fogle.....	PC025
Charles Schroth	PC026
Charles Treinen	PC027
Charlie Piercy	PC028

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Chris Combs	PC029
Chris Guggenbickler	PC030
Christopher Thorgesen	PC031
Claire Sanchez	PC032
Clare Kelly.....	PC033
Connie LaPerriere.....	PC034
Curt Schlosser	PC035
Dale Bosworth.....	PC036
Dan Sharp.....	PC037
Daniel Martin	PC038
Darrell and Ryan Kapp	PC039
Darrell Kapp	PC040
Dave Gordon	PC041
David Benitz	PC042
David Klepser	PC043
David Landis	PC044
Deborah Lyons	PC045
Dennis Thacker.....	PC046
Dennis Thacker.....	PC047
Derek Thynes	PC048
Donald Klepser	PC049
Doug Riemer	PC050
Ed Young	PC051
Edith Williams	PC052
Elsa Sebastian.....	PC053
Eric and Sarah Jordan.....	PC054
Franklin James, Sr.....	PC055
Fred Fayette	PC056
Gary Adkison	PC057

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Gerald Hope	PC058
Greg Albrecht	PC059
Greg Dierick.....	PC060
Heather Sanborne	PC061
Hope Merritt	PC062
Jackie Timothy.....	PC063
James Carter Hughes	PC064
James Fischer	PC065
Jared Fisherman	PC066
Jean Arnold	PC067
Jeff Budd	PC068
Jeff Farvour	PC069
Jeff Wedekind	PC070
Jenn Lawlor	PC071
Jim Borbridge	PC072
Jim Conrad	PC073
Joe Daniels	PC074
Joe Lindholm	PC075
Joel Randrup	PC076
Joel Steenstra	PC077
John Clark.....	PC078
John Murray	PC079
John Peckham	PC080
John Ryan	PC081
John Ryan	PC082
Josh Wisniewski	PC083
Julianne Curry	PC084
Justin Peeler	PC085
Ken Davis.....	PC086

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Ken Larson.....	PC087
Ken Wilkinson et al	PC088
Kenneth Gross.....	PC089
Kenyatta Bradley.....	PC090
Kevin Burchfield / Juneau Charter Boat Association.....	PC091
Lakota Harden.....	PC092
Larry Demmert.....	PC093
Lee Gilpin	PC094
Lee House.....	PC095
Leland Frankman.....	PC096
Lewis Hiatt.....	PC097
Lexi Fish.....	PC098
Lisa Honer	PC099
Lisa Sadleir-Hart	PC100
Louise Brady.....	PC101
Maia Mares	PC102
Marian Allen.....	PC103
Marie Graham.....	PC104
Marta Martinsen.....	PC105
Martha Sharp	PC106
Matt Beer	PC107
Matt Donohoe.....	PC108
Matthew Jackson	PC109
Max Kritzer	PC110
Max Worhatch	PC111
Michael Thelander	PC112
Michelle Putz.....	PC113
Mike Fox.....	PC114
MJ Westall.....	PC115

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Monica Lord-Wolf	PC116
Nate LaPerriere	PC117
Nathan Bernhardt et al	PC118
Nicholas Martin.....	PC119
Nina Vizcarrondo.....	PC120
Nora Skeele	PC121
Northern Southeast Regional Aquaculture Association	PC122
Office of Subsistence Management.....	PC123
Pat Alexander	PC124
Patricia Lee Dick	PC125
Patrick Bookey	PC126
Paul Menish.....	PC127
Paul Reinsch	PC128
Peter Bradley.....	PC129
Peter Karras Jr	PC130
Peter Roddy.....	PC131
Petersburg Vessel Owners Association.....	PC132
Ray Landgraf.....	PC133
Richard Curran	PC134
Robert Andrews	PC135
Robert Thorstensen Jr/Alaska Seine Boat Owners Association.....	PC136
Rollin Young	PC137
Ronald Ott.....	PC138
Russell Thomas.....	PC139
Ryan Kapp	PC140
Ryan Littleton	PC141
Ryan Nichols.....	PC142
Sandra Nessett	PC143
Sawyer Smith	PC144

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Seth Charlton	PC145
Shaun Haseltine	PC146
Sitka Tribe of Alaska	PC147
Sonia Ibarra	PC148
Southeast Alaska Fishermen's Alliance	PC149
Southeast Alaska Guides Association	PC150
Southeast Alaska Seiners	PC151
Southeast Herring Conservation Alliance	PC152
Southern Southeast Regional Aquaculture Association	PC153
Spike Arnold	PC154
Stephen Hoffman	PC155
Steve Gass	PC156
Steve Lambert	PC157
Steve Merritt	PC158
Tad Fujioka	PC159
Territorial Sportsmen Inc.	PC160
Tom Meiners	PC161
Tom Prijatel	PC162
Tsiu River Coalition	PC163
Ty Vandergriff	PC164
United Southeast Alaska Gillnetters	PC165
Victoria Curran	PC166
William Davidson & Dan O'Neal	PC167
William Vollendorf	PC168
Zach LaPerriere	PC169
Charlie Piercy (info submitted with proposal 172)	PC170
Don Westlund and Larry McQuarrie (info submitted with proposal 148)	PC171
Don Westlund and Larry McQuarrie (info submitted with proposal 115)	PC172

On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

Northern Southeast Regional Aquaculture Association Troll Representatives (info submitted with proposal 174)	PC173
Southern Southeast Regional Aquaculture Association (info submitted with proposal 151)	PC174
Tad Fujioka (info submitted with proposal 127).....	PC175



Submitted By
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Submitted On
11/28/2017 11:08:25 AM
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Alaska Resident

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Aaron Woodrow, Proposal 76, personal use/sport shrimp pot minimum mesh size restriction

I am the author of proposal 76 for establishing a minimum mesh size for shrimp pots in Southeast Alaska. The proposal was supposed to include language to cover personal use shrimp pots as well as sport shrimp pots. The proposal should include the term " and personal use" in conjunction with the term "sport" any where it is used. It should be noted that all commercial shrimp pots already have a minimum mesh size regulation in place.

The proposal should read as follows with the amendment highlighted in capital letters:

PROPOSAL 76

5 AAC 47.035. Methods, means and general provisions – Shellfish.

Establish mesh size requirements for Southeast Alaska sport AND PERSONAL USE shrimp pots, as follows:

I recommend the board impose a minimum mesh size for sport AND PERSONAL USE shrimp pots in Southeast Alaska, both netted and rigid, equal to the sport fish regulations already in place describing legal gear of shrimp pots in southcentral Alaska as follows. This is a direct copy and paste from southcentral sportfish shellfish regulations. Under this regulation, rigid sport shrimp pots must have a mesh opening of 7/8 inch square inside measurement.

Shrimp pot requirement:

- Two vertical sides of all shrimp pots must be made entirely of webbing big enough to allow a 7/8-inch round wooden dowel to go through without stretching or otherwise deforming the opening.
- The two vertical sides must touch each other and cannot be covered by anything.
- The other two sides, top, bottom, and tunnels may be composed of any material.
- The 7/8-inch size allows undersize and juvenile shrimp to escape.

A shrimp pot with no definable sides, such as a round pot, must have 50% of its vertical surface area covered with 7/8-inch webbing. The other 50% of its vertical sides, as well as its top and bottom, may be composed of any material.

What is the issue you would like the board to address and why? There are no restrictions in place regarding mesh size of shrimp pots for sport AND PERSONAL USE fishing in southeast Alaska to allow juvenile shrimp to escape.

Due to a trend in declining shrimp stocks and closures of several areas in southeast Alaska to sport AND PERSONAL USE and commercial use, it would seem to be a logical and responsible action to impose a minimum mesh size on sport AND PERSONAL USE shrimp pots to allow the escapement of juvenile shrimp. With no mesh restrictions in place, extremely young shrimp are harvested without a method for them to escape, facilitating the decline of this resource.



Submitted By
Adam Hackett
Submitted On
12/28/2017 1:19:17 PM
Affiliation
Hackett, Adam

In an effort to maintain access to salmon by trollers, especially in these times of low king salmon abundance, I urge Board of Fish to approve the following Proposals:

146,173,174,177,180,183

In regards to Unuk River and Chilkat and King Salmon River King Salmon action plans; An effort towards conservation by all user groups is essential to real conservation. In order to allow for intended conservation efforts decisions must be based on good scientific data with cooperation and collaboration from all user groups.

Thank you for your efforts and for considering my comments

Adam Hackett

Submitted By
Adam Hackett
Submitted On
12/28/2017 2:37:32 PM
Affiliation
Hackett, Adam

As a concerned citizen and sport, subsistence and commercial user, I would like to see the amount of Herring harvested in Sitka Sound Sac Roe fishery decreased as a preventative measure. We have seen Subsistence harvesters displaced from this resource. We have also seen Halibut and Salmon stocks suffering, further undermining their survival potential by overharvesting the base of our ecosystem is irresponsible and unethical. Especially with current market conditions for Herring sac roe, this equates to wanton waste in my mind, with many many people, species and generations adversely affected.

I strongly support the amended version of Proposal 99 while opposing proposal 104 and 94 to encourage both conservation and responsible use of this resource.

thanks for considering my comments

Adam Hackett



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER



PC003
2 of 8

Department of

ALASKA BOARD OF FISHERIES

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March 3, 2015

Bruce Twomley
Chairman, Alaska Commercial Fisheries Entry Commission
P.O. Box 110302,
Juneau, AK 99811-0302

Subject: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Chairman Twomley:

During the 2015 Southeast and Yakutat Finfish meeting in Sitka this past week, the Board of Fisheries considered Proposal 126, which would allow Sitka Sound herring seine permit holders to utilize open pounds to harvest roe on kelp in lieu of their customary sac-roe herring seine gear.

You may be aware the Sitka Sound herring fishery value has declined somewhat over the past few years with the market price falling below \$200/ton.

Also, the Sitka Tribe has encouraged the Board to reduce open fishing area and diminish harvest levels.

In considering Proposal 126, the Board was intrigued that the open pound fishery might provide a potentially higher price-point product to the market.

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the Southern Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open pound gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear for seine permits.

The Board was offered a variety of options by the Department of Law for action on Proposal 126 in light of the inability of the Board to pass the proposal as written, including passing the proposal contingent on eventual approval by CFEC. Not knowing whether or when CFEC might act, the Board found it difficult to craft appropriate language. The Board decided it was more appropriate for the proposer to approach CFEC for approval of this concept before the Board would take subsequent action and allow current seine permit holders the option of utilizing open pound alternative gear.



Accordingly, I am writing to inform you that the Board is open to further consideration of the proposal, and encourages the CFEC to assess the feasibility of acting to allow this fishery when approached by the proposer, Mr. Ryan Kapp.

You may already be aware of this concept as it has been before both the Board of Fisheries and CFEC over the years. We understand that CFEC may need a fair amount of time to make its determination.

Best Regards,

A handwritten signature in black ink, appearing to read "Tom Kluberton", followed by a horizontal line extending to the right.

Tom Kluberton, Chairman
Alaska Board of Fisheries

Attached: Proposal 126

CC: The Honorable Sam Cotten, Commissioner ADF&G



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302
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May 13, 2015

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

Re: Board of Fisheries Action on Southeast and Yakutat Finfish
Meeting Proposal 126

Dear Chairman Kluberton:

I am sorry for the time that this response to your March 3, 2015 letter has taken. CFEC and I have had much more than the usual interruptions during the intervening period.

You called our attention to Board Proposal 126, which appears to be intended to authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery.

An issue arising from the proposal is that CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted.

Your letter suggested the following approach:

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

* * *



A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the [Northern] Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear of seine permits.

I dithered over this a little bit, because I am accustomed to the Board first making a methods and means decision conditioned on subsequent independent regulatory action by the commission. However, there is at least a *prima facie* case for CFEC making a regulatory proposal that would modify its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area within Board's definition of the Sitka Sound roe herring purse seine fishery. Because our administrative area definition includes another limited fishery subject to Board regulation, there is an argument that we have not fully met our statutory duties under the Limited Entry Act AS 16.43.200, which reads in relevant parts as follow:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

* * *

The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

We will develop and publish a regulatory proposal for public comment. Of course, we will have to reserve judgment, until we have heard all the public testimony, as to whether the proposal is or is not consistent with the purposes of the Limited Entry Act. I can think of



competing analyses, and I am not sure about where this proposal will end up. But we can ensure that all sides are heard and fairly considered.

By Direction of the
COMMERCIAL FISHERIES ENTRY COMMISSION

A handwritten signature in black ink, appearing to read "Benjamin Brown".

Benjamin Brown, Commissioner
Bruce Twomley, Chairman

cc: The Honorable Sam Cotten
Commissioner, ADF&G



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

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January 8, 2016

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

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As I indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

After due consideration, the Commission has decided to take no further action on the proposal, as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.

When the Entry Commission considered a petition to limit the pound fisheries in Southeast Alaska in 1994, ADF&G Commissioner Carl Rosier sent us a memorandum regarding the Department's management and conservation concerns with the fisheries in the Hoonah Sound and Craig/Klawock areas. The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two



smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you and have any questions regarding this matter.

Yours Truly,
Commercial Fisheries Entry Commission

A handwritten signature in black ink, appearing to read "Bruce Twomley".

Bruce Twomley, Chairman
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)
Sitka Tribe of Alaska
Southeast Alaska Seiners Association



Submitted By
Alaire Hughey
Submitted On
12/28/2017 11:17:09 PM
Affiliation
Ms.

Phone
9077389252
Email
hughey.alaire@gmail.com
Address
220 Lakeview Dr.
Sitka, Alaska 99835

I am writing in opposition Proposal 94 and Proposal 104 and support of STA proposals 99, 105, and 106. I am a non-Native person and I was born and raised in Sitka. I started working in hatcheries when I was 14 years old and have gone on to work as a tech on multiple fisheries research and monitoring projects. I have also assisted in conducting ethnographic research on fisheries policy in Southeast Alaska, focusing primarily on the Sitka Sound herring fishery. What I have learned from my experience is that the state has tended to underestimate and disclude the vast knowledge of Lingit people generally, and STA specifically.

Lingit people have lived sustainably on this land for thousands of years and have passed down that knowledge through culture and oral history. While ADFG uses a 50-odd year baseline for data analysis, STA uses data from oral history that is thousands of years old. There are elders among us who have been alive longer than ADFG's baseline and say that they remember much higher populations of herring. This knowledge should be trusted!

I suspect that this disregard for Native knowledge and culture is related to the very recent colonization and continued racism that has shaped resource management policy in Alaska and the U.S. more broadly. To ignore the warnings and pleas of those who have lived here longer is thus not only foolish, but reminiscent of the processes by which Native lands have been taken, Native children have been forced into assimilation boarding schools, Native languages and cultures have been shunned, Native people have been openly discriminated against, and Native resources have been over-hunted and over-fished. Herring are not only an ecological keystone species, but a cultural keystone species, and the health of their populations is critical to the continuation of Lingit culture. To further reduce their population is then a continuation of colonization.

Furthermore, it is a violation of the United Nations Declaration of Rights of Indigenous Peoples (http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf):

Article 24

1. Indigenous peoples have the right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, animals and minerals. Indigenous individuals also have the right to access, without any discrimination, to all social and health services.
2. Indigenous individuals have an equal right to the enjoyment of the highest attainable standard of physical and mental health. States shall take the necessary steps with a view to achieving progressively the full realization of this right.

Article 25

Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.

Article 26

1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired. 2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. 3. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned

If we wish to conserve the herring population (as well as the thousands of other organisms their population health affects) and support the growth of Lingit culture, it is our duty to heed the concerns of Tlingit experts.



Submitted By
Alan Otness
Submitted On
10/2/2017 10:21:11 AM
Affiliation
Sitka sac roe permit holder

Phone
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Petersburg, Alaska 998330

Dear Chairman Jensen:

I am writing to give my support for proposal EF-F17-067. There are many good reasons why this proposal , open pound spawn on kelp as an alternative to seining , makes sense.

I was involved with the experiment to test the open pound idea in Sitka and came away from that experience enthusiastic about the possibilities. Let's make this happen.

Sincerely, Alan Otness. Sitka Sac Roe Permit Holder



Alaska Longline

FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

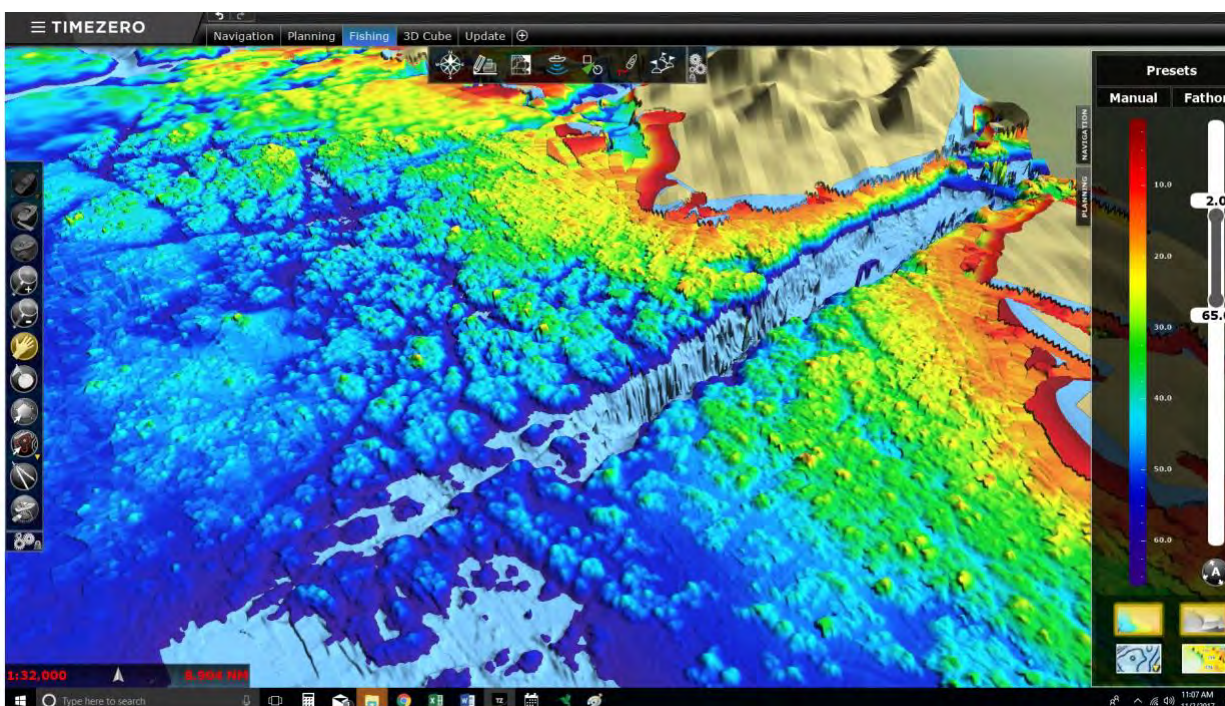
To: Alaska Board of Fisheries
From: Linda Behnken, Alaska Longline Fishermen's Association
Date: December 27, 2017

Subject: SE Groundfish proposals and general comment on SE Salmon management

Dear Members of the Board,

The Alaska Longline Fishermen's Association (ALFA) is a Sitka-based organization of vessel owners and deckhands committed to sustainable fisheries and thriving fishing communities. Our members longline for halibut, sablefish, and rockfish; many also troll, seine, gillnet or tender for salmon during the summer months. Before addressing specific proposals, I would like to provide you with an update on work ALFA initiated nine years ago in direct response to a challenge from the BOF.

In 2009, ALFA launched a Fishery Conservation Network to directly engage fishermen in research and conservation and to encourage collaboration between fishermen and scientists. In response to a challenge from the BOF, the first focus of ALFA's FCN was to identify high rockfish bycatch areas, map the habitat that concentrates rockfish in these areas, and provide our commercial fishing members with the tools to efficiently harvest target species while controlling rockfish bycatch rates. The Board issued this challenge to both commercial and charter sectors after a hard-fought rockfish allocation battle between the two sectors. To meet the challenge, ALFA initiated: 1) a rockfish bycatch logbook program to collect target species (halibut and sablefish) and bycatch rate data by set quadrant from members; and 2) a seafloor mapping network to create detailed bathymetric maps. To date, ALFA FCN members have contributed rockfish bycatch rate data for 1,105 sets (with catch verified by ADFG fish tickets), and 110 million bathymetric data points. ALFA has compiled this information and provided members with maps identifying rockfish bycatch hotspots and detailed interactive seafloor maps to assist members in improving fishing efficiency, controlling bycatch, and minimizing habitat disturbance. For illustration, a sample seafloor map is below, and an ALFA rockfish bycatch logbook page is attached to these comments. We are currently in the process of updating bycatch hot spots maps, and will share this update with the Board in January, but after the first three years of operating the rockfish network, members had reduced rockfish bycatch by 20% in the halibut target and 7% in the sablefish target (where rates were already well below bycatch allowances). Six years into the project, members were effectively controlling bycatch to allowed rates with minimal exceptions, and the longline fleet as a whole is remaining below its SE rockfish allocation.



ALFA Fishery Conservation Network bathymetric map: Whale Bay Area

Since 2009, ALFA has grown the FCN to include a number of other research and stewardship projects, including improved fleet fuel use awareness and efficiency, electronic monitoring of catch to provide small boats with a viable alternative to mandatory observers, and collaborative work to avoid marine mammal depredation on longline gear. We invite you to read about FCN projects on the ALFA (<http://www.alfafish.org/bathymetry/>) or SEASWAP (<http://seaswap.info>) websites. Again, the BOF catalyzed this effort, and we hope you find this update interesting.

With that introduction, we respectfully submit the following comments on the Southeast groundfish proposals before the Board in January 2018.

Proposal 116: proposal 116 will establish bag, possession and annual limits on the non-resident recreational harvest of sablefish. **ALFA supports this proposal.** Sablefish stocks in Southeast Alaska have been fully utilized since the early 1980s. Stocks are currently near historic low levels, and commercial fisheries have endured years of conservative quotas to safeguard the future of the stock. Meanwhile, sport harvest of sablefish has increased from less than 5,000 fish to over 13,000 fish between 2010 and 2016, increasing pressure on the stock and displacing historic harvesters. Good management demands all users share in conserving the resource. According to information provided to the Sitka Fish and Game Advisory Committee in November 2017, 95% of the sport harvest of sablefish is by non-residents. Extending the non-resident limits currently in place in District 12 (Chatham Strait and lower Lynn Canal) to the rest



of Southeast will provide ample harvesting opportunity to non-resident anglers while providing a measure of protection to the resource and those who have historically depended on sablefish stocks against the rapid growth of the guided sport industry.

In advocating for timely adoption of this proposal, ALFA would note the following:

- There is no limit on entry for sablefish anglers or guided sablefish operators. This proposal does not limit the number of people that can participate in the fishery but does establish reasonable harvest limits on non-resident anglers, balancing the interests of this growing sector against resource constraints and the dependence of historic harvesters.
- Bag, possession and annual limits combined with a system to more accurately account for catch will help protect the long-term sustainability of the sablefish resource while maintaining angler opportunity to harvest sablefish.
- Ongoing declines in halibut abundance and anticipated reductions in halibut catch limits are likely to increase non-resident/guided sport pressure on sablefish stocks.
- NMFS' 2017 trawl survey indicates that a strong year class may be poised to recruit to the sablefish fishery, but the survival and ultimate contribution of this year class to sablefish yield and productivity remains largely unknown. Protecting this year class and allowing what are now juvenile fish to survive and grow to maturity will determine the near and long-term future of this valuable fishery.
- Even with the proposed sablefish bag limit in place, non-resident recreational fishermen in Southeast will still be allowed a total groundfish/salmon daily bag limit of 35 fish, providing more than adequate harvesting opportunity.

ALFA considers the bag, possession and annual limits identified in Proposal 116 to be acceptable; that said **we support and recommend the more conservative limits adopted by Sitka Fish and Game Advisory Committee of 2 daily, 2 in possession and 6 annually.**

Proposal 117: ALFA opposes this proposal to allow pots in the sablefish personal use fishery. Although pots may have a lower bycatch of rockfish and halibut, the bycatch of crab in pots is higher. We also disagree with the proposer relative to the hazards of lost pots versus lost longlines: while most longline boats have the stability and hydraulic capacity to retrieve a longline tangled with another longline, many do not have the capacity to retrieve a lost pot. Furthermore, ALFA members' experience with lost gear is that longlines cease to catch fish after five to seven days, while pots will rebait and kill fish for up to a month.

Proposal 118- 121 would change season opening dates, allow groundfish pots in the SSEI Sablefish fishery, and/or provide additional harvesting opportunities to vessels deploying pots. **In our view, SSEI permit holders should have the opportunity to determine management policy for this fishery.** Relative to these proposals, we note the following: whale predation on hook and line-caught sablefish has never posed a significant issue in Southeast inside waters, but entanglement with lost pots certainly has. Adding additional pot gear to an area with a steep bathymetry and high currents can be expected to result in additional lost gear, which



should be weighed against any conservation claims made in favor of pots. ALFA notes that the majority of these SSEI proposals are submitted by a single individual who has a strong preference for pot gear and currently fishes multiple permits with pots but is interested in additional harvesting opportunity. Our membership believes the proposer should solicit input from SSEI permit holders to determine their interest in expanding the use of sablefish pots in this area and report that position back to the Board.

Relative to claims that whale predation is a resource threat and the sablefish catch limits of those harvesting with hook and line gear should be reduced, ALFA would remind the Board that predation on inside waters has been insignificant, and that sablefish are a natural prey species of sperm whales. There is little justification for the resource reallocation requested by the proposer.

Proposal 122: ALFA OPPOSES this proposal to eliminate the sablefish stock assessment on inside waters. While tagging data establish that sablefish do move between Chatham Strait, British Columbia and the Gulf of Alaska, stock trends can vary in scale, magnitude or timing. ALFA supports strong science-based management informed by the best available information, and we consider the ADFG inside water sablefish assessment to be an important component that management structure.

Proposals 127: ALFA supports this proposal, which directs the Department to manage non-resident and resident pelagic rockfish harvest separately, and to reduce non-resident bag limits for pelagic rockfish as needed to control harvest without changing resident bag limits. Resident harvest of pelagic rockfish has remained relatively stable for the past decade while non-resident or guided sport harvest has increased substantially. Reducing non-resident limits is an appropriate management response to increased non-resident harvest and will provide the necessary protection to rockfish stocks without unnecessarily reducing resident access.

Proposal 129: ALFA supports this proposal, which clarifies the commercial rockfish trip limit definition and reduces trip limits for the East Yakutat section to prevent guideline harvest level overages while still allowing a fishery to take place. We recognize the Department's concern relative to rockfish stock declines and support conservative management that prevents GHM overages.

Southeast salmon proposals: ALFA urges the Board to take appropriate action to conserve Southeast wild Chinook stocks of concern while minimizing impacts to Southeast salmon fisheries. In our view, these dual goals are best met by management actions that comprehensively address all user groups--sport, commercial, troll, seine and gillnet—and fairly assess the impacts of each user group to salmon stocks in general and the stocks of concern in particular. A number of proposals (e.g. 132-134) disadvantage one user group to the advantage of another under the unsupported guise of conservation; we urge the Board to guard against taking such irrational and allocative actions. Conservation demands ALL sectors fairly reduce harvest proportional to their impacts to stocks of concern; the only winners in the conservation battle should be the fish. Our review of data shared to date by the Department and compiled



by concerned salmon fishermen indicates that the Department is chronically underestimating guided sport harvest of Chinook and overstating troll impacts. We urge the board to look carefully at coded wire tag data as well as genetic data, and to ensure data are accurately expanded when monitoring is limited. Additionally, we urge the Board to carefully develop management strategies that protect stocks of concern while providing maximum access to healthy salmon stocks, and note that spatial/temporal management (i.e., allowing fishing in areas and during times of the year when historically catch of SE wild Chinook has been minimal) is far less damaging than closures of all areas across broad time periods. ALFA asks the Board to devote the necessary time to develop a spatial/temporal approach to Chinook management. While it will clearly take more of the Board's time and a more in-depth review of the data, such an approach will provide the necessary protection to stocks of concern while imposing far less cost on Southeast fishermen and communities than the more simplistic, broad-based closure.

Thank you for the opportunity to comment. We anticipate providing additional information and testimony to the Board during your January 2018 meeting.

Sincerely,

A handwritten signature in black ink that reads "Linda Behnken".

Linda Behnken

Alaska Longline Fishermen's Association
834 Lincoln Street Room 23
Sitka, AK 99835
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(907) 738-3615 (cell)

www.alfafish.org



Whale Hotline Number: 907-747-3600

Page ____ of ____ for trip

Vessel: _____ **ALFA Fishery Conservation Network Logbook Sheet: Bycatch**

Date: _____	% DSR _____	% DSR _____	% DSR _____	% DSR _____	Total for Set: DSR _____ Slope _____
Set: _____	% slope _____	% slope _____	% slope _____	% slope _____	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers
Trip: _____	% Target _____	% Target _____	% Target _____	% Target _____	Target _____
Target species: _____	_____ fm	_____ fm	_____ fm	_____ fm	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers

Observations : _____

Date: _____	% DSR _____	% DSR _____	% DSR _____	% DSR _____	Total for Set: DSR _____ Slope _____
Set: _____	% slope _____	% slope _____	% slope _____	% slope _____	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers
Trip: _____	% Target _____	% Target _____	% Target _____	% Target _____	Target _____
Target species: _____	_____ fm	_____ fm	_____ fm	_____ fm	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers

Observations : _____

Date: _____	% DSR _____	% DSR _____	% DSR _____	% DSR _____	Total for Set: DSR _____ Slope _____
Set: _____	% slope _____	% slope _____	% slope _____	% slope _____	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers
Trip: _____	% Target _____	% Target _____	% Target _____	% Target _____	Target _____
Target species: _____	_____ fm	_____ fm	_____ fm	_____ fm	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers

Observations : _____

Total pounds from fish ticket: Halibut: _____ Sablefish: _____ Yelloweye: _____ other DSR: _____

SR: _____ RE: _____ Idiots: _____ other slope: _____ pelagic rockfish _____



Submitted By
John Carle @ Delbert Kadake
Submitted On
12/28/2017 8:14:21 PM
Affiliation
Alaska Native Inter-Tribal Association of Seiners (ANITA)

ANITA, the Alaska Native Intertribal Association of Seiners, was formed in April of 2017. We currently have 25 seine members, both voting and associate. ***Our board of directors includes Frank Wright, of Hoonah, Jeb Phillips of Petersburg, Jeff Jackson of Kake, Secretary-Treasurer Nick Demmert, Vice President John Carle and President Delbert Kadake, of Kake.***

From the very first commercial fisheries conducted in SEAK, the Tlingit and Haida people were instrumental not only in the harvest but also the processing, shipping, trap-siting and spotting, and transportation in the seafood industry. Entire families have moved from their winter villages to the canneries, cold storages and fishing plants to sustain the industry. And the industry being sustained by us also sustained us with relatively recognizable and achievable economic activity. Much of the total community involvement has changed as have so much of our culture in these modern times but there is still a major economic connection and engine with our involvement with the salmon and herring especially with commercial purse seining.

Although the industry has consolidated and many former canneries near our villages have long since vanished the major direct connection that the Tlingit and Haida peoples and the approximately 30% of Southeast Alaska's purse seine fleet that are members of SEALASKA.

There is no disrespect intended upon those non-SEALASKA members or whose families came later to our fisheries nor is any disrespect intended to the other seine associations. We believe that it is time we ourselves weighed in with our own group on our fervent belief in the state of Alaska's management system being the correct way to go and supporting the best available science to insure that the continuing generations of Alaskans, native and non-native alike, can share in the amazing bounty nature has provided our people for several millenium.

Unlike many other jurisdictions in the US as well as Canada, we believe in one management agency, the state of Alaska, and fishing competitively alongside all other fishermen as equals.

We look forward to meeting with the Alaska Board of Fisheries members in Sitka. While several of our board will be winter crab fishing up and down the coast, we will be represented and be at all of the finfish portion of the meeting.

Sincerely,

John Carle, Vice President, Alaska Native Inter-Tribal Association of Seiners

Delbert Kadake, President, Alaska Native Inter-Tribal Association of Seiners

Proposals Supported by Alaska Native Inter-Tribal Association of Seiners

Support: 140, 142, 143, 145, 155, 166

Proposals Opposed by Alaska Native Inter-Tribal Association of Seiners

Oppose: 141, 146, 154, 156, 157, 158, 167, 168, 169, 170, 173, 174, 185



2018 Board of Fisheries Positions

ATA represents commercial hook and line salmon fishermen who operate in state and federal waters off Alaska. There are nearly 2,000 troll permits (2017 = 963 Powerroll / 959 Handtroll) and about half are fished each year. The troll fleet is 85% resident; about 1 in 35 people in Southeast Alaska works on a troll boat.

37 Allow gillnetting in waters near Kayak Island. Oppose

As the proposer states, this area was closed to Copper River fishermen in the early 1980s to protect Situk River and other depressed Alaska stocks. Around the same time, trollers lost fishing access West of Cape Suckling, due to similar conservation concerns. Trollers have statewide limited entry permits, but are currently restricted to the Southeast region. If Kayak Island is re-opened to gillnetting, we would like to also see West of Suckling re-open to the troll fleet. However, given that Chinook stocks from Prince William Sound to Dixon Entrance are experiencing a period of low productivity, it is difficult to envision either fishery being re-established any time soon.

123 Increase the minimum retention size for lingcod in the Eastern Gulf of Alaska Area commercial fishery. Oppose

The sponsors claim there will be positive impacts on lingcod recruitment from increasing the size limit to 30", but we have been unable to find data to support the extent to which that might be true. The size limit was originally established to protect sexually mature females and nest guarding males. It is also used as a means to keep the sport harvest within its allocation. This proposal includes no justification as to why the dorsal fin/tip of tail measurement was selected and it's unclear if use of those reference points is even appropriate. Based on ADFG statements and anecdotal information from the fleet, lingcod stocks in Southeast are abundant and subject to a conservative management program. Increasing the size limit does not appear to offer benefits for the resource, could reduce the commercial harvest, and is likely to shift effort away from male fish onto larger, more fecund females. That could ultimately harm the lingcod resource and all user groups.

132 Amend king salmon regulations in Districts 11, 12, 14 & 15 based on Taku River preseason escapement estimate. Oppose

This proposal would remove important flexibility from ADFG's management program. ADFG already has adequate Emergency Order (EO) Authority to implement measures to protect the stocks in question. See ATA comments on Proposal 133 regarding methodology and the Pacific Salmon Treaty.



133

**Base duration of commercial salmon troll and drift gillnet gear spring openings on
preseason king salmon abundance projections.****Oppose**

The proposer seeks to improve escapement by establishing arbitrary fixed parameters to control the length of troll and gillnet openings for king salmon in districts 9, 12, and 14, based on preseason forecasts of terminal run size. The recommended methodology is contrary to MSY escapement goal management and could therefore be ineffective at achieving the goal of recovering stocks to harvestable levels. Additionally, it could be allocative; removes management flexibility; and, prevents ADFG from doing anything inseason but further reduce harvest. This proposal is unnecessary, because managers already have, and are exercising, EO authority to implement the measures they believe necessary to protect the stocks in question, while also permitting safe levels of fishing when and where appropriate.

ADFG stated in a September 29, 2017 memorandum recommending stock of concern status for several Chinook stocks, including the Chilkat, '*...that very poor marine survival has been the primary factor behind the recent period of poor production of Southeast Alaska king salmon stocks.*' Consequently, we question the need to drastically modify Southeast Chinook management plans for what could be a short-lived situation that can be addressed through EO authority.

Proposal 133 relies on preseason forecasts of abundance coupled with a three-tier system to define management action for the troll and gillnet fisheries. The plan does not consider the fact that the Chilkat, Taku, and Stikine forecasts are all unique - which one will be used to dictate management? While use of inseason indicators is mentioned for reducing harvest in the event the terminal run prediction is poor, the proposal lacks specific provisions for lifting restrictions based on improved forecasts.

The Chilkat, Taku, and Stikine Chinook travel through districts 9, 12 and 14 at different times and in variable proportions. Managing effort in non-directed fisheries spread out over hundreds of miles, based on a randomly selected proportion of a forecast, does not necessarily deliver fish to the river. Still, the proposer wants to significantly restrict distant water troll fisheries, even when Taku kings are expected to meet the point goal. Why would any Southeast fishery be shut down for 'conservation' if stocks are expected to make the MSY goal?

ADFG managers put escapement first, as they should, and they have a history of consistently managing Southeast Chinook to achieve the MSY goal range. The Taku River Biological Escapement Goal (BEG) was established in 2009. The BEG is 19,000 - 36,000 large king salmon, with a point goal of 25,500. Since then, the lower end of the goal range has been missed just three times. The lower end of the range is simply that - anything within the range is considered safe and is anticipated to achieve MSY, which is why ADFG usually manages for the mid-point of the range. From 2012-2016, Taku River missed the lower end of the goal three times and the harvest rate averaged a modest 18%. For the same period, Chilkat River missed the lower end of the goal four times, and the harvest rate averaged just 14%. Given the low exploitation rates, it is clear that marine survival is having a significant impact on escapement performance.

Due to a variety of factors, recent preseason forecasts for the Taku and Stikine Rivers have been highly variable and at times unreliable. Using the fixed methodology suggested would make it easy to inadvertently take too many, or too few fish.



On June 9, 2011 ADFG issued a news release closing District 8 and Section 11-B, stating that the Stikine king salmon terminal run forecast had been revised down from 30,000 fish to 18,900; the Taku River projection was cut from 40,986 to 16,600.

On December 9, 2013, ADFG issued a terminal run size forecast for the Stikine River of 26,000 fish. The news release specifically stated that the actual forecast predicted 1,700 more fish, but due to recent year over-estimation of the run, and poor recent year performance of local stocks, ADFG was downgrading the forecast as a precaution. Actual escapement of large fish (>660mm) was within goal at 16,783.

Adjusting the forecast with inseason abundance estimates can also be challenging. In June 2015, ADFG noted that poor river conditions negatively affected the mark and recapture assessment program. The result was that ADFG left the preseason forecast unchanged, despite any run strength – or weakness – that might have materialized inseason. Actual 2015 escapements of large fish to the Taku and Stikine were 21,597 and 28,827, respectively, and well within goal.

Given the variability of forecasts, one could envision a time where the regulations in this proposal could require ADFG to open a fishery against their better judgement and place fish at risk, because river conditions don't allow for a revised inseason stock assessment and the forecast was not upgraded. Conversely, it could also restrict traditional harvests unnecessarily, by implementing punitive restrictions - even when a forecast is well within the MSY escapement goal range. Better to leave the decision in the hands of ADFG, so they can rely on the variety of tools at their disposal to evaluate stocks and manage fisheries inseason.

This proposal is also contrary to an agreement under the Pacific Salmon Treaty (PST) relative to the Taku and Stikine rivers and could cost Alaska harvest share. Alaska and Canada spent a considerable amount of time negotiating the conditions that would allow directed fisheries on these stocks. For the Taku, it was decided that achieving midpoint of the escapement goal was best for conservation. Directed fisheries are allowed whenever the District 11 terminal run size is predicted to be equal to, or exceed, the midpoint escapement goal. The terminal run size estimate accounts for the troll harvests outside D11 (PST, Annex IV Chapter 1 3. (b)(3)(viii) Footnote 6, p.37), which are counted under the annual PST Chinook quota. There is a similar harvest sharing plan between Canada and Alaska for the Stikine River. Proposal 133 would effectively override this fundamental agreement between the countries and could cause Alaska to forego a portion of its negotiated harvest share, even when there are adequate fish returning to the system to meet escapement and fish.

The proposer targets troll fisheries that are far removed from the Chilkat and Taku rivers, yet there is no mention of sport fisheries in the areas we fish, or the fact that up to 20% (13% on average) of the sport Chinook harvest in Petersburg-Wrangell are Taku fish (Mixed Stock Analysis of Chinook Salmon Harvested in the SE AK Sport Fishery, 2004-2015, S. Gilk-Baumer, et al., in progress 2017). Trollers don't really have much direct impact on these systems.

The BOF developed the Taku River Management Plan (5 AAC 29.097) in District 11 to implement the PST agreement. It currently provides almost no opportunity for trollers to target Taku Chinook in years of allowable harvest. During the years a directed treaty harvest was allowed, trollers caught less than 50 fish, while the gillnetters caught more than 30,000.

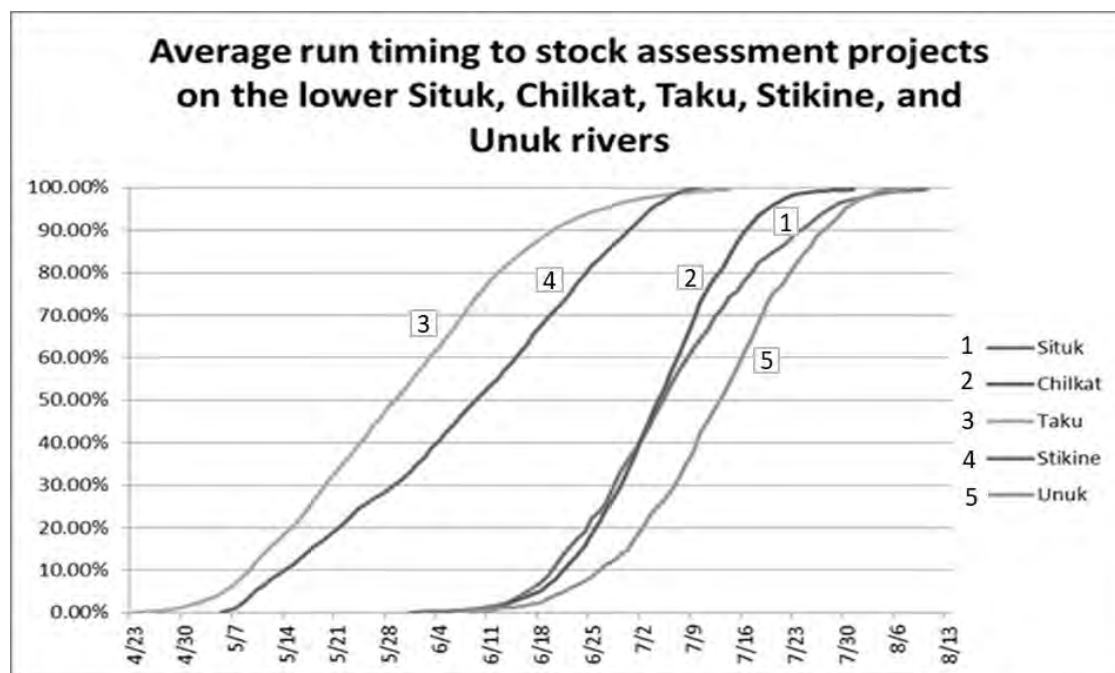


The Chilkat River is raised as a concern in this proposal. The troll fleet is already managed to provide protection for a stock that we are barely allowed to harvest. From 2007-2016, ADFG estimates the spring troll fishery averaged 123 Chilkat fish; during the most recent five-year period that average fell to 51 fish (ADFG, 8/17). While Chilkat has been listed as a stock of concern, note that in two of the years the stock came in under goal, escapement was missed by just 27 fish one year and 31 the next. It would be difficult for a terminal fishery to pass that small a number of fish to the spawning grounds without significant disruption, much less one that mostly occurs one hundred miles away, or more.

The troll fleet is already restricted in time and area from direct harvest of Chilkat king salmon through the Lynn Canal and Chilkat River King Salmon Fishery Management Plan (5 AAC 33.384) (33.384(e)(1)) closes the troll fishery north of Seduction Point through July 14. By that time, 100% of the Chilkat River Chinook run has usually entered the river (see graph below). In recent years, ADFG has taken added precautions in the outer corridors during the late winter and spring troll fisheries to further protect this depressed run, including troll closures.

While we don't support this proposal for any fishery, the restrictions called for do not treat the troll and gillnet fisheries equally in all but one case. For example, the gillnetters would lose their directed fishery in front of the river, but could still retain king salmon taken during other fisheries. Trollers would have to give up significant numbers of wild and hatchery kings and coho, some distance from the river where Taku River Chinook are only taken in small numbers, and mostly during fisheries directed at the hatchery king salmon we pay for. Both fisheries would be denied the directed PST fisheries on both the Taku and Stikine.

The proposed plan also fails to adequately consider differences in run timing of either the stocks referenced or the fishery. As you can see from the graphic below, run timing is unique for each of these stocks. If the goal is to get fish into the rivers, it makes more sense to manage all fisheries and recognize this timing. For instance, restrictions should be lifted from the more distant troll fisheries on a date earlier than the terminal sport and net fisheries.



ADFG, 2017



Management actions to address conservation must be timely and contextual. ADFG uses preseason and inseason forecasts long with other pertinent data to make management decisions. When problems or opportunities arise, managers must have the flexibility to respond, as evidenced by significant actions taken in recent years, especially in 2017, to protect Taku, Chilkat, Stikine, etc. We believe that ADFG has the expertise, tools, and management plans necessary to balance conservation with fishing opportunity – no new regulations are needed here.

ATA fully appreciates the need for conservative management of all fisheries harvesting Southeast Chinook stocks during this time of uncertainty. However, late winter and spring trolling is an important source of revenue for rural fishing communities, so it is important that conservation measures are effective in getting fish to the rivers and that fishing opportunities be provided whenever possible. Harsh weather conditions can make it tough for fishermen with small vessels to compete in winter and early spring. Districts 9, 12, and 14 are relatively protected areas that provide good fishing opportunities for small boat owners and others from the inside communities. A portion of the spring troll Chinook catch is sold fresh, which typically yields a higher price for the fleet and processors. Spring fisheries help the industry maintain a year-round market share and compete with farmed salmon.

134 Close the spring commercial salmon troll fishery in Districts 9, 12, and 14 when the Juneau area sport fishery is closed to protect king salmon. Oppose

ADFG has EO authority to implement appropriate measures to protect the stocks in question. ADFG’s highly precautionary management actions in 2017 and current proposals for several stocks of concern, including Chilkat, show that the department will act when necessary to achieve escapement goals. This has already involved time/area closure of troll and sport fisheries.

It’s important to remember that the current low productivity is not limited to the Taku and Chilkat rivers, it’s regionwide, extending as far north as the Copper River in recent years. This looks to be more about marine survival than fishing. ADFG has managed prudently during this time of uncertainty. The department managers should be allowed to maintain the flexibility necessary to manage fisheries according to data and inseason circumstance. It is far to early to revamp management plans on a permanent basis, particularly on stocks that until just recently were among the most robust on the West Coast.

136 Extend the area closed to sport fishing near Situk River weir in June and July. Support

139 Eliminate provisions for a rotational fishery in Southeast Cove Terminal Harvest Area and allow the department to manage the fishery in consultation with the hatchery operator. Support

144 Allow increased commercial salmon fishing opportunity with troll gear in the Deep Inlet Terminal Harvest Area. Oppose



146 Do not include enhanced salmon produced by private nonprofit hatcheries in Southeastern Alaska Area Enhanced Salmon Allocation Management Plan gear-specific value allocations.

Oppose

This proposal seeks to remove the value of salmon produced at the private non-profit (PNP) hatcheries from the 5 AAC 33.364 Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (allocation plan) and states that not counting the PNP fish would help the fleets achieve their allocated percentages without disrupting hatchery production or other fisheries. The maker of this proposal seems to think that the Prince William Sound (PWS) allocation plan is superior, because it doesn't include PNP fish. Ironically, other fishermen have submitted BOF proposals asking to add the value of PNP production to the PWS plan, because they see that removing PNP fish can result in a single user group disproportionately benefitting from the region's enhanced production, despite a regional allocation plan.

The proposal also suggests that the PNP hatcheries have less financial wherewithal than the Regional Associations (Regionals). While they don't directly receive 3% money, PNP hatcheries have received special considerations and utilize the same pools of public funds as the Regionals; this has allowed PNP operators to expand their facilities and thrive. Therefore, it seems fitting that the value of the fish produced at PNPs be included in the allocation plan.

Finding 94-148-FB contains the original report of the Southeast Alaska Allocation Task Force (SATF) submitted to the BOF and ultimately set into state policy. It established the allocation plan parameters and specifically included enhanced salmon from the PNPs. PNP operators have had a voice and a role to play since the beginning of the enhancement program. The SATF included a representative of Douglas Island Pink and Chum (DIPAC) hatchery. Numerous project proposals have been submitted by the PNPs that include the allocation plan as part of the justification.

The allocation plan included fourteen guiding principles and performance goals. Since they do not derive revenue from the 3% salmon enhancement tax, PNP's were granted special dispensation under guiding principal #1. Specifically, until a PNP state loan debt is repaid, the plan allows PNP's to drop their contribution rate to the common property fishery from 70% to 60%.

Like the Regionals, PNPs that achieve the performance goal and apply for a loan under the Fisheries Enhancement Revolving Loan Fund have been recommended for priority funding. Some Southeast PNP's have received financial and in-kind assistance from the Regionals. Most have secured millions of dollars in Pacific Salmon Treaty (treaty) mitigation money, to produce fish to help mitigate losses under the treaty and balance the enhanced salmon allocation.

The maker states that the PNP boards won't always be made up of a good mix of fishermen. That is a legitimate concern, but history reveals it to be largely unfounded. At least two PNP's in the region have evolved in such a way that they now include board seats for all commercial salmon fisheries.

The troll fleet has chronically lagged behind on its allocation of 27-32%. The seine and gillnet preliminary allocations are 43% (44-49%) and 39% (24-29%), respectively. Our preliminary five year rolling average is 18% (2012-2016). Still, we do not support at this time modifying any aspects of the plan through proposals or a task force, as was suggested during the October 2017 Work Session. Doing so would be an unnecessary expenditure of time and monetary resources for all involved.



The reasons that the troll fleet has been unable to reach its allocated percentage are many and varied. For instance, spring conservation measures are currently having a negative impact the troll fleet’s hatchery harvest and will do so for a while. The Regional Planning Team (RPT) and individual operators have been working hard to resolve the problem by searching for the right mix of solutions to bring trollers into range. Southeast is a large region and each hatchery operator is uniquely challenged when it comes to delivering fish to the fleets. Emerging opportunities to target hatchery Chinook, coho, and chum should help better distribute hatchery fish and improve the allocation numbers, but that will probably not be possible for the troll fleet if the PNPs are removed from the equation. Klawock Hatchery was a PNP until just recently and that facility alone has contributed up to 100,000 coho a year to the troll fleet. Trollers catch lots of fish contributed by the PNP’s and removing that production value from the allocation could seriously impact our fleet’s ability to attain its allocation target.

Therefore, ATA prefers that no action be taken on this proposal. The RPT and hatchery operators should continue to work within the parameters of the current allocation plan, in hopes of ultimately achieving the original goals that the BOF established for all the Southeast commercial fleets.

- 148 Expand the Herring Bay Sportfish Terminal Harvest Area to provide additional sport fishing opportunity for hatchery-produced king salmon. Oppose**

This proposal would expand what is already a fairly large terminal area in a corridor for depleted Unuk River Chinook salmon, as well as increase the sport bag limit. There is a high likelihood that a significant number of Unuk River fish will be caught if this proposal is passed.

For the past three years, significant management restrictions and closures have been implemented in the spring troll fisheries targeting hatchery fish in this area. 2018 is likely to see additional restrictions to protect Unuk River Chinook.

The Unuk River was recently added to the stocks of concern list and the BOF will consider an action plan for this stock at the January meeting. It is unacceptable at this time to contemplate increasing Chinook harvest opportunity for any fleet fishing in the terminal areas where Unuk River fish are the most vulnerable.

- 149 Extend the closing date for salmon harvest by the hatchery permit holder in Deep Inlet Special Harvest Area. Support**

- 150 Establish a special harvest area in Crawfish Inlet. Support**

Proposal 150 expands the SHA past 135’ 11.05’ W, specifically to benefit the troll fleet. The project was permitted with the understanding that it could help address allocation imbalance. Chinook will begin returning to Crawfish Inlet next spring and early indications suggest that the run could be large.

NSRAA plans to release up to 600,000 Chinook salmon and 50 million chum salmon at Crawfish Inlet. This program could inject roughly \$4 million dollars into the common property fishery and provide great benefits to all three commercial salmon fleets, processors, sport fishermen, and local communities. The expanded area as envisioned would allow a spring SHA fishery in very



Significant conservation measures were taken in 2017 for both Stikine king salmon and McDonald Lake sockeye. The Stikine Chinook are down, and McDonald Lake was recently added back to the stocks of concern list, making this proposal poorly timed. If the proposed fishery expansion is allowed, it could negatively impact Chinook and sockeye moving to the river and disrupt existing troll fisheries targeting hatchery kings at Steamer Bay and lower Stikine Strait.

6-D is right next to D8. Increased exploitation of Stikine Chinook in these terminal areas could place too much pressure on the run, particularly if the very low forecasts prove to be correct.

- 170 **Open a portion of District 10 the third Sunday of June to commercial fishing for salmon with drift gillnet gear only.** **Oppose**
- 173 **Allow commercial fisheries using troll gear to target enhanced chum salmon in Districts 12 and 14 to continue by removing the sunset provision.** **Support**

The BOF originally approved the Northern Chatham Strait Enhanced Chum Troll Fishery as an experimental fishery with a sunset date, due to a lack of data. Far more is known about the fishery now and we would like to see the sunset date removed and the management plan placed permanently into regulation.

The Chatham Strait chum fishery is very productive some years, and not so much in others. Weather conditions, sea surface temperature, tides, run timing, and other factors must line up just right for chum to bite troll gear. Nevertheless, the District 12 and 14 chum fishery often accounts for a sizable portion of the troll fleet’s enhanced salmon allocation. The continuation of this fishery is part of the RPTs strategy for addressing the allocation imbalance.

Overall, this has proven to be very clean and selective fishery. About 85% of the chum harvested are hatchery stocks and the wild chum indicator stocks have consistently met escapement goals. There have been no known conflicts with anglers utilizing the area.

If this fishery were to close, effort would shift. Trollers who would normally target chums at that time may fish for Chinook instead. This would be undesirable side effect during this time of extreme conservation concern; distributing effort over the two species might be preferable.

Icy Strait, Southeast Cove, Neets Bay - and soon Port Lucy and Thomas Bay - form a suite of summer chum opportunities that not only give trollers options, but also spread out effort making for increased harvest efficiency. These fisheries combined with fall chum opportunities at Sitka, Crawfish Inlet, and Neets Bay are an important part of the strategy for addressing enhanced allocation.

Failure to pass this proposal would end the Chatham Strait chum fishery and eliminate an important market. Consumers have come to recognize the extremely high-quality chums this fishery provides and that’s created a unique market niche that will be difficult to backfill. Trollers, tenders, fish processors, the communities of Hoonah, Gustavus, Elfin Cove, Excursion Inlet, Juneau, Haines and others would suffer an economic hardship if the opportunity to harvest of these fish was lost.



174 Establish commercial fisheries targeting enhanced chum salmon using troll gear in portions of Districts 9 and 10. Support

The strategy to address the troll hatchery allocation imbalance is to direct “new production” toward trollers when and wherever possible. The plan, often cited in RPT reports to the commissioner, lists a suite of new troll opportunities that include Crawfish Inlet (NSRAA), Port Lucy (AKI), and Southeast Cove (NSRAA). Crawfish is a fall chum run and hatchery returns peak in early to mid-August. Lucy and Southeast Cove are summer chum runs and returns peak in early to mid-July.

It is assumed that trollers will be able to intercept chums returning to Southeast Cove along the West shoreline of Kuiu Island in Chatham Strait, and around Kingsmill into Frederick Sound, and into Keku where Southeast Cove is located. Though full production at Southeast Cove is just now coming to maturity, there has not been much troll effort. This year looks to be the first time the essential elements of fish, infrastructure, and a fleet will come together. It is highly likely chums will be migrating along Kuiu near Kingsmill from mid-June into July. Another project in the works is to develop a chum return at Gunnuk Creek near Kake. These fish are likely to pass through the Southeast Cove area and could further assist in rectifying the enhanced hatchery imbalance. The benefits to the community of Kake will be significant.

There is no directed chum salmon troll fishery in D9 & 10, so before July 1 chum harvest can only occur during spring Chinook fisheries. Considering the serious conservation concerns over spring Chinook it seems likely that troll opportunity will be quite limited in June, thus the need for Proposal #174, which would allow a directed chum fishery to occur in June, even in the event of a Chinook closure.

Although the boundaries for the area were set in consultation with ADFG, there has apparently arisen some concern over wild summer chum runs in Saginaw and Security Bays. Our understanding is that ADFG is willing to work with NSRAA and industry to define new boundaries. ATA supports efforts directed toward developing this valuable area to access enhanced chum salmon in a way that protects wild stocks.

176 Establish a commercial fishery using troll gear to target hatchery-produced chum salmon in Crawfish Inlet during the coho closure. Support

Crawfish Inlet release site has been developed, in part, to provide opportunities for trollers to harvest hatchery chum salmon and attempt to better balance the allocation of enhanced salmon. The troll fleet is typically closed in mid-August for 2-10 days, to provide for coho allocation and/or conservation; this closure occurs during the peak of the Crawfish chum return.

Current regulations provide for two other hatchery areas to remain open to trolling for chum salmon during the coho closure. We ask that Crawfish Inlet be added to this short list of areas. The entire Inlet has been preliminarily designated as a Terminal Harvest Area, which suggests that the presence of wild coho should be negligible.

177 Allow commercial fishing with troll gear for hatchery-produced coho salmon, in certain areas, during commercial troll fishery coho salmon conservation closures. S



We ask that ADFG be given authority to evaluate and open to trolling areas where the harvest hatchery coho during the August troll closure. Allowing ADFG to make determinations on an annual basis will ensure that wild stocks are protected and hatchery broodstock needs are met.

The justification for allowing harvest of hatchery coho during the coho closure is as follows:

a) alleviates some of the imbalance of enhanced salmon allocation; b) provides benefits to smaller vessel operators that might not be able or willing to fish in rough outside waters; and, c) to a small degree, reduces hatchery straying.

Enhanced Benefit Distribution

5 AAC 33.364 describes the guidelines for allocation of enhanced fisheries benefit to the three commercial gear groups of Southeast Alaska. The trollers have been below the allocated range for 23 years and have not been in the guideline range of benefits since the 1990-1994 5-year period. The Regionals and RPT address this issue in all new enhancement plans and the THA fishing schedules.

Board of Fish finding 94-148 FB describes the consensus process that generated 5 AAC 33.364. The findings included 14 guiding principles for the allocation of enhanced fisheries benefits. Guiding Principle 1 defines the purpose of the enhanced salmon program as a benefit to traditional common property fisheries. Guiding principle 11 along with the rationale anticipated the possibility of the June Chinook troll openings as well as other openings.

Guiding Principle 1:

The primary goal of the Southeast Alaska salmon enhancement program is to provide additional fishing opportunities and revenue to traditional common property fisheries.

The performance goal is the 70% or 60% contribution to common property fisheries after broodstock collection from the Regionals and/or PNPs, respectively. NSRAA and SSRAA documents (https://www.nsraa.org/?page_id=2879) (<https://ssraa.org/historic-return-information/>) indicate the coho programs generally do not meet this goal. It is our opinion that however slightly, approving this proposal will move the coho program more towards the performance goal of 60% or 70% contribution after broodstock removal.

Guiding Principle 11:

Achieving these allocation percentage goals should not result in any modifications, in time or area, to the traditional "wildstock" fisheries. Minor modification may be considered to allow experimental or test fisheries that would not adversely impact wildstocks.

Rationale:

The SATF strongly believed that the common property fisheries for wildstocks should not be manipulated in order to achieve the allocation percentage goals. However, this is not intended to preclude experimental or test fisheries, special hatchery access fisheries or the establishment of new special harvest areas in order to access enhanced fish. For example, this could include the June troll fisheries for Chinook, or late season openings, or other special openings used to target enhanced fish as long as wildstocks are not adversely impacted. It is recommended that the department allow targeted fisheries on enhanced stocks when they will not adversely impact



sustained yield of wildstocks. The department should work closely with hatchery operators in establishing these fisheries, keeping in mind the 70% and 60% contribution goals. The harvest of enhanced salmon in a targeted wildstock fishery is considered incidental to the harvest of wild stocks.

As this Board knows, the June troll Chinook openings are limited and highly regulated, to conserve wildstock Chinook in Southeast Alaska. This negatively affects the proportion of enhanced benefit achieved by the troll fleet. Proposal 177 seeks to add an avenue for the troll fleet to increase their harvest of enhanced coho. **At the moment, the only impediment to doing so is that when the department closes coho for both allocative and conservation reasons, they close both wildstock and enhanced coho.** Proposal 177 allows targeted fisheries on enhanced cohos, while observing all the guiding principles of finding 94-148 FB and all conservation requirements for wildstock coho.

Magnuson-Stevens National Standards

It is anticipated that the areas opened for enhanced coho will be very close to the hatchery or a release site. This will likely mean that smaller boats that suffer competitive disadvantages in bad weather will be able to fish these openings. Magnuson-Stevens Fisheries Conservation Act National Standards 8 (communities' social economic well-being) and 10 (safety at sea) are more closely adhered to when fisheries are available that don't involve going out in the ocean when it is blowing 35 knots on opening day.

Reducing Straying

ADFG is currently monitoring the extent of straying, primarily in the vicinity of hatcheries. One published report involved a survey of recovered CWTs from spawning areas and found little evidence of straying (Special Publication No. 10-10 Wild and Hatchery Coded-Wire Tagged Coho Salmon Recovered as Strays in Natural Spawning Escapements in Southeast Alaska, 1976–2007, L.D. Shaul, April 2010).

Straying of enhanced fish into wildstock spawning areas is a topic that is currently receiving much attention by researchers. Having additional fishing pressure on hatchery stocks reduces potential straying.

Potential Applications

Informal discussions with ADFG staff indicate the most feasible area to implement this proposal is near Klawock Hatchery on Prince of Wales Island. CWT recoveries indicate very few wildstock coho are harvested close to the hatchery, while catch rates on hatchery coho are relatively high.

Proposal 177 does not direct ADFG to allow coho retention in particular areas, but asks ADFG to work with the hatcheries and troll stakeholders to develop areas that meet all conservation and allocation criteria and *could* be opened during general coho closures. Thus, this proposal asks the Board of Fish to allow ADFG to adaptively look for opportunities instead of telling ADFG what to do. We are hopeful the Board agrees with us that adopting this proposal and creating opportunity for the troll fleet, while allowing ADFG to carefully consider all conservation issues before granting access to hatchery coho, is in the best interest of wildstock coho, ADFG, hatcheries and trollers.



- | | | |
|-----|---|----------------|
| 178 | Restrict fishing area in Sitka Sound when harvest of non-Alaska hatchery-produced king salmon reaches 30,000 fish by March 1. | Oppose |
| 179 | Adopt measures to reduce harvest rate in the winter commercial salmon troll fishery during times of high king salmon abundance. | Oppose |
| 180 | Reduce triggers in the Southeastern Alaska Area spring commercial salmon troll fishery by five percent in years of high king salmon abundance. | Support |

Proposal 180 seeks to allow trollers to catch a few more of the enhanced salmon they are allocated, by lowering the percentage triggers in the spring troll fishery by 5% when abundance is high. This provision would only be implemented in years of high abundance, and would not disrupt the king salmon management plan or reallocate a substantial portion of the troll Chinook quota to the spring troll fishery. In years of high abundance, decreasing the percentage triggers by 5% would simply allow trollers to catch more Alaska hatchery Chinook.

This proposal is designed to keep spring troll fisheries open in years of exceptionally high Chinook abundance, which we have defined as an abundance index of 1.95 or higher, or some equivalent measurement of abundance (e.g. treaty quota of 337,000 or more). Southeast Chinook abundance reached this level in 2014 and 2015, when the Columbia River enjoyed the largest fall Chinook runs since the dams were erected in the 1930s.

From April through June many small areas are opened to trolling near hatcheries, or in corridors where Alaska hatchery fish are known to transit. The spring troll fishery is structured to target Alaska hatchery Chinook and all areas are held to Guideline Harvest Levels.

Since the goal of the spring fisheries is to catch Alaska hatchery fish, a set of triggers was established by the BOF, which define the minimum percentage of Alaska hatchery Chinook that must be harvested each week to keep the spring hatchery areas open to trolling. When a cap is reached, the area closes.

The massive abundance in 2014 and 2015, caused the winter fishery and many spring troll areas to be restricted or close prematurely. Many of the treaty fish that put us over the caps were mass marked hatchery salmon from the Columbia River, which count against the Chinook quota. This proposal would help alleviate the problem of fishery closure, and help ensure trollers have a full opportunity to catch enhanced Chinook salmon should a comparable situation arise in the future.

Under this proposal, the reduced triggers would only be implemented at extreme abundance levels and will have no impact on the fishery during years of mid-to-low abundance, (<1.95 or equivalent) when the existing triggers would be in place.

Reducing the percentage triggers by 5% in years of high abundance will allow trollers better access to hatchery Chinook and help alleviate the enhanced salmon allocation imbalance.

If implemented, most of the troll treaty allocation of Chinook would still be harvested in the summer troll fishery and the winter troll fishery would not be impacted in any way.



- 181** **Reduce the percentage of remaining commercial king salmon troll fishery harvest taken during the initial summer king salmon retention period from 70% to 60% during years of high king salmon abundance.** **Oppose**
- 182** **Establish a starting date for the reopening the summer commercial king salmon troll fishery.** **Oppose**
- This proposal ties ADFG's hands too much - they need to be responsive to timing of the resource in relation to management goals of conservation and moving coho to inside fisheries.
- 183** **Modify commercial salmon fishing closed waters adjacent to the Situk River.** **Support**
- This proposal would move the Eastern boundary two miles West, to compensate for the ever-changing Situk River mouth. An oversight during the 2012 Board of Fish cycle meant that only the Western boundary was changed, which reduced the amount of area open to trolling. The changed boundary is needed to protect troll access to the area.
- 184** **Modify gear specifications for the commercial salmon hand troll fishery.** **Support**
- 185** **Increase opportunity to harvest salmon and allow additional gear types in the Southeastern Alaska Area personal use salmon fishery.** **Oppose**
- 186** **Define what constitutes a 'guest' of a lodge, charter vessel, or other enterprise.** **Support**



Alaska Trollers Association
Recommendations on Southeast Chinook Stocks of Concern Action Plans
December 28, 2017

ATA offers the following recommendations on the Chinook stocks of concern action plans. The timing of the listing and release of the plans has made it difficult for our association to craft a more complete response by deadline. It is likely we will add to the record as this matter proceeds. We look forward to further communications with the Board of Fisheries and ADFG before and during your January deliberations.

UNUK RIVER ACTION PLAN: SUPPORT Option B with modifications below.

CHILKAT/KING SALMON RIVERS ACTION PLAN: SUPPORT Option B with modifications below.

TROLL FISHERY

Winter

Conduct the winter fishery October 11 to March 31, under the terms of the existing management plan.

Spring

1. May and June: open spring sub-districts that typically have a low presence of Unuk, Chilkat, and King Salmon rivers wild Chinook.
2. Provide expanded areas for spring troll hatchery harvest directly outside and near the THAs, where practicable.
3. Ensure that all available chum fishing opportunities be made available to the troll fleet.

Summer

1. Open the summer Chinook fishery July 1, under the terms of the existing management plan.
2. Leave THAs and all spring access and chum areas open until the general king salmon opening,
3. Ensure that all available chum fishing opportunities be made available to the troll fleet.
4. Provide opportunities for trollers to harvest hatchery coho during the August coho closure.



Delisting Criteria

- Set reasonable goals for delisting and attempt to get the fleets back to regular fishing regimes as soon as possible.
- Provide ADFG the flexibility to reduce restrictions as the stocks recover.

Additional Points

- Keep Action Plan management separate - do not permanently modify the existing fishery management plans.
- Use ADFG Emergency Order authority to implement the action plans.
- Implement fisheries regulations and action plans in a way that minimizes disruption and maximizes economic opportunity, while also paying heed to conservation and rebuilding stocks of concern.
- ATA opposes the use of a Mark Select Troll Fishery.



Submitted By
Allen Pool
Submitted On
12/19/2017 11:39:53 AM
Affiliation

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Monterey, California 93940-6123

C. Allen Pool

273 San Bernabe Dr.

Monterey, CA 93940-6123

831-372-5564

December 17, 2017 I'm in opposition to proposal 165. For the reason(s) stated in this letter.

November 1, 2008

To Whom It May Concern:

With the exception of one year, I have, since 1998, had the pleasure of fishing on the Tsiu River as a guest at the camp of the Alaskan Wilderness Outfitters Company in either August or September. Each trip was unique. The setting is beautiful beyond words as has been the abundant supply of incoming Silver salmon.

Only one feature has prevented the experience from being perfect. That has been the bad manners, rudeness, and illegal activities of some of the commercial fishermen. Each time that I have fished on the river at the same time as the commercial fishermen, some of them, not all, have used their boats to interrupt me and others while we were fishing a school of fish. They would run and circle their boats between us and the school of fish so as to herd the school into their nets. Many times, they have done so without regard for our fishing and our safety.

At the times I and others have called out to them, they expressed their rudeness by saying such things as "I'm just making a living", "This is my income", or "F..... you". This past September a woman was fishing about 15 yards to my left. There was a school of fish between her and the opposite bank. A commercial fisherman raced between her and fish and commenced circling in front of her and herding the fish to his net. In doing so, he came dangerously close to her. When she called out to him, he respond holding up to her his middle finger.

I don't begrudge the commercial fishermen their right to fish or to make a living. However, they should do without infringing upon the rights of others and without violating the law. Greater enforcement of the fishing regulations is needed. Without vigors enforcement, those commercial fishermen who have behaved badly and have violated the law will continue to behave badly and violate the law.

Respectfully,

C. Allen Pool



ANB/ANS Grand Camp
Portland, OR October 2017



Resolution #17-01

Title: Restoring Subsistence Priority for Herring

WHEREAS, Pacific herring are considered an ecological keystone species for the role they play in transferring energy for primary and secondary producers to upper trophic level species, and

WHEREAS, Pacific herring have been utilized by Alaska Natives since time immemorial and are considered an ecological keystone species, and

WHEREAS, subsistence herring egg harvest surveys conducted by the Alaska Department of Fish and Game's Division of Subsistence (DoS) that in the last eight years subsistence needs have been met less than 50% of the time, and

WHEREAS, the results of the DoS subsistence herring egg harvester surveys show that the State of Alaska has failed to provide adequate opportunity for subsistence harvesters to meet their needs, and

WHEREAS, twice in the last 6 years the State of Alaska has grossly overestimated the spawning biomass of the Sitka Sound herring stock resulting in a flawed guideline harvest level and put the future of the stock and the ability of subsistence harvesters to meet their needs at risk.

NOW THEREFORE BE IT RESOLVED, that the ANB/ANS strongly support 2017-2018 Board of Fish proposals 98, 99, 105, and 106, and strongly recommend that the Board of Fish do pass these, and

BE IT FURTHER RESOLVED THAT the ANB/ANS vehemently opposes 2017-2018 Board of Fish proposals 94 and 104 and recommends the BoF eliminate these proposals

BE IT FINALLY RESOLVED, that the ANB/ANS strongly supports 2017-2018 Board of Fish proposals 98, 99, 105 and 106 and recommends the BoF adopt these proposals.

/s/ Sasha Soboleff, Grand President
Alaska Native Brotherhood

/s/ Cecilia Tavoleiro, Grand President
Alaska Native Sisterhood

/s/ Devlin Anderstrom, Grand Secretary
Alaska Native Brotherhood

/s/ Carol Duis, Grand Secretary
Alaska Native Sisterhood



Submitted By
Ben Hinde
Submitted On
12/19/2017 4:52:30 PM
Affiliation

Proposal #235

I support proposal #235. I agree with a size, sex and fixed season approach. Keep the fishery simple and fisherman fishing.

Submitted By
Ben Hinde
Submitted On
12/19/2017 4:45:30 PM
Affiliation

Proposal #54 Dungeness pot reduction

I oppose proposal #54. As a person that has owned a 75, 150 and now a 225 card, I dont believe decreasing pot numbers is a good direction to take the fishery.



Submitted By
Benjamin Atwood
Submitted On
12/26/2017 2:07:35 PM
Affiliation

Phone
907-617-5718

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Address
Box 583
Ward Cove, Alaska 99928

My name is Ben Atwood. I am a Commercial Salmon Troller and I reside in Ketchikan. I support proposal 183 and oppose proposal 148.

Proposal 148. This proposal is aimed to expand the Herring Bay terminal harvest area directly into the Unuk River Chinook corridor. This proposal also would remove the Non-resident annual sport limit for Chinook caught within this area. I believe that the issues with Unuk River Chinook returns are far too concerning to consider this proposal at this time.

Proposal 183(Modify commercial salmon fishing closed waters adjacent to the Situk River) Originally the department added a small area directly outside the Situk River to ensure that enough Coho made it into the river to support the multitude of in-river fisheries that take place on this system. In 2012 the department modified the western boundary of this area, moving it approximately 2 miles westerly to keep up with the ever changing Situk River mouth. Incidentally that proposal didn't just move the closed area, but expanded it due to the eastern boundary not following suit with the change of the river mouth. I believe this proposal will correct this error, while still leaving the same size closed area in front of the Situk River to ensure the Coho run continues to remain strong with plenty of fish for the in-river sport and net fisheries.

Sincerely, Ben Atwood



Submitted By
Bethany S Goodrich
Submitted On
12/26/2017 10:09:49 AM
Affiliation
Ms.

Sitka is a glorious place and locals know, herring season is one of the most spectacular times of year for our coastal community. The animals return, the sunshine lengthens and the sound foams turquoise. I have been following the herring subsistence harvest intently for three years on the water traveling throughout Sitka Sound with different subsistence users. All users I have met, from Sitka residents to visitors from Hoonah and Angoon, have concerns about a more unpredictable, less consistent and more scarce herring egg harvest. Herring are the critical base of our ecosystem. The natural resources of which our economies depend on, such as salmon, rely too on these forage fish. Additionally, our quality of life rests heavily on the backs of these shiny little creatures. As a resident of Sitka who intends to build my life here, I want to voice my support for Proposal 98 to reduce the harvest level and support a more ecosystem based approach to herring harvest in Sitka Sound. I also support adopting the more conservative Southeast regional model for the commercial industry and in general, all efforts to leave more herring in the water.



October 1, 2017

Alaska Board of Fisheries,

My name is Bill Menish and I have been a Sitka Sound sac roe permit holder and participant since before limited entry. I also am a permit holder in the Northern closed pound fishery and participated in that fishery for 8 years until it was shut down for lack of herring. In that fishery, I believe we, as fisherman, are responsible for the demise of the Northern closed pound fishery.

I am in full support of Proposal EF-F-17-06 to allow open pounding in the Sitka sac roe fishery as an alternative to seining. The open pounding has proven to work well in the past experimental fishery in 1998-1999 in Sitka Sound which I was involved in. It is truly a green fishery with no dead loss unlike closed pounding where I have seen a lot of dead loss. You cannot keep stuffing more and more herring into a small enclosure and not have major fatalities.

This proposal gives fisherman a chance to increase the value of the fishery and more herring would swim off, helping the biomass remain strong.

I urge the Board to act on this proposal to help maintain a healthy biomass. Killing less herring and yet increasing the value of the fishery is a very positive thing. Open pounding will achieve this.

Thank you.

Bill Menish



Submitted By
Blake LaPerriere
Submitted On
12/23/2017 2:38:01 PM
Affiliation

Phone
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dinghydude@gmail.com
Address
2212 sawmill creek road
sitka, Alaska 99835

Dear Board of Fisheries members,

I'm fifteen years old and I've lived on the water here in Sitka all my life. Just in my short lifetime, I have seen major changes in the Sitka Sound herring population.

When I was five or six, I remember netting herring out of the water right off of our beach. I remember whole seine fisheries that happened in our bay. I loved seeing the herring spawn. I loved seeing the thousands of gulls come in from the ocean and sea lions all over our bay. The whales would come in, and for a few days or weeks, our bay would seem to become the center of sea life.

This has changed. A lot. I don't remember what year it was that we had some decent spawn in our bay, but it has been at least five or six years since there was anything noticeable. When herring time comes each year it makes me sad. I really miss the herring and all the life they would bring with them.

As far as I am concerned this rapid decline in herring is from overfishing. The Tlingit managed this fishery for thousands of years and they did it sustainably. So can we.

Up and down the Pacific coast countless fisheries have been ruined by poor management and I am not ready to see the herring disappear. We have the last intact herring fishery here in Sitka and I'm not ready for the hearing to become like all the other dead Pacific fisheries.

I support proposal 99, but to tell the truth, I would like to see the herring sac-row fishery entirely closed.

Thank you,

Blake LaPerriere.



Submitted By
Blossom J. Twitchell
Submitted On
12/14/2017 8:54:12 AM
Affiliation

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9077389671

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Address
715 Sawmill Creek RD
SITKA, Alaska 99835

My name is Blossom Twitchell, I have lived in Sitka for over twenty years. As a young Mt. Edgecumbe High School student, we would always anticipate the herring season. It meant being able to enjoy the community happenings while also enjoying the local subsistence harvest of the herring and its eggs. The herring season would be marked every year by the local sight of the waters being changed a milky white/green. As the years past, these areas grew smaller and smaller until they no longer showed up at the local beaches. Now, my children as well as other AK Native children do not have the memory of seeing the ocean outside of Sitka turning a milky white/green. The only sign they have of the herring season is the small planes taking off. The Sitka Tribe of Alaska would provide in years past herring eggs to the elders of Sitka, this years harvest was so horrible, there wasn't hardly enough to do such a thing and the quality of the eggs was a disgrace. The herring season has been changed, our subsistence way of life and community has changed. Our children will not have the memories that we hold, and that is within the last twenty years. I have had elders tell me how everything has changed, and they fear the herring is gone. They have memories of the whole coast erupting with herring. The current Mt. Edgecumbe Students no longer are able to send herring eggs home, which has disrupted the traditional trade of subsistence food between the Interior and the Coast.

The herring fishery needs to be protected so that we can ensure a traditional future for our children.



Submitted By
BoLars Matson
Submitted On
12/26/2017 8:33:02 PM
Affiliation

Sport fishing and commercial fishing can coexist on the Tsiu river. But certain safe guards need to be maintained. It is extremely difficult to sport fish below the marker during an opener, which makes it essential that the historic 1/2 mile closed to commercial fishing be maintained. Given stream dynamics there may not be holding water to fish within the proposed, reduced area above the marker.

Thank you for your consideration.



To Alaska Board of Fisheries

From Brad Sobjack

FV, DETERMINED

South east Alaska Dungeness Fisherman

I Support proposal # 235 deleting the current management plan with a Fixed season date
June 15th Thru Aug 15th summer
oct 1 Thru NOV. 30th winter

I do not Support Proposal # 54; SAAC 32.125
to reduce From 300 to 240 pots This is
not a solution to the sea otter problem
This would be a hardship To Fisherman -

I do not Support proposal # 55
Allowing up to 400 pots This seems silly

I do not support Proposal # 56
Closing waters of Twelve mile arm
to commercial Fishing for Dungeness - We have
Lost enough ground already.
Please consider my comments.
Thank You Brad Sobjack



Submitted By
Brian Zwick
Submitted On
12/27/2017 6:30:32 PM
Affiliation
Gillnet

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907-821-0586

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Akdiver69@yahoo.com

Address
801 Peterson st.
Ketchikan , Alaska 99901

I oppose proposition's 79 80 81 82 83 84 I feel they would create hardships for all involved in shrimp

As I also strongly oppose 153 148 140 145 if the seine gets Anita and naket it will totally take sways Gillnet income for many who only fish these areas and would be devastating to the SE Gillnet fleet.



Dear Alaska Board of Fisheries Members,

I'm submitting this comment now because the August 2017 Southeast Alaska Chinook salmon and non-pelagic rockfish closures occurred after the proposal deadline and I will be unable to comment in person at the January meeting.

For the reasons stated below, would you please consider for Alaska resident anglers, changing the harvest category from sport to personal use for Chinook salmon and rockfish. And in addition to this reclassification, for Alaska residents only, would you please consider a minimum Chinook daily bag limit of one fish regardless of the Abundance Index - with the flexibility to increase the daily bag limit as the abundance increases - and to end the rockfish closures.

This request for change is based on the fact there is no data to indicate the harvest by Alaska resident anglers has caused the decline, or is a significant reason for the decline, of Chinook salmon and non-pelagic rockfish populations. If Alaska fisheries management is based on science, then I see no reason to close these fisheries to Alaska residents. By changing the category to personal use, Alaskans would be able to continue fishing when the groups that harvest the vast majority of these species (non-resident charter anglers and the commercial fishing fleet) is limited due to conservation concerns.

The personal use designation would allow Alaskans to harvest small numbers Chinook salmon and rockfish when the populations can't sustain heavy harvests by the other groups, and it is currently used to prevent non-residents from harvesting king crab.

Thanks for your consideration,

Bruce White
Sitka, Alaska



Submitted By
Cale LaDuke
Submitted On
12/28/2017 11:54:48 PM
Affiliation
FV Sammi

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Address
PO 1216
Sitka, Alaska 99835

I am a commercial fisherman of halibut, blackcod, and multiple species of salmon, with 20 years of fishing experience in Alaska, and I am concerned for our resources. I would like to ask the Board of Fish to make the most conservative allocations possible in their herring decisions, due to my concerns that herring are close to the foundation of the food chain. King salmon and halibut, among other species which eat herring, have been in decline. There is a theory called the basin effect (where high catch rates can continue right up till species collapse, because the best habitat continues to experience high biomass as fish from peripheral areas replace fish removed by the fishery, until there are none left), that may be happening now. As stewards of natural resources, it is in our best interest to leave more forage fish in the water.

Thanks,

Cale LaDuke



Caven Pfeiffer
Commercial Troller
236 Observatory Street
Sitka, Ak
907-518-1945

Dear Members of the Board of Fish,

This letter is in regards to the Unuk River and Chilkat River action plans for 2018. I am in my tenth season as a commercial troller and I am the primary bread winner for my family. For the sake of our southeast Alaskan communities, record low escapements on the Chilkat, King Salmon and Unuk Rivers must be remedied.

The Department of Fish and Game has produced action plans that are very broad based and not specific to the individual stocks of concern.

For example:

- Closing the entire southeast winter troll fishery a month and a half early.
- Reducing the Spring Troll Fishery to THAs, waters in close proximity to hatchery facilities or release sites.
- A region-wide troll closure May 29- June 14.

Please allow fishermen to fish where stocks of concern are not abundant.

To achieve this:

- Concentrate closures in the times/areas where stocks of concern comprise the highest percentage of the catch and to increase fishing effort in times/areas where they make up the lowest percentage of the catch.
- The BoF should set a maximum allowable Harvest Rate for each gear group.
- Use data from previous years to tailor the next year's management.

I have considered the proposed loss of fishing time under the department's action plans:

- Averaging the past three years, I have grossed \$82,000 during the winter, spring and summer troll fishies combined.
- From April 1 to July 1, I have made \$19,500 which is 24 percent of my gross.
- Broad based closures during the winter and spring would end the profitability of my fishing business.

Thank you for considering my concerns and recommendations.



Sincerely,
Caven Pfeiffer



Submitted By
Chandler O'Connell
Submitted On
12/28/2017 7:57:13 PM
Affiliation

Phone
9077380357
Email
cmoconn@gmail.com
Address
608 Etolin Street
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I am writing to express my support for Proposal 98 and Proposal 99, either of which would cap the harvest of herring at a maximum exploitation rate of 10 percent. I would be happy to see the Board of Fisheries institute whichever of these two proposals you deem most appropriate.

I am a born and raised Sitkan and a member of a fishing family. I remember as a child going to collect herring egg covered seaweed, layered knee deep on the beaches along Sitka's road system, to use in the garden. Its been years and years since I've seen spawn like that in town. Over those years, I've also heard more and more from Sitka's elders about how the herring and the spawn are different than they used to be.

I am deeply concerned about the health of the ecosystem, the resiliency of my community, the rights of tlingit peoples to maintain their cultural practices and resources, and the future of subsistence and commercial fisheries. My concerns are further compounded by the rapidly changing ocean and climate conditions that are clear to see (ocean acidification, changing temperatures, algae blooms, the sudden appearance of Market Squid), but with implications that are hard to understand.

The herring population in Sitka Sound lies at the crux of all of these concerns. As a forage fish at the bottom of the food chain, I imagine herring as the foundation of the "Jenga Game" that is our ecosystem and multi-layered economy, including subsistence, commercial fisheries and tourism. Its a complicated system experiencing pressure from human exploitation, habitat disruption, and climate change. If herring gets knocked out, everything else will tumble down too. Fish, marine mammals, birds; they're all dependent on the herring.

According to Traditional Ecological Knowledge, the current Sitka Sound herring population is well below historical baselines, prior to reduction fisheries. At the Sitka ADF&G Local Advisory Committee meetings considering herring proposals this year, there was strong public outcry for more conservation and sincere concerns expressed about the health of the herring population. ADF&G's forecast estimate for the 2018 herring biomass is 55,637 tons, a number considerably smaller than last year. In 2017, the ADF&G model estimates that only 63,270 tons of the forecasted 73,245 tons showed up on the spawning grounds. If that percentage difference occurs again in 2018, only 48,060 tons would return. It is also notable that the 2018 herring biomass estimate is comprised of 47% age-4 fish, which are typically smaller than the fish size desired by the sac roe industry. Taken together, these points lead me to believe that Sitka's herring are vulnerable and potentially at risk.

All of this should e considered in the context that Alaska's other herring fisheries have already been closed and that herring stocks in regions have collapsed. The Sitka Sound herring population is an anomaly that should be treasured.

Given the unique and irreplaceable role that herring play as a keystone species, I believe that greater caution is called for in the management of the sac roe herring fishery. There is precedent for the Board of Fisheries to vote for conservation in this matter. Various ADF&G fisheries in Southeast Alaska, such as sablefish, lingcod and rockfish, utilize conservative harvest rates because they are potentially vulnerable. Other herring fisheries on the west coast currently use a maximum harvest rate of 10%. Action should be taken to conserve this valuable resource before it's too late.

For the ecological, cultural and long-term economic wellbeing of Sitka, I ask that the Board of Fisheries support Proposal 98 or Proposal 99.

Thank you for taking the time to consider my comments.

Sincerely,

Chandler O'Connell



Submitted By
Chandler O'Connell
Submitted On
12/28/2017 11:32:55 PM
Affiliation

Phone
9077380357
Email
cmoconn@gmail.com
Address
608 Etolin Street
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I am writing to express my opposition to Proposal 104, which would repeal the closed waters in the District 13 commercial herring fishery around Middle Island. This area is heavily used by subsistence harvesters in Sitka and is a protected area that I believe has worked well since its establishment by the Board of Fisheries in 2012.

I am deeply invested in the state of Sitka's natural resources. As a member of a commercial fishing family, I have been lucky to benefit from the bountiful waters of Southeast Alaska and to have had the opportunity to learn about fisheries management. I believe that management should prioritize the health of the ecosystem, cultural uses, subsistence uses and commercial uses, in that order. Over the past 10 years, the minimum amount of herring spawn reasonably necessary for subsistence has not been met multiple times. In addition, many members of the Tlingit community have been speaking out for decades against overfishing of herring (based on Traditional Ecological Knowledge) and have called for conservation in order to sustain their culture and the ecosystem on which we all depend. Given this, and given my belief that herring are increasingly vulnerable due to climate change, shifts in predation, habitat pressures, and extraction by the sac roe fishery, I support maintaining or expanding protections that allow for successful subsistence harvesting.

I believe that Proposal 104 would hurt subsistence users and could have unintended negative consequences on the health of the herring population overall, by rolling back conservation measures (maintaining an area with less disruption of spawning activities seems like a positive move for conservation!). Please vote no on Proposal 104.

Sincerely,

Chandler O'Connell



Submitted By
Chandler O'Connell
Submitted On
12/28/2017 11:40:42 PM
Affiliation

Phone
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Address
608 Etolin Street
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I am writing to express my support for Proposals 105 & 106.

I am concerned about the health of herring stocks in Sitka Sound, and I have heard compelling commentary from a diverse cross section of Sitka's subsistence harvesters that it has been challenging to meet the need for herring eggs in recent years, despite putting more effort into subsistence activities. Therefore, I am in support of efforts to improve subsistence outcomes and conserve the adult herring population.

Thank you for taking the time to consider this comment.

Best,

Chandler



Submitted By
Chandler O'Connell
Submitted On
12/28/2017 6:46:20 PM
Affiliation

Phone
9077380357
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cmoconn@gmail.com
Address
608 Etolin Street
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I'm writing to express my strong opposition to Proposal 94, which would reduce the amount of herring spawn reasonably necessary for subsistence in Sitka Sound to 60,000 pounds. This proposal is based on faulty assumptions and disregards the critical importance of the subsistence herring egg harvest to the Tlingit culture, the food system and the economy (food is money), in Sitka and across the state.

The Southeast Herring Conservation Alliance (SHCA) bases their proposal on ADF&G Subsistence Division information showing decreased participation in herring egg branch harvest. However, that participation data is based on the number of harvesters, and not the number of trees set, arguably a more appropriate measure of effort. For instance, in recent years, much of the subsistence herring harvest in Sitka Sound has been conducted by "super harvesters" (versus many small scale harvesters) who set many trees, and utilize the entire opening to try and meet the subsistence needs of the community. It's also worth noting that, according to public testimony by Jeff Feldpausch, the Natural Resource Director for the Sitka Tribe of Alaska (STA), in 2017 STA exerted more effort (time, fuel, trees set) to harvest herring spawn than ever before, but was still unable to meet their needs.

In addition, SHCA bases their proposal on the claim that "the SHCA egg harvest program has demonstrated that a harvest of 30,000 to 40,000 pounds saturates the gifting of eggs in Sitka. Additional eggs are certainly harvested by individuals, whom we have also monitored, but there is insufficient effort to harvest more than 50,000 pounds." SHCA is not a monitoring agency, it is a nonprofit that works for the benefit of southeast Alaska sac roe herring seine permit holders. I don't believe that this claim is supported by evidence. Indeed, at the Sitka's Local ADF&G Advisory Committee meeting on herring proposals, I heard many compelling public testimonies on the challenges subsistence harvesters are facing in meeting their needs, that directly contradict SHCA's supposition.

I trust that the Board of Fish will respect the important role of the subsistence herring egg harvest in Sitka's cultural and nutritional way of life, and will vote against Proposal 94.

Thank you for considering this comment.

Sincerely,

Chandler O'Connell



Submitted By
Charles Allen Pool
Submitted On
12/27/2017 1:22:19 PM
Affiliation

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273 San Bernabe Drive
Monterey, California 9390-6123

Dear Sir/Madam:

Over the years, I made 14 trips to fish the Tsiu River. It was always a delight and great fun. On several of those trips, I shared the river with commercial fishermen. That was OK, I understood their need to make a living. However, some of them, many, were outright rude and dangerous showing no concern for life or limb of other persons as they deliberately raced their boats between sport fishermen and schools of fish in their efforts to herd schools of fish into their nets.

There was and always will be a need for reasonable regulations and enforcement of the regulations enacted for the mutual benefit of commercial and sport fishermen. I urge you to consider this in your coming deliberations of future regulations relative to both commercial and sport fishing on the Tsiu River.

Respectfully,

C. Allen Pool



Submitted By
Charles D Schroth
Submitted On
12/28/2017 1:48:47 PM
Affiliation
Southeast Aerial Survey, LLC

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PO BOX 193
Gustavus, Alaska 99826

Thank you for the opportunity to comment on proposal 159, proposed by John M. Johanson. My name is Charles Schroth. I have been a resident of Southeast Alaska since 1970. I have been a commercial pilot in Southeast Alaska for nearly 20 years, and involved in Alaskas Southeastern fisheries (directly and indirectly) most of my adult life. For the past 5 years I have been a fish spotter for a fleet of seiners that sell their fish solely to Ocean Beauty Seafoods, LLC, a large company that has mutple commercial fleets and multiple commercial processing plants in both Alaska and Washington State.

I am in agreement with the current regulation 5AAC33.398 that states **"In the Southeastern Alaska Area, during an open commercial salmon fishing period, a person may not use an [UNMANNED] aircraft to locate salmon for the commercial taking of salmon or to direct commercial fishing operations."** These unmanned types of aircraft are typically operated by untrained personnel and have proven to ba a hazard to aircraft. They do not have to follow the same training, licencing, and FAA regualtions that manned aircraft are required to follow.

I am in disagreement of proposal 159 to **"Prohibit the use of *all* aircraft used to locate salmon or direct commercial fishing operations during open commercial salmon fishing periods in the Southeastern Alaska Area."**

The use of manned aircraft is of great benefit to the fisheries in Southeast Alaska, and has been for nearly 100 years. The use of the airplane has a historical precedent in Alaska. Manned aircraft have been used to support fisheries in Southeast Alaska from patrolling fishtraps to supplying boats and canneries, as well as fish spotting.

As a fish spotter, it is highly beneficial to survey all areas surrounding the open areas to get a better understanding about the availability of the fish, the run strength, and direction of travel. This information is passed onto the Ocean Beauty Seafoods management and the fishermen. This knowledge allows them to make better decisions and to seek out more heavily populated fishing areas that are open. This reduces their overall costs and improves communications, safety and efficiency in the fleet.

The fishpotting community in Southeast, although small in numbers, is a very proffessional group dedicated to the legal harvesting of salmon. I have not witnessed any group of fishermen in the cowboy setting of using jetski's to "herd the fish" as stated in this proposal during any opening. I believe the enforcement department of the fisheries is effective and adequate. I personally have never witnessed or taken part in any illegal activities.

I believe there can be another way to manage the perceived problem stated in the proposal. If such activities are indeed happening, banning the use of aircraft would not prevent the illegal use of jetski's as stated.

Charles D Schroth

Southeast Aerial Survey, LLC



Charles P. Fogle

F/V invincible

F/V Incentive

5722 Campbell lake road

Anacortes WA. 98221

Alaska Board Of Fisheries
PO Box 115526
Juneau, AK. 99811

RE: Comments on Herring proposals for SE Finfish Meeting Jan. 11- Jan 22 2018

Mr. Chairman and Board Members,

I am writing to express my strong Opposition to proposals 95, 96, 98, 99, 100, 105, and 106. I would like to strongly support Proposals 94 and 104.

I have been participating in the Sitka Sac Row fishery for 18 years as a seiner and also having my tender participate every year as well. This fishery is a huge part of my yearly income and would be devastating to my family and crews if there were any unnecessary changes. Sitka is a proven long term sustainable fishery and has proven to support the commercial and the subsistence fisheries as well as the natural competitors for the fish. The Fishery supports the community, state and Alaskan families as well as nonresident families as well.

There is absolutely no scientific support or any other reason to support proposals 95, 96, 98, 99, 100, 105, and 106. These proposals are all presented by the STA and have no support by the dept. of F & G or any other scientific organization that they use to manage the health of the long standing strength of the Sitka sound Herring fishery.

Proposals 94 are a request to change the ANS to actual documented need that has been harvested. Please support this proposal.

Proposal 104 is a request to give the dept. a tool that is needed at times to harvest the quota. The Core Area established in 2012 is not necessary for the subsistence harvest of eggs as shown by the Southeast Herring Conservation Alliance information. However on rare occasions the area closure has limited the Dept. to manage for maximum sustainable yield. It is unnecessary to have the closed water area established in 2012.

Thank you for your time on this matter

Charles P. Fogle
907-230-7977



Charles W. Treinen

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December 26, 2017

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
<http://www.boards.adfg.state.ak.us/>

RE: Comments on herring proposals for SE Finfish Meeting--Jan. 11-Jan. 22, 2018

Mr. Chairman and Board Members,

I am writing to express my:

Opposition to proposals 95, 96, 98, 99, 100, 105, and 106

Support for proposals 94 and 104.

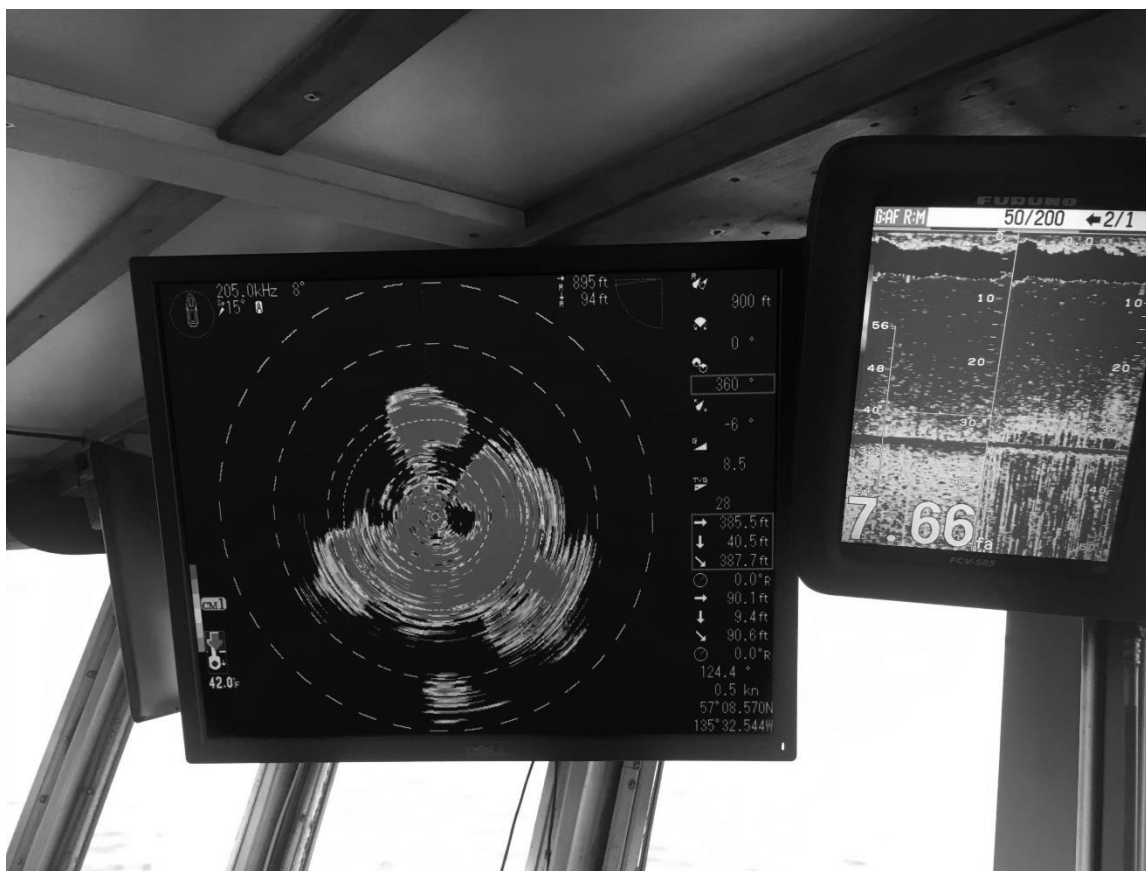
As a Southeast Alaska sac roe seine permit holder for over twenty years, I have made large investments in the Sitka Sound sac roe fishery. It is a significant part of my fishing business operations that provides income for me, my family and crew as well as for tenders, related businesses, processing and transportation that helps support Sitka, other SE fishing communities and the State. I also have sac roe seine permits for Prince William Sound, Kodiak, and Cook Inlet and participate in the open-to-entry Togiak fishery.

Long-term closures of PWS and Cook Inlet, along with Lynn Canal and West Behm Canal here in Southeast Alaska are a testament to the fact that all of Alaska's herring fisheries are conservatively managed and that when stocks are deemed insufficiently abundant, no commercial fishery is allowed. When stocks decline or increase as they so often do for unknown reasons, the commercial fishery is adjusted to reflect abundance in a very conservative and precautionary way. The Sitka sac roe fishery is clearly the most intensively managed herring fishery in the state and has a tried and true management plan with ample protections based on valid management science and stock assessment data. However, due to misunderstanding and political pressures, the fishery has been subject to misrepresentation and has often been unnecessarily restricted.

Herring seining in general requires specialized electronics, equipment and organization to be successful. In Sitka Sound, sophisticated electronics and coordinated efforts of the fleet and Department are especially important in determining the size and

characteristics of the herring biomass. Aerial surveys and other visual observations can provide some information but hydro acoustic detection of herring schools in Sitka Sound is critical because of relatively deeper water and the fact that the herring spawn typically occurs just after a plankton bloom that hampers visibility. It is unlikely that any of the local critics of the fishery have the equipment, organization, finances or incentive to make accurate judgements about the herring stock size or management in Sitka Sound. Nonetheless, every board of Fish cycle year, the same type of proposals designed to compromise the fishery are seen without any valid new information supporting those contentions.

The following print shows a sonar and sounder photo taken just prior to one of last year's openings and shows a massive school of herring that takes up a good portion of a 360-degree sweep of a 900-foot radius scanning sonar screen. The sounder shows solid fish from 7.66 fathoms to near the bottom at 35 fathoms. A 200 fathom (1200') long seine set in a circle outward from the center of the sonar picture could not reach the edge of this school.



This school alone probably could have filled the entire 2017 GHF of nearly 14 thousand tons if it even could have been caught! Without a fleet of herring seiners, the Department's aerial and hydro-acoustic surveys, the extent of this biomass and other



schools of herring would have been unseen. Significantly, the area where that picture was taken was not included by the Department in the subsequent opening.

During my tenure in the fishery (this will be the sixth Board cycle meeting for me), one constant is the effort of the Sitka Tribe of Alaska (STA) and their associates to limit fishing area, time and harvest or eliminate the fishery altogether based on anecdotal information and emotional appeals that are inconsistent with scientifically valid methods, data, analysis and rational decision-making processes. STA also consistently denies the validity of Department information and rejects measures to accurately account for their own activities. Nonetheless, the Board has chosen to respond to STA concerns with various changes to the management plan such as raising the threshold, increasing the amount necessary for subsistence (ANS) and area closures. It seems to me that the issues of concern are at best only marginally related to proposals addressed by the board to the point and that nothing short of total elimination of the fishery will satisfy the complainants. However, even with no commercial fishery, it is unlikely that the subsistence harvest will reach the ANS goal given its artificially inflated amount and unless there is a greater level of participation and demand for the product. At the lower end of the present 136 thousand-pound ANS, each of the 9 thousand Sitka residents would have over 15 pounds for consumption. While a considerable amount may be exported and shipped to other communities around Alaska--at a considerable cost, it seems unrealistic to believe that there is a demand for such a large amount without a commercial incentive for harvesters.

Please support Proposal 94—Change ANS to reflect actual harvest.

The present ANS of 136 to 237 thousand pounds is based on numbers that are based on estimated weights derived from a self-administered STA survey and have been shown to be highly inaccurate. Nonetheless, under-achievement of ANS is used as a justification for restricting the commercial fishery by STA. The Southeast Herring Conservation Alliance (SHCA) harvest data indicates that a 60 to 120 thousand-pound ANS would be more than adequate to cover local demand and would allow for 6.75 pounds per Sitka resident at the minimum. If more is needed, eat away! The high end is essentially meaningless since there is no real limit on the harvest outside of the effort it takes to set branches in an area where herring are spawning and to gather the branches with eggs later. The SHCA subsistence harvest program has shown that the demand for eggs appears to be saturated at less than the proposed 60 thousand-pound lower end ANS. Given this year's estimated 55,637-ton mature biomass and a conservative estimate of 10% roe, a 30-ton subsistence harvest that includes the weight of branches represents less than half a percent of the overall spawn.

Please reject Proposals 95 and 96—Closure of 15-B, C and 11-A

The proposer suggests that the areas noted should be closed to commercial fishing because they have been closed to commercial fishing since 1982. It does not appear that there is any identifiable problem being addressed. The Department closed the fisheries in



question due to a decline in stocks and has the tools to do so again if stocks rebound and subsequently decline again.

Please reject Proposal 98—Lower harvest rate to 10%

The proposer suggests that reducing the harvest rate is needed in “the rapidly changing ecosystem...” to provide for a “robust herring population and sustainable commercial fishery”. Since it is not clear what the affects of a rapid ecosystem change might be, it is not clear what need there is to change a responsive management plan that has a proven record of sustaining the herring stock at a level that allows for a commercial fishery, subsistence harvest and supports the growing marine mammal population. Setting a precedent for altering management plans based on potential unknown ecologic changes would be a call for altering management plans for all species.

Herring can be an important prey species for other valuable commercial species at some point in a life cycle, but they are also competitors or predators at other stages. The herring population remains well above the established 25,000-ton threshold and has stayed above twice the threshold in all but one year since 2003 and above threshold since 1995 under the 10-20% exploitation rate. A maximum 20% exploitation rate is a well-accepted standard used in herring fishery management. While alarm over rapid environmental change is a valid concern, curtailing the fishery for fear of the unknown is not a reasonable response and compromises economic options for all.

From a market standpoint, a harvest rate that approaches 0% is unsustainable and unnecessarily reduces economic opportunity for all stakeholders, communities and the State.

Please reject Proposal 99—Reduce the harvest rate to 10%

This proposal by the Sitka Tribe of Alaska (STA) has been presented and subsequently rejected by previous Boards. Little or no new information has been presented in the proposal and while STA may believe the fishery is disrupting spawning patterns, no evidence has been presented other than the contrived argument about not meeting the over-inflated ANS. SHCA has demonstrated that subsistence needs can be met if the effort is made. The Department’s Subsistence Division has noted the declining subsistence harvest effort in the 2002-2010 Report 343.

Department data 1971 to present has shown that a harvest rate of up to 20% has maintained a herring stock above the 25,000-ton threshold for over 20 years. Realizing that stocks of pelagic schooling fish around the world are subject to wild population fluctuation due to environmental conditions, it is significant to note that, while the 20-year average Sitka Sound forecast biomass from 1978 to 1997 was 32.5 thousand tons, the recent twenty-year average from 1998 to 2017 was 66 thousand tons. Stock assessments from the Department clearly demonstrate that the present exploitation formula has allowed for long-term growth in the stock. This proposal unnecessarily



compromises economic and sustainable opportunity for no realistic or demonstrable benefit to the proposer.

Please reject the Proposal 100—Juneau area herring stocks, 11-A, 15-B&C.

Since these areas have been closed for 35 years--as recognized by the proposer, it seems unnecessary to take any action on this issue. The Department recognizes this stock as being subject to a conservative sliding scale harvest level with a 5,000-ton threshold. This stock is not historically like the Sitka stock and rightfully should be treated separately.

Please support Proposal 104—Repeal closed waters in District 13.

The ‘Core Area’ established in 2012 is not necessary for the subsistence harvest of eggs as shown by Southeast Herring Conservation Alliance (SHCA) information. However, on rare occasions the area closure has limited the ability of the Department to manage for maximum sustainable yield. Now that a 2015 Federal Subsistence Board has shut down federal waters around Makhnati Island--despite recommendations against by Office of Subsistence Management biologists and the State of Alaska--it is unnecessary to have the closed waters established by the Board of Fish in 2012.

Please reject Proposals 105 and 106—Expand closed areas in Sitka Sound

These proposals are the usual attempts of STA to restrict the commercial sac roe fishery with patently false justification. As previously noted and widely recognized, the overinflated ANS is being used to compromise the sac roe fleet for no benefit to subsistence users. Additional closures will not benefit subsistence harvesters for the same reasons that the Core Area closure of 2012 didn’t increase the subsequent subsistence harvests. Due to declining effort and saturated demand, it is unlikely that any area restrictions in the sac roe harvest will affect the subsistence harvest.

Please reject Proposal 107—Establish a spawn on kelp fishery in Sections 13-A and B.

This proposal is an attempt to bring a new user group into the Sitka Sound herring fishery, namely the 110 permit holders in the Northern Southeast Roe on Kelp Pound fishery (L21A). While it may appear to be a way to more fully use the available stocks, the introduction of alternate gear will create conflicts. The proposal asks to be able to open a fishery in areas 13- A & B of Sitka Sound if there is a 1500-ton unharvested amount in the sac roe seine fishery.

Presumably, they are asking for a closed pound fishery which has the potential to compromise the Sitka Sound stock due to disease problems related to crowding fish into



pens. It is also problematic to conduct a pound fishery after the main spawning event has occurred. Presently, the L21A permit holders have other areas with an allocation, however, it seems that those areas are having difficulty maintaining fishable stocks under the roe on kelp management regime. This proposal would be difficult to enact and create future gear conflicts where there presently are none.

Sincerely,

Charles W 'Chip' Treinen



To: Board of Fish Members

From: Charlie Piercy

Bachelor of Science in Chemical Engineering 1976

Board Chairman of the Seafood Producers Cooperative

Past president of southern Southeast Regional Aquaculture
Association

Residing at 17491 North Tongass Highway Ketchikan Alaska (West
Behm Canal 60 Miles from the Unik River)

Phone any time 907-247-8242

Re: Unuk River King Salmon Stock Status and Action Plan, 2018.

Outlined below are 5 factors that need to be included in the Unik River action plan. Without the consideration of these factors, I believe that the Unik River system is either approaching or has reached the threshold in which recovery to its escapement goals is nearly impossible under today's current management practices.

Factor 1) The most important factor in the management of any production system is to have good data collection and to make real time corrections. From an engineering perspective, the management of Kings (large fish) returning to the Unik River estuary is similar to many of the control systems used in the industries of the world. The escapement goal of 1,800 to 3,600 large fish is the amount of Kings needed to arrive at the Unik River (the set point). To achieve this goal it is most important to have timely and accurate data. The Sport Fish Department of ADF&G is requiring the lodge and charter industry to make weekly landing reports. This data is not being used to manage the catch rate in season because, why? In order to control the flow of "King Salmon " to the Unik River to meet escapement goal, you must have good data collection on their movements and real-time in season management. This run peaks around statical week 23 or 24 depending on where Sunday falls on the annual calendar. 98% of the run occurs within 3 weeks on either side of this statical week.

From page 5 of the Unik River King Salmon Stock Status and Action Plan, 2018, it reads: "Harvest rates in the Ketchikan area sport fishery on the Unik



stock of king salmon were 1%, 6% and 0% in 2015, 2016 and 2017, respectively.” My conclusion from these numbers, especially the 0% in 2017, when no commercial troll fishery occurred during the Unik River migration period is one or more of the following:

A) Data Collection was poor to non existent.

B) There were no coded wire tags (CWT) to collect. This means that the CWT samples from at least 3 brood years was nonexistent by the time the Unik Kings migrated through the Ketchikan sport fishing area.

C) Sport fisherman and sport fishing technology has improved in the past seven years to the extent that they can selectively prevent CWTed Unik River stock from biting. Historically, from Deer Mountain Hatchery, there have been CWTs landed in the sport fishery. Deer Mountain Hatchery used Unik River Kings as brood stock, until it was unable to operate financially.

This quoted statement from the draft plan above, is real hard for me to understand or believe that professional managers and scientists would actually think this is good science, yet alone publish it.

A logical solution to this factor is to treat all user groups the same in regards to data collection, reporting, and control. Weekly electronic landing reports of all users should be required. This is already being done in the commercial fishing sectors. In today’s electronic age this is not too much to ask of any user. The follow up of good data collection is to actually use it in a timely manner. It is also a necessity for ADF&G to make this data easy accessible to the public in a timely manner. In season management is required to make escapement goal in times when conservation is necessary, but also in times of abundance to obtain the statehood goal of maximum sustained yield.

Factor 2) Southern Southeast Regional Aquaculture Association (SSRAA) historically has released King Salmon in Neets Bay, approximately 40 Miles from the Unik River estuary. These annual releases currently produce around 15,000 returning adults, the actual number depends upon the survival of the individual year chases that combine, to make up the annual return. Why this factor needs considering is because these fish are reared from funds generated by taxes that are applied to the landings made by commercial Salmon fisherman (3% of ex-vessel value). The only contribution to the expenses in the rearing and release of King Salmon in SSRAA’s region in over 6 years has been the 3% enhancement tax. Historically a small amount of dollars were contributed by the



State of Alaska. This funding no longer exists: consequently SSRAA is under no obligation to produce King Salmon. In my opinion SSRAA will only continue to produce Kings as long as the economics make good business sense to the commercial fishermen. At SSRAA's December 2017 board meeting, the Board of Directors decided to move 58% (about 9,000 returning adults) of the Neets Bay release to other locations. Why this is important to the Unik River escapement is that in 2021 when the majority of this year's (2018 release) returns there will be a significant decrease in the availability of Kings Salmon in the corridors leading to the Unik River.

Factor 3) Using the current management practices of annual management of sport fishing (charter bookings and lodge reservations, which contribute over 90% of the sport landings,) it will be impossible to control the sport harvest. Due to the 3 year Board of Fish cycle, it is imperative that the booking issue be resolved. Last year we had over one million cruise vessel passengers arrive at the Ketchikan docks. The cruise vessel industry is still wanting to grow the number of visitors and has asked the Port of Ketchikan to accommodate larger vessels. What is uncommon knowledge outside of the Ketchikan area is that the majority of the charters are booked aboard the cruise vessel. This method of booking avoids the city of Ketchikan sales tax and also causes about 50% of the generated revenue from bookings to never see the business cycle in Alaska. Large industry is controlling the extraction of a public resource by a provision made by a previous Board of Fish that lets management cave to political will of big corporations. They are not taking any responsibility for the limited resource available to them, but are wanting to grow their own wealth on the back of existing users. This state of affairs reminds me of why the Territory of Alaska pursued statehood: that was to wrestle control over its Fisheries resource from the Federal Government, who were managing it for the will of big companies. The solution again is to have good data collection and real time management control. It is also past time to treat the charter and lodge industry for the commercial enterprise it is. It is unfair and unrealistic for these professional fishermen to hide behinds the local residents' skirts. The captains who operate the charter vessels also need to take ownership and stand up to the reality of the situation that they are operating under. The Board of Fish should facilitate the recognition of a separate user group and its regulation thereof.



Factor 4) The nonhuman predators. I read the other day in one of the trade magazines that one pod of adult killer whales eat 64,000 pounds of King Salmon in Puget Sound. This is equivalent to about 3000 large Kings . If this is only 15% of this is true, the two pods of killer whales now living in the Ketchikan area from mid May through July would eat up the entire run forecast of the Unik River. Don't forget that there are also Sea Lions and Seals that prefer to dine on Kings. In today's society there is no willingness for predator control. We as managers must insert this factor in the harvest equation. I have witnessed, in the 40 years that I have lived in the Ketchikan area, the growth of small release by SSRAA to where it is currently releasing enough Kings to produce an annual average return of 30,000 Kings. This growth of King Salmon has precipitated growth of at least two pods of killer whales. It has also facilitated the unregulated growth of an inflexible charter industry in the Ketchikan area.

Factor 5) There are four individual ADF&G managers that contributed to this report. Each has individual personalities and bios in regards to the management of King Salmon. Often when talking to one of the commercial fisheries managers it is difficult to extract from that manager what the sport fish manager position is or what conservation measures they are taking. There would be greater accountability if only one frontline ADF&G manager managed King Salmon (i.e. a species manager). It is also an issue of fairness and the perception thereof. One person who would know all things "King Salmon", not four individual managers looking out for their individual gear groups independent of one another.

Re: August 2017 Troll closure

I would like to take the opportunity that our state founders provided me with to provide input into the management of fisheries resource, this being the Board of Fish process.

Appropriately 3.3% of SPC's sales (\$1,400,000) comes from the August King Salmon opener. The 2017 August opener was closed by emergency order (E.O.) with the reasoning being the conservation of wild SEAK Kings. The Commissioner of ADF&G making the E.O. provided untimely and poorly thought out reasoning for this closure. This action cost the communities of S.E. Alaska in



excess of \$3.3 million. As far as I can determine, only 64 Kings were (saved) moved forward to the next season. As they are all immature fish, it is impossible to know if 100% of these “saved” Kings will be present in next year’s migration. A fisherman fishing a troll permit lost an average of \$4,000. Seafood Producers Cooperative has 570 owners, who will all take reductions in income because of reduced production volumes. This closure was made when the ADF&G Sportfish Department realized they might be over their quota. Actually sport fishers went over their quota by 44%. What actually occurred was a blatant reallocation of Treaty Kings and an unwillingness of the managers to open trolling when sportfishing would be closed. This occurred due to poor data collection and non existent timeliness in its data analysis, foregoing real time management. It would be real easy for me to look any sport fisherman in the eye and explained the why’s of management if I had the data in hand to back it up. ADF&G has been blessed in the past when the abundance of King Salmon allowed for sloppy management practices. The game changer arrived when all but one SE King Salmon system started having escapement problems. When “conservation” of a resource is to used, it is the responsibility of senior management to make sure all user groups are sharing in the economic losses that will occur due the conservation measures.

I stress again that you, the Board of Fish, adapt real time management and good data collection. For good data collection to occur, I believe the proposed management areas listed in the draft Unik River plan are inadequate. The area used for the management of the spring troll fisheries should also be used by the Sportfishing Department. I would predict that if the same criterion used for management and data collection of the Trollers was used by the sport fisherman, you would find that sport fishermen are catching over 50% of the Ketchikan area Kings.

Re: proposal #172

I wrote this proposal in the days before there were conservation issues . My hope is that this proposal will not be overshadowed by the short term conservation issues at hand. It it a long term adjustment that would only apply if no conservation techniques were necessary. There are other areas, (not only 101-29) that have a high abundance of hatchery King Salmon. These areas



should also be exempt from the spring Management ceilings during the period in which the hatchery Kings are in high abundance. Should you agree to use this proposal, the ex-vessel value of King Salmon will increase. The most valuable King Salmon per King Salmon counted towards the US Canada treaty cap is caught in the Spring troll fisheries. We should maximize the spring when SEAK wild stock conservation is not an issue. This should be implemented on a statistical areas by area basis.

Re:proposal #182

This proposal sets a defined start date for the August King Salmon troll fisheries. By doing this we accomplished several useful things.

1. We are letting the market know when Alaska Kings will be available.
2. It allows Trollers to make better business decisions in regards to where they need to be and when.
3. It requires ADF&G to process and report the July opening statistics in a timely manner. July numbers should be readily available 10 days before the opening date.

I selected a Tuesday opening day for personal reasons. It really doesn't matter if it is specific date (i.e. the 9th of August) or a day of the week (i.e. the second Tuesday).

Thank you for considering this lengthy opinion, I trust that you will give thought to my suggestions.

Charlie



December 28, 2017

To:

Alaska Dept of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526
Email: dfg.bof.comments@alaska.gov

From:

Chris Combs
503 Charteris St
Sitka, Alaska 99835

Members of the Board of Fisheries:

I hold a power troll permit and fish spring, summer and to a lesser degree during the winter troll open seasons. Salmon fishing, and especially king salmon fishing, makes up a substantial portion of my annual income.

I purchase a hunting/fishing/trapping license with a king salmon stamp every year and participate in each as fully as time permits. Some years I participate in the federal subsistence hunt as well.

Please accept my comments on many proposals before the Board of Fisheries this year.

Herring

In general, I am concerned about over harvesting herring. I believe that health of herring stocks directly affects the health of the ocean including the concerned wild Alaska salmon. I further believe that we are currently overfishing herring and that much greater research should be conducted. Please be conservative with herring harvest. Further, subsistence use should be held in much higher regard than commercial harvest.

Proposal 94: I OPPOSE this proposal to reduce the herring spawn ANS

Proposal 99: I support the AMENDED version of this proposal that was unanimously supported by the Sitka AC on November 29, 2017

Proposal 104: I OPPOSE proposal 104 to eliminate the Sitka herring sanctuary area.

Proposal 106: I SUPPORT this proposal to enlarge the sanctuary area.



Groundfish

Proposal 113: I SUPPORT this proposal

Proposal 116: I SUPPORT this proposal to limit the growth of the charter blackcod catch.

Proposal 123: I OPPOSE proposal 123 since this would further reduce lingcod bycatch in the salmon troll fishery in the Central Southeast Outside (CSEO) that does not reach its current allocation.

Proposal 124: I SUPPORT this proposal

Proposal 126: I OPPOSE this proposal.

Proposal 127: I support this proposal if it is written with a "NOT" which was intended "*Establish provisions for NOT reducing the resident pelagic rockfish bag limit in Central SE outside waters.*")

Proposal 127: I OPPOSE reducing the bag limit for resident sport fishermen for pelagic rockfish . Local resident fishing should be considered separately and "protected" from charter related concerns.



Salmon

In general, as a troller, I am concerned about poor Chilkat, Salmon, Unik action plans that do not attempt to allow full catch of treaty kings, allocation of enhanced salmon, the treaty king process/results. I address the action plans separately at the end of these comments.

Regarding allocation of enhanced salmon, troll catch continues to be well behind gillnet and seine catches with respect to allocation. I am especially concerned that NSRAA and the department do not sufficiently consider these continual shortages in troll hatchery fish catches.

It seems the original intents of the salmon treaty negotiation are not being respected, remembered or being considered recently. Please consider a full review of history of the treaty and make sure it is being applied appropriately today.

Proposals 132, 133 & 134: I OPPOSE these three interlinked proposals

Proposal 137: I SUPPORT this proposal to increase the *resident* sportfish possession limit of Chinook in years of high or very high abundance

Proposal 138: I SUPPORT this proposal to allow retention of other species when fishing with 2 rods for Chinook is allowed for residents.

Proposal 139: I OPPOSE this proposal to overturn the current Southeast Cove THA Management Plan

Proposals 140-143 & 145: COMMENT- the trollers are further behind allocation than seiners. Any allocation change should benefit the troller's allocation imbalance over seiners.

Proposal 144: I SUPPORT this proposal to provide additional troll opportunity to harvest of hatchery salmon at Deep Inlet. Trollers are behind gillnetters and seiners in allocation of these fish.

Proposal 146: I OPPOSE this proposal to exclude certain SE hatcheries from the allocation

Proposal 155: I OPPOSE this proposal to remove conservation measures to protect northern inside sockeye stocks.

Proposal 166: I OPPOSE proposal 166 to create a second seine index fishery about 9 miles north of an existing seine index fishery.

Proposal 173: I SUPPORT this proposal to delete the sunset clause in 5 AAC 29.114 Districts 12 & 14 Enhanced Chum Troll Fisheries Management Plan.

Proposal 174: I SUPPORT this proposal to create additional spring troll opportunity in a



manner that is consistent with the concerns for SE wild Chinook

Proposal 175: I SUPPORT, but suggest that it be AMENDED to read: (d)(3) When a spring king salmon troll fishery is closed, a person may not have king salmon aboard a salmon troll vessel while fishing for chum salmon **in an area closed to trolling for king salmon.**

Proposal 176: I SUPPORT this proposal keep the troll fleet from having to stop fishing for Crawfish hatchery chum during a closure intended to conserve/re-allocate coho.

Proposal 177: I SUPPORT this proposal to allow the department to identify areas where hatchery-produced coho can be targeted with troll gear when fishing on wild stocks is not permitted for allocation or conservation reasons.

Proposal 180: I SUPPORT this proposal to permit the spring troll fisheries to operate as originally envisioned, even in years when an abundance of non-Alaskan fish are present.

Proposal 181: It is not acceptable to lose treaty fish. The department should seek to maximize treaty fish while protecting wild Alaska kings. I am on the fence regarding this proposal. Would the current 70/30 provide more treaty kings to the trollers? I recognize that a 60/40 split would usually provide greater dollars to the fleet due to higher price per pound, BUT if the department closes the August period without good reason there is an immense loss to the fleet.

Proposal 184: I SUPPORT this proposal to give hand trollers more options.

Proposal 199: I SUPPORT this proposal to increase bag limits of abundant Juneau area Dolly Varden.

Proposal 204: I am OPPOSED to increasing Windfall Creek sockeye daily bag limit.



Regarding the 2018 Action plans to protect concerned wild salmon stocks:

I feel that the action plans reflects a poor response by the Department. As a troller, my greatest concerns with the action plan:

1. Status quo: I question the use of last year's troll related regulatory decisions as the Status Quo as an option. How can regulatory decisions that the department admits were not good, not made locally based on scientific information, reactive and not evenly applied among use groups? The charter fleet was allowed to fish in the spring while the troll fleet was closed down in the same areas...this makes no sense. Troll areas (Sitka for instance) were closed during times after these salmon are known to be already in the rivers. Further, some areas (like Sitka) have known low numbers of these concerned salmon in our catches. The department admitted that decisions were not left to local biologists. It is thought that large closures were made for international political reasons; I thought trollers gave up fish long ago in the treaty process to pre-pay for future conservation.
2. There is no mention of recommendation for the August troll opener. Perhaps it is implied that the August fishery would be closed as part of the "Status Quo". This is not acceptable.
3. There should be consideration of catching **ALL** of the treaty kings while still protecting the concerned Alaska wild kings.
4. Local troll closures should be considered over SE wide troll closures. I noticed that the gillnet and sport closures presented were local in nature; they were not SE wide closures. After all, the department has claimed that these concerned salmon are the best studied in all the world including their migration routes/where they are caught and when. It is known, by independent analysis, that at certain times and certain areas (Sitka area, for instance) have low or no concerned salmon in their catches based on the department's available creel data. The genetic database also suggests similar conclusions.



Chair Jensen and the Board of Fisheries

Statement by Chris Guggenbickler

Current President and gillnet representative on the SSRAA board of directors

Current chair and 26 year member of the Wrangell F&G Advisory Committee

Joint Regional Planning Team (JRPT) gillnet representative for SSRAA

Vice President United Southeast Alaska Gillnetters

As a board member of SSRAA and representative on the JRPT nothing is more frustrating than making decisions to increase opportunities for user groups to access enhanced fish while knowing wild value is being shifted without recognition in these opportunities. There seems to be a tendency to draw attention to one particular imbalance while choosing to ignore others that might not support one's position, all the while shifting value that is unaccounted for.

Proposal 146 would do this by not recognizing value realized to the fleets from non-regional associations. DIPAC would account for the largest portion of this value which contributes on average 52% of all the enhanced value the gillnet fleet receives. Some user groups would argue they are entitled to this value through the Enhanced Salmon Allocation Plan (ESAP) yet they pay nothing in the form of 3% Salmon Enhancement Tax (SET) toward DIPAC's budget, yet SET revenue received from DIPAC production contributes to NSRAA.

At the recent October workshop of the Board of Fish (BOF) a motion was passed to create a task force to look at allocation in Southeast by overall value. As we were pleased to see the BOF pass this proposal by its own merit, it was quickly reconsidered due largely to a letter submitted by SEAS and ATA (rc 47 of that workshop). The letter states there is a proposal where the idea of a task force to look at allocation by overall value could be properly vetted, this is that proposal. It was not USAG's intent to have a task force come up with any conclusions going into this BOF meeting, but as a charge coming from the broad discussions at this meeting.

In 1991 the Southeast Allocation Task Force (SATF) was created to look at this allocation by hatchery fish alone. 26 years later we find enhanced and wild fish intertwined in nearly every fishing opportunity afforded to the fleets. From pacific salmon treaty language to mixed stock fishery management enhanced value is taken into account with wild. Increased opportunities to access enhanced fish is given to each fleet, yet the incidental wild value accrued is not credited as fleet benefit. Furthermore, these opportunities can negatively affect another fleets wild



value. For example, in 2012 seine fisheries were first conducted in the Amalga Harbor THA to create seine access to DIPAC production surplus to DIPAC's cost recovery needs to access enhanced fish. In 2017 there was an incidental seine harvest of 103 chinook in this fishery while gillnet fleets were curtailed in districts 11 and 15 to conserve Chilkat and Taku stocks. Sport fisheries went through a large period of non-retention in this area to conserve these stocks as well. Of course, the value of these kings as well as the wild sockeye and pinks incidentally harvested were not counted towards the seine fleets enhanced allocation.

Previous BOF members have spoken to the many overlapping allocative management plans in SE but it appears all allocation is mainly addressed in four plans, 5AAC 33.363 (guidelines for allocating pink, chum and sockeye between net fisheries, 5AAC 33.364 (enhanced salmon allocation plan), 5AAC 29.065 (allocation of coho salmon), 5AAC 29.060 (allocation of king salmon). As we consider these allocation plans between gear groups in Southeast Alaska which allocation plan takes precedence? Is it the pink, chum and sockeye plan between the net groups? After all it was the first plan to be adopted as a baseline in 1989. Is it the king and coho plans both effective in 1998? Or is it the enhanced management plan adopted last in 1994? How does each plan effect the other?

This brings us to current times where one gear group or another will lobby the BOF to correct one particular imbalance with disregard for other imbalances. What is the bottom line? Does one fleet gain access to more of Alaska's resources at the expense of another fleets economic viability? Some would support this, but I would argue historic sharing percentages have been the only constant through BOF history. The only way I see to do this is to look at the overall value sharing between fleets. After all, if gear group representatives on the SATF knew the enhanced salmon allocation plan would consequently shift wild value over time it would not have been a consensus.

So, let's look at some examples of pros and cons of allocation as we have now, and allocating by overall value.

Proposal 177 submitted by ATA proposes to increase coho opportunity in areas of high hatchery abundance due to the fact they are below their allocation of enhanced salmon. In 2017 the hatchery component of cohoes caught in the troll fishery was 18%, undoubtedly the department would find areas of higher hatchery contribution than this, yet it is likely there would still be a sizable wild harvest which would be an increased value of wild salmon afforded by an enhanced opportunity.

If we look to 5AAC 29.065 Allocation of coho salmon we find trollers allocation to be 61%, yet in 2017 trollers harvested 79% of all cohoes. The seine fleet was short of their 19% allocation by 9% for a total loss of 244,500 cohoes. The gillnet fleet as well was over 50% below their



allocative range of coho salmon according to ADF&G data. This gillnet shortfall equates to over 190 thousand cohoes and is expected to continue into the future due to extensive summer coho production reductions at SSRAA in a gillnet district which previously contributed primarily to the gillnet fishery.

By these criteria alone one would expect a reduction of troll opportunity on all coho, yet these fish are of vital importance to the economic viability of the troll fleet, even more so now with current king salmon harvest restrictions. Do we say trollers should stop fishing on coho because they are above their allocation of coho when they have proven they can be effective harvesters of this species? I would prefer to apply this overage against their imbalance of enhanced fish through recognizing their overall value.

Certainly, finding a species beyond Chinook and coho the troll fleet can consistently harvest has been a challenging task, as we look at

Proposal 173 to remove the sunset from the Homeshore fishery that started as a Chinook opportunity and two board cycles ago was a recommendation by the RPT through an industry consensus to allow this as a new chum troll fishery. This fishery was approved again with a sunset last board cycle. In evaluating the data on this new enhanced troll opportunity since 2010 there have been 136,894 unmarked (assumed wild) chum salmon harvested in this fishery. I'm opposed to lifting the sunset on this fishery, only pointing out the shift of value in this enhanced opportunity that is not recognized currently. Previous to this fishery these chums were either caught by a net fleet or part of an escapement level to allow opportunity to the net fleets. In rc 47 of your fall workshop ATA and SEAS write these wild fish are fully allocated, yet we are continuing to allow increased incidental harvest opportunity to a fleet with no appreciable catch history for this species. How do we account for this shift of value? Is it fair to not recognize it? Do you remove the sunset and not look back? I would certainly hope not. Once again allocating on overall value would capture this value shift.

This is the problem with any new proposed fishery; what are the unintended consequences? What will the bycatch be in

Proposal 174? Certainly, we would like to allow troll access to new NSRAA production of enhanced chums to the troll fleet, but what else will they catch? I would hope the BOF would require the department to compile data to be re-visited at the next BOF meeting to study any potentially adverse effects of this fishery. Furthermore, it appears the area is rather large, this may be needed to find adequate return patterns and milling areas, but on first glance it appears the southern portion of this area should be vetted with shellfish representatives as there is a potential gear conflict with the Dungeness fishery in this area. Of course, this new enhanced fishery will undoubtedly shift some wild value.



Proposal 150 is another new release site aimed at the troll imbalance of enhanced fish. In 2017 there was a much larger than anticipated return of three year olds to Crawfish Inlet suggesting good survivals at this release site. This project was presented to the RPT as a troll preference release aimed at giving the troll fleet terminal access without displacing currently site dependent fleets such as in Deep Inlet. One of the main concerns by the department for this site's permitting is straying to a near chum indicator system at West Crawfish. It is likely the troll fleet will incidentally harvest some of these wild chums due to increased pressure from this new release. How shall we account for this shift of value as previously mentioned the troll fleet has no current catch history of these fish?

In discussions at the recent task force meetings it was presented this new release at Crawfish Inlet is expected to create a significant increase in enhanced value. This release coupled with other new NSRAA projects at SE Cove and Thomas Bay are anticipated to create an increase of 684,848 chum in 2018, 1,469,923 in 2019 and 2,177,859 new chum salmon by 2020. This new production alone has the potential to shift a gear group 10 percentage points in enhanced value without any other significant changes, such as

Proposal 143 that shifts a rotational schedule at Deep Inlet THA. The current sunseting schedule was set up between USAG and SEAS as a way to allow increased seine opportunity in July at a 1/1 ratio, switching to a 2/1 ratio in favor of gillnetting when opportunities on the coast and pink harvests created opportunities elsewhere for seine. This is the same agreement that will be sunseting at Anita Bay THA as well.

Currently there are 25 gillnet permit holders that are residents of Sitka that would be displaced if this proposal were to pass. A 2/1 seine ratio at Deep Inlet would shift seine benefit from NSRAA projects from 55% up to potentially 75% of all fleet value from that regional association. A 2/1 ratio would likely shift even more gillnet value from currently the only THA opportunity they have from NSRAA as the majority of the fleet would shift to other areas they could fish more than a day or two a week.

Another drastically devastating proposal to the gillnet fleet is

Proposal 140 which would prohibit gillnetting in Anita Bay THA, the only terminal opportunity in central SE for gillnetters primarily residing in Wrangell and Petersburg. Combined gillnet permits in these two communities total over 130 individual permit holders that would lose access to this SSRAA release by this drastic proposal. This action would not only shift summer chum at this site but there is also Chinook and coho released at this site. The king and coho releases have been sparsely attended by the seine fleet as they are more scratch type fisheries and quality would suffer on these fish as they built up to harvestable levels by the seine fleet.



Nonetheless if we think of how this is justified with allocation we find the gillnet fleet above their range in enhanced fish only due to the success of an association, DIPAC that does not receive 3% tax monies from the fleets. Yet the seine fleet receives more than their combined share of value from associations supported by the SET. We find the seine fleet 1% below their enhanced allocation 5 year rolling average with new production at a level to shift a gear group 10% coming on line at NSRAA. Certainly, any one gear group is not expected to harvest all of the fish from this new production but currently there is no gillnet access at any of these sites.

Furthermore, once DIPAC paid off their hatchery loans from the revolving loan fund their excess cost recovery became a surplus above operation and reserve needs. These monies are and have been granted to NSRAA and SSRAA to buy fleet opportunity in lieu of cost recovery. In 2018 DIPAC monies will be granted to the regionals at the 5.8 million dollar level. History has shown these monies benefit seine more than gillnet and this action alone may very well bring the seine value within their allocation.

We also find a shift of wild value not accounted for in enhanced opportunity afforded to the seine fleet. There has been a “new” fishery in District 2 outside a SSRAA chum release at Kendrick Bay started in 1999 that shifts wild and enhanced value. Over the course of that fishery an average of over 72,000 pinks and over 6,000 sockeye have been harvested annually (by department compiled data). There is also times of high king salmon abundance in this area with recorded harvest of over 2500 in 2016, other years see restrictions of no chinook retention and numbers are not available for kings handled or incidental mortality in this fishery. There is also a shift of enhanced value in this fishery due to interception of Neets Bay returning chum that would have contributed to the troll fishery there.

As we start to get a grasp of the complexities of value being shifted through each of these decisions we question the need for

Proposal 145 which would allow seiners back in to Nakat Inlet THA. This is the smallest summer chum release by SSRAA and an agreement was made by their board in 2003 to go gillnet only at Nakat in exchange for an increase of 10 million at Kendrick which brings that release to 18 million (Kendrick is over 30 million today). I am sure if DIPAC survivals fall and gillnetters requested rotations at Kendrick this would be perceived very hostile by the seine fleet as this proposal is to gillnet.

But what happens if we do shift enhanced value to seine? What happens to their overall value? If we look to the department generated data attached to these comments we would note that their percentage of overall value would go up. But we find they are already harvesting more value than a baseline period prior to adoption of the ESAP. This data was compiled with the assumption that the 10 years prior to adoption of the enhanced salmon management plan was



most relevant and that 5 year rolling average was most consistent with the enhanced salmon management plan, smoothing out highs and lows.

Certainly, we would not need to shift more wild value to the seine fleet as

Proposal 155 would do. Changing the sockeye cap on this mixed stock fishery would likely shift wild pink and sockeye value to the seine fleet. So, let's look at 5AAC 33.363 guidelines for allocating pink, chum and sockeye between net fleets and department data which shows gillnet is already below their accumulative allocation of sockeye and pinks. Any increased opportunity to a fleet that has increased their efficiency tremendously since this was initially in effect in 1989 would be detrimental to the gillnet fleet fishing behind this seine fishery. This migrating corridor to districts 11 and 15 is vital to the economic viability of the gillnet fleet providing over 50% of the total value to our fleet in SE Alaska.

Furthermore, in this BOF meeting action plans will be addressed to limit gillnet opportunity in these districts to conserve chinook salmon. These actions would negatively affect harvest rates significantly for enhanced chum for the gillnet fleet, also passing sockeye and pink salmon through these districts reducing the gillnet percentage of wild pink, chum and sockeye. So why would we even consider liberalizing another fleets opportunity in this area?

Thinking about pink salmon imbalances we should consider

Proposals 154, 169 and 170 which are all pertaining to increasing gillnet access to pink salmon. Currently gillnetters are on average historically below their allocation of pink salmon addressed in 5 AAC 33.363. If we look at this imbalance as a 5 year rolling average as we do for enhanced we find gillnet is short of their allocation by 4 million 129 thousand fish for the last 5 years. This computes to a gillnet shortfall of \$990,000.00 annually from loss of wild pink opportunity. This loss of wild value computes to between 2 and 3 percent annually for the last 5 years of the enhanced value.

Either we could apply this shortfall against the enhanced value and find the seine fleet within their range via an overall value method. Alternatives to this would be to increase seine opportunity in Deep Inlet and Anita Bay and liberalize gillnet opportunity for pink salmon in these proposals. After all if we choose to make allocative shifts for one gear group to satisfy one allocation plan it would not be fair to ignore other allocation plans in those decisions, especially when it shifts historic overall value.

As we look at the pink imbalance I find the need to alter the district 1 management in

Proposal 153 highly unnecessary. On the contrary this proposal should probably be amended to increase gillnet time. As we just referenced the wild pink imbalance in the last group of



proposals we should also note that gillnet participation is down considerably in this district since adoption of this plan. Furthermore, increased efficiency in the seine fleet alone changes the balance since implementation of this management plan.

In conclusion it seems the overall value should be evaluated when considering any allocating shifts in sharing arrangements. Is the intent of the proposer to keep a balance in historic sharing arrangements or give their fleet increased value at the expense of another? In recognition of the current overall value to all fleets, increasing chinook conservation measures that will negatively impact troll and gillnet more than seine and new production coming on line I would ask the board to maintain status quo on proposals that shift value between fleets. Furthermore, I would respectfully ask the BOF to ask the JRPT to evaluate allocation by overall value to be presented back to the BOF in 2021.

Thank you for consideration of these comments,

Chris Guggenbickler



Total Ex-vessel / Overall Salmon Values

Ex-vessel value in five-year rolling averages

	Seine	Troll	Driftnet	S+T+DGN Total	Seine	Troll	Gillnet
1985	\$52,018,934	\$25,009,669	\$17,083,901	\$94,112,504			
1986	\$53,893,815	\$28,074,767	\$14,585,793	\$96,554,375			
1987	\$22,739,529	\$25,368,212	\$19,227,191	\$67,334,932			
1988	\$53,314,374	\$29,827,740	\$32,342,986	\$115,485,100			
1989	\$91,241,060	\$23,526,234	\$20,578,737	\$135,346,031	54%	26%	20%
1990	\$44,821,503	\$31,101,694	\$16,439,366	\$92,362,563	52%	27%	20%
1991	\$36,071,105	\$25,162,099	\$12,037,061	\$73,270,265	51%	28%	21%
1992	\$51,054,882	\$29,351,980	\$20,850,361	\$101,257,223	53%	27%	20%
1993	\$52,894,318	\$26,642,558	\$15,904,271	\$95,441,147	55%	27%	17%
1994	\$61,164,567	\$38,943,302	\$17,207,769	\$117,315,638	51%	32%	17%
1995	\$55,806,812	\$16,673,792	\$16,899,040	\$89,379,644	54%	29%	17%
1996	\$42,813,455	\$16,394,667	\$14,430,995	\$73,639,117	55%	27%	18%
1997	\$40,813,997	\$18,853,651	\$11,143,699	\$70,811,347	57%	26%	17%
1998	\$45,509,746	\$14,974,147	\$11,345,286	\$71,829,179	58%	25%	17%
1999	\$56,402,089	\$20,442,587	\$11,489,118	\$88,333,794	61%	22%	17%
2000	\$38,060,764	\$14,786,178	\$10,940,909	\$63,787,851	61%	23%	16%
2001	\$48,742,800	\$17,191,517	\$11,316,836	\$77,251,153	62%	23%	15%
2002	\$20,244,170	\$13,164,474	\$8,132,853	\$41,541,497	61%	24%	16%
2003	\$26,705,739	\$14,812,555	\$8,903,210	\$50,421,504	59%	25%	16%
2004	\$31,672,452	\$29,016,910	\$11,778,867	\$72,468,229	54%	29%	17%
2005	\$36,073,649	\$26,770,816	\$12,753,519	\$75,597,984	52%	32%	17%
2006	\$27,536,028	\$34,645,633	\$20,007,955	\$82,189,616	44%	37%	19%
2007	\$49,646,050	\$30,985,116	\$15,081,267	\$95,712,433	46%	36%	18%
2008	\$40,986,039	\$36,566,992	\$24,209,429	\$101,762,460	43%	37%	20%
2009	\$48,417,377	\$22,942,077	\$18,578,453	\$89,937,907	46%	34%	20%
2010	\$56,238,100	\$31,945,182	\$26,618,998	\$114,802,280	46%	32%	22%
2011	\$122,177,082	\$32,413,206	\$31,126,506	\$185,716,794	54%	26%	20%
2012	\$73,082,389	\$29,855,484	\$37,475,213	\$140,413,086	54%	24%	22%
2013	\$154,063,995	\$41,312,132	\$29,456,345	\$224,832,472	60%	21%	19%
2014	\$58,358,331	\$46,554,302	\$28,379,708	\$133,292,341	58%	23%	19%
2015	\$55,228,071	\$25,793,745	\$20,621,205	\$101,643,021	59%	22%	19%
2016	\$36,497,295	\$32,187,715	\$22,194,539	\$90,879,549	55%	25%	20%

1985-93				
Average	\$50,894,391	\$27,118,328	\$18,783,296	\$96,796,016
Percentage	53%	28%	19%	

Allocation Plan Percentages

5 AAC 33.364	44-49%	27-32%	24-29%
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'94-'16 Average Ex-vessel Percentage	\$53,314,826	\$26,401,138	\$18,264,857	\$97,980,822
1994-2016	54%	27%	19%	



Hatchery-Produced Salmon Values

Allocation value in five-year rolling averages

	seine	troll	gillnet	Yearly Value
1985	\$3,428,844	\$1,420,786	\$1,200,076	\$6,049,706
1986	\$2,770,790	\$2,400,444	\$1,245,862	\$6,417,096
1987	\$4,298,648	\$1,460,796	\$1,426,244	\$7,185,688
1988	\$5,475,727	\$1,987,416	\$4,547,547	\$12,010,690
1989	\$2,718,810	\$1,599,441	\$2,323,091	\$6,641,342
1990	\$2,318,017	\$3,774,529	\$1,780,854	\$7,873,400
1991	\$2,353,588	\$3,837,368	\$2,217,805	\$8,408,761
1992	\$6,652,722	\$4,782,046	\$4,653,863	\$16,088,631
1993	\$11,089,282	\$4,353,481	\$4,934,886	\$20,377,649
1994	\$8,876,576	\$5,317,271	\$3,797,692	\$17,991,540
1995	\$14,789,338	\$2,871,032	\$7,169,053	\$24,829,423
1996	\$12,061,185	\$3,224,761	\$4,184,597	\$19,470,543
1997	\$10,752,998	\$3,004,073	\$4,037,169	\$17,794,241
1998	\$9,277,676	\$1,973,521	\$3,792,912	\$15,044,109
1999	\$10,061,642	\$3,461,492	\$4,110,113	\$17,633,247
2000	\$17,113,326	\$3,465,550	\$6,219,903	\$26,798,778
2001	\$7,170,159	\$3,752,912	\$4,852,294	\$15,775,364
2002	\$3,645,488	\$2,303,490	\$3,627,174	\$9,576,152
2003	\$3,744,188	\$2,774,408	\$3,385,285	\$9,903,881
2004	\$5,498,187	\$4,139,539	\$5,400,059	\$15,037,785
2005	\$4,405,236	\$3,522,736	\$4,707,650	\$12,635,622
2006	\$15,109,033	\$4,192,671	\$12,215,370	\$31,517,075
2007	\$6,531,971	\$4,728,923	\$8,851,525	\$20,112,418
2008	\$16,158,998	\$7,319,611	\$16,385,073	\$39,863,682
2009	\$12,746,563	\$4,032,749	\$12,255,256	\$29,034,568
2010	\$17,451,677	\$7,215,190	\$15,728,240	\$40,395,107
2011	\$15,430,492	\$9,109,654	\$20,391,332	\$44,931,479
2012	\$34,363,203	\$8,113,226	\$28,453,598	\$72,137,175
2013	\$24,834,517	\$13,266,168	\$19,221,485	\$57,303,369
2014	\$12,912,970	\$8,786,771	\$17,772,977	\$37,637,261
2015	\$16,689,459	\$6,063,853	\$13,068,340	\$35,821,652
2016	\$10,513,342	\$5,018,230	\$11,450,087	\$26,981,660

Seine	Troll	Gillnet
49%	23%	28%
44%	28%	28%
41%	30%	29%
38%	31%	30%
42%	31%	27%
44%	31%	25%
50%	24%	26%
54%	21%	25%
57%	19%	24%
59%	17%	24%
60%	15%	25%
61%	16%	23%
58%	17%	25%
56%	18%	27%
52%	20%	28%
48%	21%	30%
39%	26%	35%
41%	22%	37%
40%	22%	39%
40%	20%	40%
41%	18%	41%
42%	17%	41%
39%	19%	42%
42%	16%	41%
43%	17%	39%
42%	18%	40%
42%	18%	40%
43%	18%	39%

1985-'93				
Average	\$4,567,381	\$2,846,256	\$2,703,359	\$10,116,996
Percentage	45%	28%	27%	

Plan %	44-49%	27-32%	24-29%
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1994-'16				
Average	\$12,614,705	\$5,115,558	\$10,046,834	\$27,748,962
Percentage	45%	18%	36%	



**Natural Production Values
(Ex-vessel minus hatchery-produced)**

**Natural production
value in five-year
rolling averages**

	seine	troll	gillnet	total	Seine	Troll	Gillnet
1985	\$48,590,090	\$23,588,883	\$15,883,825	\$88,062,798			
1986	\$51,123,025	\$25,674,323	\$13,339,931	\$90,137,279			
1987	\$18,440,881	\$23,907,416	\$17,800,947	\$60,149,244			
1988	\$47,838,647	\$27,840,324	\$27,795,439	\$103,474,410			
1989	\$88,522,250	\$21,926,793	\$18,255,646	\$128,704,689	54%	26%	20%
1990	\$42,503,486	\$27,327,165	\$14,658,512	\$84,489,163	53%	27%	20%
1991	\$33,717,517	\$21,324,731	\$9,819,256	\$64,861,504	52%	28%	20%
1992	\$44,402,160	\$24,569,934	\$16,196,498	\$85,168,592	55%	26%	19%
1993	\$41,805,036	\$22,289,077	\$10,969,385	\$75,063,498	57%	27%	16%
1994	\$52,287,991	\$33,626,031	\$13,410,077	\$99,324,098	53%	32%	16%
1995	\$41,017,474	\$13,802,760	\$9,729,987	\$64,550,221	55%	30%	15%
1996	\$30,752,270	\$13,169,906	\$10,246,398	\$54,168,574	56%	28%	16%
1997	\$30,060,999	\$15,849,578	\$7,106,530	\$53,017,106	57%	29%	15%
1998	\$36,232,070	\$13,000,626	\$7,552,374	\$56,785,070	58%	27%	15%
1999	\$46,340,447	\$16,981,095	\$7,379,005	\$70,700,547	62%	24%	14%
2000	\$20,947,438	\$11,320,628	\$4,721,006	\$36,989,073	60%	26%	14%
2001	\$41,572,641	\$13,438,605	\$6,464,542	\$61,475,789	63%	25%	12%
2002	\$16,598,682	\$10,860,984	\$4,505,679	\$31,965,345	63%	25%	12%
2003	\$22,961,551	\$12,038,147	\$5,517,925	\$40,517,623	61%	27%	12%
2004	\$26,174,265	\$24,877,371	\$6,378,808	\$57,430,444	56%	32%	12%
2005	\$31,668,413	\$23,248,080	\$8,045,869	\$62,962,362	55%	33%	12%
2006	\$12,426,995	\$30,452,962	\$7,792,585	\$50,672,541	45%	42%	13%
2007	\$43,114,079	\$26,256,193	\$6,229,742	\$75,600,015	47%	41%	12%
2008	\$24,827,041	\$29,247,381	\$7,824,356	\$61,898,778	45%	43%	12%
2009	\$35,670,814	\$18,909,328	\$6,323,197	\$60,903,339	47%	41%	12%
2010	\$38,786,423	\$24,729,992	\$10,890,758	\$74,407,173	48%	40%	12%
2011	\$106,746,590	\$23,303,552	\$10,735,174	\$140,785,315	60%	30%	10%
2012	\$38,719,186	\$21,742,258	\$9,021,615	\$69,483,059	60%	29%	11%
2013	\$129,229,478	\$28,045,964	\$10,234,860	\$167,510,302	68%	23%	9%
2014	\$45,445,361	\$37,767,531	\$10,606,731	\$93,819,623	66%	25%	9%
2015	\$38,538,612	\$19,729,892	\$7,552,865	\$65,821,369	67%	24%	9%
2016	\$25,983,953	\$27,169,485	\$10,744,452	\$63,897,890	60%	29%	10%
1985-'93							
Average	\$46,327,010	\$24,272,072	\$16,079,938	\$86,679,020			
Percentage	53%	28%	19%				
Plan %	44-49%	27-32%	24-29%				
1994-'16							
Average	\$40,700,121	\$21,285,580	\$8,218,023	\$70,203,724			
Percentage	58%	30%	12%				





Submitted By
Christopher Thorgesen
Submitted On
12/28/2017 2:51:40 PM
Affiliation

Phone
907-713-7213
Email
acathor@yahoo.com
Address
PO BOX 887
Haines, Alaska 99827

To Whom It May Concern Regarding the Southeast Alaska Proposed King Salmon Closure:

As a year round Haines resident who owns a Charter Fishing Company in Haines, I would like to submit my comments.

I believe there are only 3 charter fishing boats in Haines and 3 charter fishing boats in Skagway which fish for King Salmon . The combined catch for 2018 would be so small as to make zero actual difference in King Salmon survival rate. As last year was a catch-and-release year for King Salmon, I doubt very seriously that the combined mortality rate would make any difference whatsoever. I know that we caught only two king salmon in 2017 and both were released without incident due to our barbless hooks and heightened awareness of the low King Salmon population.

Conversely, should the rule change from catch-and-release to no fishing at all, the effects would be gravely felt by both communities, in particular for those who own, work on, or repair these boats. Tourists will pay top dollar to fish for a salmon that they will not likely catch and must return immediately if they do. However, these same tourists will pay nothing should the salmon fishing be discontinued altogether. The harbors will not benefit from the boat slip sales, fuel sales, and taxes. The state will feel the loss of license and king salmon stamp sales, and the communities will feel the loss of jobs, necessary supply sales, and sales tax collections.

The cost-to-benefit ratio on fully discontinuing king salmon fishing as opposed to simply making charter fishing catch and release only with mandatory barbless hooks is just not worth it.

Please vote to keep king salmon fishing in 15A for the full season and keep this entire season catch and release only.

Thank you for your time,

Christopher S. Thorgesen

Kraken Charters LLC

PO BOX 887

Haines, AK 99827

acathor@yahoo.com

907-713-7213



Submitted By
Claire Sanchez
Submitted On
12/14/2017 5:38:37 PM
Affiliation

Phone
630-818-5960
Email
csanchez3434@gmail.com
Address
509 O'Cain St. Apt.B
Sitka, Alaska 99835

Dear Board of Fisheries,

I am writing in support of Board of Fisheries Proposals 99, 105, and 106. Herring are nowhere near as abundant as Traditional Knowledge indicates they once were and a more conservative management approach is needed. Herring are a keystone species and healthy herring populations are needed to ensure a functioning marine ecosystem.

Every conscientious examination of the issue shows that conservation and subsistence use must take precedence over a commercial sac-roe fishery. Herring fisheries up and down the Pacific Northwest Coast have collapsed, and the Sitka Sound population the last sizable population. The fundamentals of fishery management dictate that we manage this last viable population conservatively. Herring play a fundamental role in the marine ecosystems that support all of Alaska's fisheries. Yet the sac-roe fishery is extremely wasteful. Subsistence users have always known, and Alaskan statute dictates, that wasteful harvest is unethical.

Please support Board of Fisheries Proposals 99, 105, and 106.
Please oppose Board of Fisheries Proposals 94 and 104.

Sincerely,
Claire Sanchez



Submitted By
Clare Kelly
Submitted On
12/28/2017 2:03:06 PM
Affiliation

Phone
907 747 4523

Email
Ckk36@georgetown.edu

Address
105 C Monastery St.
Sitka, Alaska 99835

I am writing to you today in support of proposal 99 which will put a 10% biomass cap on the commercial Herring roe harvest. This proposal is supported by both the STA and the local board of fish advisory committee. Herring stock is significantly declining due to over-harvesting roe by commercial fisheries. This cap is ecologically and culturally critical for the protection of the Herring stock both as a base part of the local food chain, which supports all local fisheries, and as an essential traditional food source for Alaskan Natives. It is imperative that we act to protect and conserve the herring fishery for use by future generations and especially to address the ongoing cultural violence Alaskan Natives to whom this land rightfully belongs.



Submitted By
Connie I LaPerriere
Submitted On
12/20/2017 10:31:38 AM
Affiliation

I am writing to ask that you reduce the sac roe harvest level. My preference would be to eliminate the fishery. However, Proposal 99 to reduce the harvest level to 10% of forecast biomass would be a step in the right direction. Please consider this reduction for the health of our ecosystems and the other fish that rely on Herring.



Submitted By
Curt Schlosser
Submitted On
12/28/2017 10:01:35 AM
Affiliation

Phone
541-664-1829
Email
curtsch66@gmail.com

Address
8375 Gold Ray rd.
Central Point, Oregon 97502

Curtis c. Schlosser **Proposal 165**

8375 Gold Ray rd.
Central Point, OR 97502

To ADF&G and To Whom It May Concern:

I am writing this letter to express my concerns and preferences on upcoming proposal for the TSIU fishery and other rivers on the coast. I have fished the Tsiu River about ten years out of the last twelve. I also can attest to the conflict and clash between the rod and reel sportfishers and the commercial fishers. I have witnessed and videoed the commercial takers spinning their boats upstream and downstream of their nets harassing and scarring the fish into their nets and saw many dead fish floating downstream afterwards.. Is that not the definition of "Wanton Waste".

I also vividly remember several years ago when we got out early and had staked a place to fish in a channel and after about an hour, here comes the roar of commercial jetboats and one landed right in front of me where I was fly fishing. A guy jumped out and started driving a stake to stretch their net on, I said to him "What are you doing", to my amazement he would not answer me but completely ignored me as if I did not exist. My background is 38 years military service from Vietnam to 2005, I retired US Army LTC (Lieutenant Colonel) out of Fort Richardson, I started enlisted and rose to that rank. I was not used to someone disrespecting me by not even acknowledging me or returning a response. I was not used to being treated that way. That young fellow does not realize how close he came to an extreme physical lesson in how to treat people and not disrespect them. I did not give 38 years of my life in the military to being disrespected that way. I have come to realize that seems to be a code among the commercial guys that they ignore us and treat us as someone who has no right to be there, they have all the license not us. We are no stakeholders to them. They get tons of fish, we get a few pounds.

My strong recommendation is that each year, the dynamic river channels be analyzed and new markers are set to keep these rude commercial fishermen away from the sportfishers to avoid confrontations. They seem to lack the common people skills to

interact with respect.

Curtis C. Schlosser

US Army LTC (Retired)





Submitted By
Dale Bosworth
Submitted On
12/26/2017 9:16:01 AM
Affiliation

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907-518-0907
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Address
PO Box 45
Petersburg, Alaska 99833

Proposal 116- Support

My reason supporting proposal 116 is that management needs to have control of his harvest. Because of the value of sablefish and unrestricted fishing, the temptation to illegally barter or sell sablefish is very probable.

Proposals 117, 118, 119, 120, 121, 122- Oppose

My reasons for opposing 117 through 122 are as follows:

1. ADF&G and the Alaska Board of Fish have done an excellent job of management. The biologists on the survey vessel have first-hand knowledge of the fish stocks, far surpassing any federal stock assessment.
2. Limited entry has been a tool for management. Change one gear group to another would put limited entry in jeopardy. There would be lawsuits from many user groups.
3. The SSEI sablefish fishery is well managed with a 2.5 month longline season and a 2.5 month pot fishery season. I believe this should continue as is.
4. The experienced longline fisherman bycatch is insignificant. Hagfish and sand fleas can be avoided. Experienced skippers and crews, their record for lost gear is better than those lost pots in other fisheries. Bycatch for longliners should be broken down into 3 parts: 1. Hook and release 2. Discard of dead fish and fish not marketable 3. Bycatch- the fish on deck to be sold.. Ex. spiny thornyhead- a small percentage may be retained and sold. There is no directed fishing allowed but is well managed as a bycatch.
5. I feel whale predation has been overplayed. As a longline skipper and crew member on other vessels I have never seen any whale predation. The survey vessel in Clarence Straits 2017 saw no whale predation. I do know whale entanglement in crab pot bouyline has been deadly.
6. Pots are not always hauled in a timely manner, therefore I would expect gear loss to marine traffic especially tug and barge traffic to be significant. There will be gear loss due to gear conflict.



To: Board of Fisheries concerning SE Shellfish
From: Dan Sharp
Concerning: PROPOSAL 84

Please amend the following regulation to as stated:

5 AAC 31.136. Closed waters in Registration Area A.

Close additional waters in District 2 to commercial pot shrimp fishing,
as follows:

(4) Shrimp may not be taken: in the waters of Kasaan Bay north and west
of a line from
the northern most tip of Daisy Island located at 55'28.816'N lat,
132'19.379"W long.
northeast to a point on Kasaan Peninsula located at 55'30.533'N lat,
132'18.191'W,
including all waters of Twelve-mile Arm;

Reason:

Over the years, District 2 commercial shrimp season has caused a
continual
downward trend to the shrimp biomass in the waters of Kasaan Bay and
Twelve-mile arm to a
point where the area can no longer support a commercial fishery.

I came to Alaska in 1974 as a commercial fisherman and have always been a
supporter of commercial fishing.

I have lived in Kasaan bay for 41 years and have supported the commercial
pot fisherie in Kasaan bay when

ALL my friends and neighbors did not! until 2014!

Until 2014 I could ALWAYS catch enough shrimp for my family after the
commercial season was over. Now you
might catch enough in 5- 40" pots for an omelot.

ADF&G began a new pot gear survey in Kasaan Bay beginning pre-season in
2011. This survey
has continually shown a sharp decline of the shrimp biomass. In the 2013
shrimp season,
ADF&G began asking commercial shrimp fishermen to fill out logbooks of
their catch.

The 2013 October commercial shrimp season for District 2 has left the
personal use shrimpers
with a low shrimp biomass in Kasaan Bay and Twelve-mile Arm. The shrimp
biomass has been
extremely slow to increase and has not recovered from the decimation.
District 2 itself is a large



area; however the commercial fishing fleet focused their efforts in the waters of Kasaan Bay and Twelve-mile Arm in 2013 which are adjacent to the communities of Hollis and Kasaan. Both areas were hard to navigate during the fishery from the large amount of commercial gear.

I am requesting that the Board of Fisheries enact this regulation change as written to protect the personal use shrimp fishery for the residents of Alaska.



From:
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: FW: Personal Use BOF SE Region meeting public comment
Date: Wednesday, December 27, 2017 1:25:45 PM

Sent: Wednesday, December 27, 2017 11:47 AM
To: DFG, DSF R2 Support (DFG sponsored)
Subject: Personal Use

Daniel Martin, phone number: 907 736 2323, has sent you the following inquiry from our website:

This is a recommendation to the Board of fish, meeting in Sitka soon. Those of us who reside full time in Tenakee Springs would like to see the personal use shrimp fishery managed as follows. Cut the pot limit to 5 per person, 20 per boat, daily bag limit no more than 2 gallons of tails, and manage it for a fall/winter fishery, opening September 15th and closing April 15th. Who would this benefit? Year round residents of Tenakee Springs. Who would it impact, the summer folks who claim residence here but are only here 3 months of the year, and of whom there are a few who ship literally hundreds of pound of product out of state. Most of the "summer" folks spend their winter's some where in there lower 48, mostly Arizona..

That being said, we are all grateful that ADF&G is giving us a 2 and a half month opportunity to harvest a few spot shrimp to eat.



October 2, 2017

To: Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: EF-F17-067 Request for Board support for CFEC regulatory change

Dear Board Members,

In April of this year we submitted a proposal to allow existing Sitka Sound Sac Roe Seine permit holders to use open pound roe on kelp as an alternative to seining in the harvest of herring eggs from Sitka Sound. The proposal was similar to what was presented to the Alaska Board of Fisheries (Board) during the last cycle in 2014/15. As some of you may recall there is divergence on whether or not the Board had the statutory authority to act on the proposal. There seems to be a circular argument taking place: The Board cannot act on the proposal until Commercial Fisheries Entry Commission (CFEC) makes changes and CFEC will not make changes until the Board acts on the proposal. Interesting to note: The most recent letter indicates the Board cannot dictate gear used as opposed to the administrative area overlap which was previously believed to be the problem.

In continued dialogue with CFEC we continue to be told that CFEC will not act until the Board acts. This has been stated in virtually every memo and exchange the Board has had with CFEC regarding this situation. Why is the Board's council so staunch in an opinion which differs from CFEC's view? Why is it that folks involved in the same process, reading the same statutes, can't arrive at a similar conclusion?

The proposal in question encourages a change which would result in increased fishery value combined with a reduction in the amount of fishing mortality. To anyone tasked with resource management this is a win/win scenario. This proposal offers more value for less resource removal. Why shouldn't the Board have opportunity to approve or deny such a concept? Isn't this what the Board of Fisheries is for?

We have attached documents supporting our position that the Board should be able to act on our proposal. The proposal was never intended for, or submitted to, CFEC as CFEC has made it clear they wish the Board to present a position to them before they will propose regulation. Contrary to CFEC's opinion there is support from Sitka permit holders however; the support letters were submitted to the Board and not CFEC. We believe the proposal in question is a good idea which will improve a fishery. We believe the decision of whether the proposal is carried or fails should be left up to the Board of Fisheries. Please find a way for this proposal to be heard, debated, and decided by the Board.

Thank you for your time.

Regards,

Darrell and Ryan Kapp



THE STATE
of ALASKA
GOVERNOR BILL WALDEE

Department of Fish and Game

BOARDS SUPPORT SECTION
Headquarters Office

1255 WOOD BIRCH DRIVE

P.O. BOX 115224

ANCHORAGE, ALASKA 99511-5224

PHONE: 907-465-8111

FAX: 907-465-8100

www.adfg.state.ak.us

August 2, 2017

Mr. Darrell Kapp
338 Bayside Road
Bellingham, Washington 98225

Subject: 2017/2018 Board of Fisheries Proposal Review

Dear Mr. Kapp:

On behalf of the Board of Fisheries (board) and Department of Fish and Game (department), thank you for submitting a proposal for consideration by the board in the 2017/2018 meeting cycle. Proposals accepted for the meeting cycle are in response to the Call for Proposal that was issued by the board in the fall of 2016. The call sought proposals for regulatory change in Title 5 of the Alaska Administrative Code specifically for finfish in the Prince William Sound Area including Upper Copper and Upper Susitna Rivers, finfish and shellfish in the Southeastern Alaska and Yakutat Areas, and Dungeness crab, shrimp, and other miscellaneous shellfish in all other statewide regions.

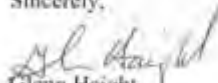
As part of the proposal review, the department looks to see if proposals are related to the regulations cited in the call, within the board's statutory authority to act, clear and understandable, and seeking regulatory change. There are occasions when proposals do not meet this baseline review and are not entered into the meeting cycle proposal book.

The proposal you submitted, EF-F17-067, seeks to create a herring pound fishery in Sitka Sound to allow existing herring sac roe permit holders the option of using either gear, or if board authority does not exist, express support for the concept to the Commercial Fishery Entry Commission (CFEC).

The board does not have the authority to determine which gear will be used by limited entry permit holders. As noted in your proposal that is under the authority of CFEC. The proposal will be added to the board's October 2017 work session work book in the event they care to take up the subject of expressing support to CFEC for this concept. If you would like to provide additional information to the board prior to that meeting, the due date for public comment is October 3, 2017.

Again, thank you for taking a personal interest and direct action in Alaska's fish and game management system.

Sincerely,


Glenn Haight
Executive Director



Ryan Kapp RC100

MEMORANDUM STATE OF ALASKA
COMMERCIAL FISHERIES ENTRY COMMISSION

TO: Alaska Board of Fisheries

DATE: January 12, 2000

Dan K. Coffey, Chairman
Ed Dersham
Larry J. Engel
Grant Miller
Russell Nelson
Virgil L. Umphedour
Dr. John R. White

PHONE: (907) 789-6160 VOICE
(907) 789-6170 FAX



FROM: Commercial Fisheries
Entry Commission

SUBJECT: Board Proposals 168, 175 and 174-
Optional Open Pounding
Alternative for the Southeast Roe
Herring Seine Fishery (Sitka Sound)

Marlene Johnson, Commissioner
Mary McDowell, Commissioner
Bruce Twomley, Chairman

Board Proposals 168 and 175 would authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery. Board Proposal 174 opposes the change.

The Board previously considered this issue in January of 1997 (Proposal 441). Our comments at the time (coordinated with those of the Department of Law) remain current today. This memo is a recap.

*

Since our 1997 communications, (1) the Department has experienced managing the experimental, Sitka Sound open pound fishery authorized by the Board in 1997; and (2) the Board authorized a herring pound spawn-on-kelp alternative for Norton Sound herring limited entry permit holders (both gillnet and beach seine). 5 AAC 27.965.

If the Board were to act favorably on Proposals 168 and 175, the Board should be very clear its action affects only the existing, limited Sitka Sound roe herring purse seine fishery.

In turn, following favorable Board action on Proposals 168 and 175, CFEC would stand ready to propose complimentary changes to its regulations. To adopt such regulations after a public comment period, CFEC would be required to determine independently that the purposes of the Limited Entry Act would be served by doing so.

In particular, CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted. Compare 20 AAC 230(a) and 5 AAC 33.200(m)(2). CFEC would likely propose



modification of its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area included within the Board's definition of the Sitka Sound roe herring purse seine fishery.

In making and considering this proposal, CFEC would be guided by the Limited Entry Act, AS 16.43.200, which reads in relevant part as follows:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative areas reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

* * *

The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

Generally, the Entry Commission would also be guided by AS 16.43.950, which, in relevant part, provides:

Nothing in [the Limited Entry Act] limits the powers of the Board of Fisheries, including the power to determine legal types of gear and the power to establish size limitations or other uniform restrictions applying to a certain type of gear. Holders of interim-use permits or entry permits issued under this chapter are subject to all regulations adopted by the Board of Fisheries.

Our regulatory procedure would allow us to meet our responsibility under the Limited Entry Act, and, additionally, help generate public awareness and comment (particularly from members of the public who believe they have interests under the limited entry system that should be addressed). Our procedure creates an opportunity for the commission to clarify potential ambiguity between regulations of the Board and of the commission. The commission must reserve judgment on the issue until it has received public comment.

Bruce Twomley plans to report to the Board on Saturday, January 15, 2000.

If the Board has additional questions during the following Board meetings, at least one of the following individuals will be available by phone at 789-6160: Bruce Twomley, Susan Haymes, or Kurt Schelle.

cc: Frank Rue, Commissioner, ADF&G
Doug Mecum, Director of Commercial Fisheries
Scott Marshall, Regional Supervisor
Diana Cote, Executive Director, Board of Fisheries
Stephen White, Assistant Attorney General



MEMORANDUM

STATE OF ALASKA *Department of Law*

To: Glenn Haight
Executive Director
Alaska Board of Fisheries

Date: February 11, 2015

File No.: JU2014200582

Tel. No.: 269-5232

Fax: 279-2834

From: Lance Nelson
Seth Beausang
Assistant Attorneys General
Natural Resources Section
Department of Law

Subject: **Comments on Proposals for
2015 Board of Fisheries
Meeting on Southeast
Alaska/Yakutat Finfish Issues**

The Department of Law has the following comments on the proposals to be considered by the Board of Fisheries at its 2015 meeting in Sitka on regulations for Southeast Alaska and Yakutat Areas finfish issues.

Proposal 124: This proposal would authorize equal share quotas for participants in the Sitka Sound sac roe herring fishery during years when 70% of permit holders voted in favor of such quotas. This is likely beyond the authority of the board. The board may not delegate its authority to decide how a fishery is prosecuted to anyone other than the commissioner or department, especially when there are expected to be individual fishers who do not favor the quota.

Proposal 126: This proposal would allow herring seiners to opt to use open herring pounds in lieu of their seine gear. Southeast Alaska herring pound limited entry permit holders are generally the only users who can participate in a pound fishery in their administrative area, not seiners. "Herring pound" is generally defined as "an enclosure used primarily to retain herring alive over an extended period of time." 5 AAC 39.105(d)(20). But in Southeast Alaska, a "herring pound" can include an "open pound" which is defined in 5 AAC 27.130(e)(2). The board likely does not have authority to allow additional users into this limited entry fishery without prior action by the Commercial Fisheries Entry Commission (CFEC).

Proposals 131-134: These proposals raise similar issues as in Proposal 126. There are already three permit holders in the Southern Southeast sablefish limited entry pot fishery. 20 AAC 05.320(e). The board likely does not have authority to allow additional users into this limited entry fishery without prior action by the CFEC.

Proposal 148: If the board authorizes community harvest permits, such permits could not be limited to residents of Hoonah or any other particular community.

Proposal 155: This proposal would allow "boat" or "party limits" for sport fishing rather than bag or possession limits that apply to individuals. One consideration



THE STATE
of ALASKA
GOVERNING BILL WALKER

RC 142
Department of Fish and Game
ALASKA BOARD OF FISHERIES

1255 West 8th Street
P.O. Box 115026
Juneau, Alaska 99811-5026
Main: 907.465.4119
Fax: 907.465.6094

March 3, 2015

Bruce Twomley
Chairman, Alaska Commercial Fisheries Entry Commission
P.O. Box 110302,
Juneau, AK 99811-0302

Subject: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Chairman Twomley:

During the 2015 Southeast and Yakutat Finfish meeting in Sitka this past week, the Board of Fisheries considered Proposal 126, which would allow Sitka Sound herring seine permit holders to utilize open pounds to harvest roe on kelp in lieu of their customary sac-roe herring seine gear.

You may be aware the Sitka Sound herring fishery value has declined somewhat over the past few years with the market price falling below \$200/ton.

Also, the Sitka Tribe has encouraged the Board to reduce open fishing area and diminish harvest levels.

In considering Proposal 126, the Board was intrigued that the open pound fishery might provide a potentially higher price-point product to the market.

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the Southern Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open pound gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear for seine permits.

The Board was offered a variety of options by the Department of Law for action on Proposal 126 in light of the inability of the Board to pass the proposal as written, including passing the proposal contingent on eventual approval by CFEC. Not knowing whether or when CFEC might act, the Board found it difficult to craft appropriate language. The Board decided it was more appropriate for the proposer to approach CFEC for approval of this concept before the Board would take subsequent action and allow current seine permit holders the option of utilizing open pound alternative gear.



Commissioner Bruce Twomley

- 2 -

March 3, 2015

Accordingly, I am writing to inform you that the Board is open to further consideration of the proposal, and encourages the CFEC to assess the feasibility of acting to allow this fishery when approached by the proposer, Mr. Ryan Kapp.

You may already be aware of this concept as it has been before both the Board of Fisheries and CFEC over the years. We understand that CFEC may need a fair amount of time to make its determination.

Best Regards,

A handwritten signature in black ink that reads "Tom Kluberton".

Tom Kluberton, Chairman
Alaska Board of Fisheries

Attached: Proposal 126

CC: The Honorable Sam Cotten, Commissioner ADF&G



THE STATE
of ALASKA
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

6880 Glacier Highway, Suite 100
PO Box 110303
Juneau, Alaska 99801-0303
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Toll Free 800.786.6158
Fax 907.589.0170

May 13, 2015

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

Re: Board of Fisheries Action on Southeast and Yakutat Finfish
Meeting Proposal 126

Dear Chairman Kluberton:

I am sorry for the time that this response to your March 3, 2015 letter has taken. CFEC and I have had much more than the usual interruptions during the intervening period.

You called our attention to Board Proposal 126, which appears to be intended to authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery.

An issue arising from the proposal is that CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted.

Your letter suggested the following approach:

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

* * *



A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the [Northern] Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear of seine permits.

I dithered over this a little bit, because I am accustomed to the Board first making a methods and means decision conditioned on subsequent independent regulatory action by the commission. However, there is at least a *prima facie* case for CFEC making a regulatory proposal that would modify its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area within Board's definition of the Sitka Sound roe herring purse seine fishery. Because our administrative area definition includes another limited fishery subject to Board regulation, there is an argument that we have not fully met our statutory duties under the Limited Entry Act AS 16.43.200, which reads in relevant parts as follow:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

+ + +


The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

We will develop and publish a regulatory proposal for public comment. Of course, we will have to reserve judgment, until we have heard all the public testimony, as to whether the proposal is or is not consistent with the purposes of the Limited Entry Act. I can think of



competing analyses, and I am not sure about where this proposal will end up. But we can ensure that all sides are heard and fairly considered.

By Direction of the
COMMERCIAL FISHERIES ENTRY COMMISSION


Benjamin Brown, Commissioner
Bruce Twomey, Chairman

cc: The Honorable Sam Cotten
Commissioner, ADF&G



This is a public hearing on CFEC's regulatory proposal to modify CFEC's administrative area definition for the Northern Southeast herring spawn-on-kelp pound fishery.

Now I'd like to introduce fellow staff members sitting here with me. I have my Co-Commissioner (Benjamin Brown). We have our Law Specialist (Doug Rickey) and we have Head of our Research (Craig Farrington). And we are the folks in response to your testimony who are likely to be asking you questions. And so as we go forward if someone has a question if you'd just get my attention I'll acknowledge you for the record and so they know who's speaking.

Also before we begin I really want to extend a thank you to (Randy Lippert), (David Pierce), and (Ty McMichael) for helping make this work. You guys have done a splendid job. And we are also grateful to GCI and particularly (Julie Pierce) who has helped us through this process.

Now before we begin taking testimony I wanted to say just a few words about the procedure and our regulatory proposal to remove Sitka Sound from our administrative area of definition for the Northern Southeast herring spawn-on-kelp pound fishery. I mean, as you know, earlier board proposal 126 asked the Board of Fisheries to authorize open ponding as an alternative means for the Sitka Sound roe herring fishery.

Now proposal 126 is not at issue in this proceeding but it certainly was the catalyst for this proceeding and our proposal - the trigger that led to this hearing. And you'll notice that CFEC's proposal in front of you says nothing about proposal 126. Our proposal addresses only our area definition. And I wanted to tell you that we made this proposal for two reasons. And the first is that we were asked to do so by the Board of Fish and by the Department of



Law. And that's unusual but that request had a certain amount of force. We like to be good colleagues and cooperate where we can. But there's a second reason and that's actually what prepared us forward to make this proposal.

We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 - Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries. And it further says that the Commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of the Limited Entry Act.

So, I mean, for us the question that was raised was why did we define the area for Northern (rolunt) kelp to include Sitka Sound in the first place. And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that. And of course the managers of Sitka Sound have never told us that they wanted to invite more participants in that fishery. It seems that there are plenty of demands there now.

And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute. We just didn't have a stated reason for having included Sitka Sound in that definition. And so we made this proposal and maybe you folks through your testimony can provide us with a sound reason for maintaining the definition or maybe not. It will - much of that will turn on your testimony.

But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126. And please note that however - whichever way CFEC decides on our proposal the Board of Fisheries could still take up proposal 126. And if the Board were to act favorably on proposal 126 then



CFEC would have to review the Board's action for consideration of whether the Board's action was consistent with the purposes of the Limited Entry Act under Alaska Statute 16.43.4112. And the basic purposes for a Limited Entry that we'd have to have in mind are that Limited Entry is intended to serve conservation and prevent economic distress among fishermen and those depended upon them for a livelihood. That's the most basic standard we work with.

And another thing to keep in mind is that the Board has means and methods authority under Alaska Statute 16.05.251. In turn, the Limited Entry Act governing us Alaska Statute 16.43.950 declares -- and I'm paraphrasing -- nothing in the Limited Entry Act limits the powers of the Board of Fisheries including the power to determine the legal types of gear.

So the short of this proceeding is if the Board in the future acts favorably on Proposal 126 the Board's action will need to come back to CFEC and CFEC will have to determine whether the Board's action is consistent with the purposes of the Limited Entry Act to give it effect.

And so that's when CFEC will be called upon to address the merits. If this does come back to us of course you will all get notice -- anyone interested will get notice -- and have an opportunity to address the merits as well.

So I think we're ready to move forward with your testimony. And if you have questions I'd like you to raise the questions while you are testifying. And we're going to start first with a testimony of people who have traveled here and who are here in this room to testify to us. When we get through your testimony then we'll turn to the people who are lined up on the phone to give their testimony.



THE STATE
of ALASKA
GOVERNOR BILL WALDEE



PC 16
1 of 79

Commercial Fisheries Entry Commission

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Phone: 907, 786,6180
Fax: 907, 786,6180

January 8, 2016

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

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

After due consideration, the Commission has decided to take no further action on the proposal, as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.

When the Entry Commission considered a petition to limit the pound fisheries in Southeast Alaska in 1994, ADF&G Commissioner Carl Rosier sent us a memorandum regarding the Department's management and conservation concerns with the fisheries in the Hoonah Sound and Craig/Klawock areas. The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two



smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you and have any questions regarding this matter.

Yours Truly,
Commercial Fisheries Entry Commission

Bruce Twomley, Chairman
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)
Sitka Tribe of Alaska
Southeast Alaska Seiners Association



MEMORANDUM

State of Alaska

Department of Law

TO: Glenn Haight
Executive Director
Alaska Board of Fisheries

DATE: March 4, 2016

FILE NO.: JU2015200517

FROM: Seth M. Beausang *SMB*
Assistant Attorney General

TEL. NO.: 269-5289

SUBJECT: Department of Law
comments on proposals
for the March 8-11, 2016
Statewide Finfish and
Supplemental Issues
meeting

The Department of Law has the following comments on the proposals to be considered by the Board of Fisheries at its March 8-11, 2016 Statewide Finfish and Supplemental Issues meeting:

Proposal 126: As we explained to the board last cycle, this proposal would allow Southeastern Alaska herring purse seine permit holders in Sitka to use open herring pounds in Sitka Sound in lieu of their seine gear. The Northern Southeast herring pound fishery is a limited entry fishery and includes Sitka Sound within the limited entry administrative area. In Southeastern Alaska, a "herring pound" can include an "open pound," which is defined in 5 AAC 27.130(e)(2). The board does not have authority to allow new entrants into the Northern Southeast herring pound limited entry fishery by allowing non-permit holders to use open pounds in the fishery. We understand from PC 16 that CFEC considered changing the administrative area of this limited entry fishery, in order to allow the board to act on this proposal, but that CFEC ultimately declined to change the administrative area. The board does not have the authority to adopt this proposal.

Proposal 194: Based on the statements in the proposal about the alleged impacts of trawl fishing on subsistence uses in this area, the board is encouraged to consider



		FISH AND GAME	SUPPORT	GENERAL COMMENT	OPPOSITION
126-2014-2015	Establish a commercial open pound herring spawn on kelp fishery in Sitka Sound. (Tabled at 2015 Southeast Finfish meeting for consideration at this meeting.)	N	<ul style="list-style-type: none"> • Edna Bay AC 25 • Alan Otness PC 5 • William R. Menish PC 9 • Ryan Kapp PC 14 • Gary Soydam PC 22 • Joe Lindholm PC 25 • Darrell Kapp PC 42 • Steve Feenstra PC 45 • Terry Kilbreath PC 49 	<ul style="list-style-type: none"> • CFEC PC 16 	<ul style="list-style-type: none"> • Sitka AC 17 • Wrangell AC 20 • Sitka Tribe of Alaska PC 2 • Clyde Curry PC 17/18 • Clyde Curry PC 18 • Don Johnson PC 19 • Joel Randrup PC 29 • Larry Demmert PC 30 • Southeast Alaska Fishermen Alliance PC 44 • United Southeast Alaska Gillnetters PC 52
<i>Identification of Gear (2 proposals) (This set of proposals was also heard at the Bristol Bay Finfish meeting where public testimony was taken.)</i>					
27	Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers.	N	<ul style="list-style-type: none"> • Cooper Landing AC 11 		<ul style="list-style-type: none"> • Central Peninsula AC 6
28	Change the character size requirements for set gillnet marking signs.	N			<ul style="list-style-type: none"> • Central Peninsula AC 6
<i>Salmon (1 proposal)</i>					



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

Re; Support for writing letter to CFEC to Change the Boundaries taking out the Sitka Roe herring Seine area from the Northern Southeast herring spawn on kelp area

Dear Chairman Jensen and Board of Fisheries Members,

Our Problem.

1. Board of Fisheries writes letter to CFEC requesting CFEC to exclude Sitka Sound from the administrative area from the Northern Southeast herring spawn on kelp area.
2. CFEC has a hearing Nov. 6, 2015.
3. CFEC writes back to the Board" After due consideration, the Commission has decided to take no further action on the proposal as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery."

What Happened?

At the CFEC hearing, CFEC asked that the hearing not be about Proposal 126,¹ Allowing Sitka seiners the choice to do open pounding spawn on kelp instead of seining herring. We knew proposal 126 was not suppose to be the issue. We did not send the CFEC any information on the proposal nor did we feel and pressure to fight for our proposal because CFEC was not going to consider it in determining the area change. Testimony proceeded and as Mr. Twomley explains in his letter of January 8, 2016 to the Board of Fisheries "Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders."²

We believe the CFEC should have acted as Mr. Twomley states "We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 – Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries."³

We believe the CFEC overlapping the areas was arbitrary and caprices. Mr. Twomley states "And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that."⁴ Commissioner Carl Rosier memorandum "The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all

¹ This fact is in the transcript of the CFEC Sitka Sound hearing Bruce Twomley: page 2, "Now proposal 126 is not at issue", page 3 "But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126"

² Twomley letter to Board of Fisheries, January 8, 2016

³ CFEC Sitka Sound hearing Bruce Twomley: page 3

⁴ CFEC Sitka Sound hearing Bruce Twomley: page 3, p3



of Southeast Alaska, or two smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock”⁵ The CFEC chose the larger area.

We thought the CFEC hearing would be about the area definitions and why the overlap. Questions should have been:

1. Sitka roe herring fishery was the first limited fishery. The Northern Southeast herring spawn on kelp fishery was later. Was it right to overlap the areas? Mr. Twomley states “And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute.”⁶
2. Do the areas defined represent the actual fisheries going on?
3. Does the Sitka herring roe seine permittee have the right to harvest the roe herring eggs?
4. Does the permit holder have a right to harvest the fish or does the gear?
5. Who has the right to the biomass, the permit holder that fishes the biomass or the gear holder in another area?

The Board needs to go forward with our proposal allowing the Sitka Seine permit holder the opportunity to harvest their share of the herring resource with open pounds instead of purse seine. Indeed the CFEC states “If however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fishermen would be consistent with the Limited Entry Act.”⁷ We are not asking the Board of Fisheries to allow more effort into the Sitka roe herring fishery. We are asking the Board to allow those already in the fishery to use a different method to harvest their share of the resource. Please write the CFEC a letter requesting the CFEC to separate the Sitka Roe Herring area from the Northern Southeast herring spawn on kelp area.

Best regards,

Darrell Kapp

⁵ Twomley letter to Board of Fisheries, January 8,2016

⁶ CFEC Sitka Sound hearing Bruce Twomley: page 3, p4

⁷ Twomley letter to Board of Fisheries, January 8,2016



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

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January 8, 2016

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

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As I indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

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smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you and have any questions regarding this matter.

Yours Truly,
Commercial Fisheries Entry Commission



Bruce Twomley, Chairman
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)
Sitka Tribe of Alaska
Southeast Alaska Seiners Association



CFEC SITKA SOUND PURPOSED REG.

**Moderator: Bruce Twomley
November 6, 2015
7:51 pm CT**

Operator: Ladies and gentlemen thank you for standing by. Welcome to the CFEC Sitka Sound Purposed Reg conference call.

During the presentation all participants will be in listen-only mode. Afterwards we will conduct a question and answer session. At that time if you have a question please press the 1 followed by the 4 on your telephone. If at any time during the conference you need to reach an operator please press star 0. As a reminder this conference is being recorded Friday November 6, 2015.

I would now like to turn the conference over to Bruce Twomley. Please go ahead sir.

Bruce Twomley: Thank you operator (Kalimer). This is Bruce Twomley and I'm the Chairman of the Commercial Fisheries Entry Commission. We are in the conference room of the Commission's offices in Juneau. As you noted it's Friday, November 6, 2015 and the time is 3:00 p.m.



This is a public hearing on CFEC's regulatory proposal to modify CFEC's administrative area definition for the Northern Southeast herring spawn-on-kelp pound fishery.

Now I'd like to introduce fellow staff members sitting here with me. I have my Co-Commissioner (Benjamin Brown). We have our Law Specialist (Doug Rickey) and we have Head of our Research (Craig Farrington). And we are the folks in response to your testimony who are likely to be asking you questions. And so as we go forward if someone has a question if you'd just get my attention I'll acknowledge you for the record and so they know who's speaking.

Also before we begin I really want to extend a thank you to (Randy Lippert), (David Pierce), and (Ty McMichael) for helping make this work. You guys have done a splendid job. And we are also grateful to GCI and particularly (Julie Pierce) who has helped us through this process.

Now before we begin taking testimony I wanted to say just a few words about the procedure and our regulatory proposal to remove Sitka Sound from our administrative area of definition for the Northern Southeast herring spawn-on-kelp pound fishery. I mean, as you know, earlier board proposal 126 asked the Board of Fisheries to authorize open pounding as an alternative means for the Sitka Sound roe herring fishery.

Now proposal 126 is not at issue in this proceeding but it certainly was the catalyst for this proceeding and our proposal - the trigger that led to this hearing. And you'll notice that CFEC's proposal in front of you says nothing about proposal 126. Our proposal addresses only our area definition. And I wanted to tell you that we made this proposal for two reasons. And the first is that we were asked to do so by the Board of Fish and by the Department of



Law. And that's unusual but that request had a certain amount of force. We like to be good colleagues and cooperate where we can. But there's a second reason and that's actually what prepared us forward to make this proposal.

We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 - Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries. And it further says that the Commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of the Limited Entry Act.

So, I mean, for us the question that was raised was why did we define the area for Northern (rolunt) kelp to include Siska Sound in the first place. And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that. And of course the managers of Sitka Sound have never told us that they wanted to invite more participants in that fishery. It seems that there are plenty of demands there now.

And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute. We just didn't have a stated reason for having included Sitka Sound in that definition. And so we made this proposal and maybe you folks through your testimony can provide us with a sound reason for maintaining the definition or maybe not. It will - much of that will turn on your testimony.

But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126. And please note that however - whichever way CFEC decides on our proposal the Board of Fisheries could still take up proposal 126. And if the Board were to act favorably on proposal 126 then



CFEC would have to review the Board's action for consideration of whether the Board's action was consistent with the purposes of the Limited Entry Act under Alaska Statute 16.43.4112. And the basic purposes for a Limited Entry that we'd have to have in mind are that Limited Entry is intended to serve conservation and prevent economic distress among fishermen and those depended upon them for a livelihood. That's the most basic standard we work with.

And another thing to keep in mind is that the Board has means and methods authority under Alaska Statute 16.05.251. In turn, the Limited Entry Act governing us Alaska Statute 16.43.950 declares -- and I'm paraphrasing -- nothing in the Limited Entry Act limits the powers of the Board of Fisheries including the power to determine the legal types of gear.

So the short of this proceeding is if the Board in the future acts favorably on Proposal 126 the Board's action will need to come back to CFEC and CFEC will have to determine whether the Board's action is consistent with the purposes of the Limited Entry Act to give it effect.

And so that's when CFEC will be called upon to address the merits. If this does come back to us of course you will all get notice -- anyone interested will get notice -- and have an opportunity to address the merits as well.

So I think we're ready to move forward with your testimony. And if you have questions I'd like you to raise the questions while you are testifying. And we're going to start first with a testimony of people who have traveled here and who are here in this room to testify to us. When we get through your testimony then we'll turn to the people who are lined up on the phone to give their testimony.



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

Re; Support for Proposal 112, Management of the Herring Row on Kelp Fishery in SE Alaska

Dear Chairman Jensen and Board of Fisheries Members,

Harvest from the resource based on kelp blades is not accurate and allows overharvest. It's a guess at best.

Kelp blades come in all sizes and shapes. Herring lay their eggs in different densities when spawning. Thus the measurement of extraction from the resource is not measurable using the number of kelp blades. The weight of herring spawn on kelp is a measurable metric.

The Alaska Department of Fish and Game did a study in Sitka and determined the percentage of harvest based on weight that represents the extraction from the herring biomass. This study was based upon the open pound experimental fishery conducted in 1998 & 1999. The regulations should now use weight, in the open pound fishery, as the determining factor for herring spawn on kelp harvest, not the number of blades.

Alaska had herring pound fisheries in many areas. All the areas were using the method of closed pounding. Today the biomass in all those areas, except one, is not sufficient to support a fishery. Only in Craig/Klawock is the fishery still going and the Department has tried to limit the pounds to 20, in 2017, because of the lack of the herring resource. Closed pounding is not the way to harvest herring spawn on kelp. Until a determination can be made of what the extraction from the resource is in the closed pound fishery, based upon weight, that method should be stopped.

Best Regards,
Darrell Kapp



Submitted By
Dave Gordon
Submitted On
12/28/2017 4:24:19 PM
Affiliation
Self

I am opposed to proposal 159 to ban spotter planes during open periods in the southeast salmon purse seine fishery. I am not aware of any widespread use of aircraft for the purpose of facilitating illegal harvest. If there is a spotter or two that are facilitating illegal activity they are a very small minority. On the contrary I believe that spotters likely deter illegal activity since most spotters, if they witness fishing in closed waters, might just as likely document and report illegal activity to the troopers.

The Southeast Alaska purse seine fishery area is a vast area with openings from Northern Chatham to Dixon Entrance. Seiners simply cannot afford the time to assess their best prospect for an opening. But even on a smaller scale, such as during an opening, spotters help seiners find open areas nearby where effort is light or nonexistent with surplus fish that might otherwise go unharvested and can have the added positive effect of reducing effort in over-crowded areas. One might think that flying the day before an opening is adequate but the picture can change dramatically hour to hour depending on the wind, tide, run timing or shifting effort.

Thank you for the opportunity to comment



Submitted By
David Benitz
Submitted On
12/26/2017 8:55:36 PM
Affiliation

I am writing in to voice my support for proposal 235. I have been involved with this fishery as a permit holder/boat owner since 1998. Before that I started crewing at the age of 12 on my grandfather's dungeness boat. I have some experience with this fishery. The current Southeastern Alaska Area Dungeness Crab Fishery Management Plan is flawed and not necessary. In 2013 the F&G closed the season a week early. There was very little effort that summer with most boats targeting salmon. Where I was fishing the stocks were very good. I was having one of the best seasons of my life. Lots of crab and no boats. At a minimum the early closure cost me 10,000 lbs and I was getting \$2.50 per lb that summer. 2017 was a disaster for me. Not for lack of crab but for the lack of fishing time. I have a small boat and do not require a large amount of crab to make a good living especially when the price is near \$3.00 per pound. What I do need is the four month season to make a living. Dungeness is my only fishery and I would like to keep it that way. The 3-S system that was in place prior to 2000 was working just fine and will still work today. Please take the time to seriously consider passing proposal 235. Thank You David Benitz



Submitted By
David klepser
Submitted On
12/27/2017 11:26:49 AM
Affiliation
Commercial fisherman

Phone
907-617-5148
Email
Boondockdave@live.com
Address
PO Box 8946..... mailings
5392 Densley Drphysical
Ketchikan , Alaska 99901

Hello and thank you. My name is David Klepser I'm a life long Alaskan born and raised in Ketchikan. Commercial fishing is my life I've been doing it since 1977. These proposals will have significant hardship and costs.

Proposal 79 I oppose this

And should not be approved this has been thru B O F many times and there is not a clear scientific gain to this. A dead shrimp is a dead shrimp whether it is before it can have any eggs, no chance to hatch any eggs, or a chance to hatch some eggs. With the length of our fishery there is no advantage to this proposal. Citing another country's regulations does not make it right for another country, just because someone else is doing it doesn't make it right for us.

Proposal 80. I oppose this

Adfg knows how many pots are in the water and they calculate by cpue's pots fished. This proposal is by design to make everyone just as inefficient as the proposer. This is about being vested in a fishery and being able to compete, just because he doesn't want to be effective in his operation doesn't mean I should to.

Proposal 81. I oppose this.

I've fished shrimp for 32 yrs. this has been before the board before and has not passed. It adds adverse gear restrictions that not all could comply with. It adds substantial record keeping and logs that would be burdensome and time consuming in an already time restricted fishery. It would have a significant cost to fishermen to participate it could make things even more dangerous with gear implications. We already report to adfg pot lifts and cpue's within existing regulations. Soak times don't regulate shrimp size and citing another country's rules does not make it the right way.

Proposal 82...83...84 I'm opposed.

These all are "not in my backyard" proposals and reallocate.

Proposal 153 I oppose

This should have been withdrawn. The gill net fleet in district 1 does not dictate seine opportunity in district 1. On the contrary the seine opportunity does.

Proposal 154...169. I support

Proposal 148 I oppose

Gives sport / charter more access to kings, while trollers who paid for these fish are cut out. This is re-allocative and a fish grab.

Proposal 140 I oppose

This is just another fish grab by the seiners at the expense of other user groups. It would give seiners complete access to 2 of the 3 tha's in southern southeast. It is allocative and would have a negative effect on the gillnet fleet. The seiners are grabbing as much as they can because they know the next time the board meets they will be in or over their range with new chum productions that are starting to enter the fisheries.

Proposal 145. I oppose

This is another fish grab by the seiners and would be devastating to the gillnet fleet. Naket is the only gillnet only tha in southern southeast. The seine fleet has received in part or in whole all of ssraa increases in chum production for the last 15 years. The ssraa board of directors made this a gillnet only and paid the seiners with increased production for their offset. The rule that they'd only fish once a week is trivial as the seiners would only need one or two days to harvest the whole return and leave nothing for the gillnet fleet. I was there when they did this at Naket. seiners harvested close to 3.5 million lbs in one day at Neets Bay. All this seine grab for fish is happening because

they know come next board cycle they will be in their range if not over it . Naket is and should still remain gillnet only regardless of PC043 allocation . Seiners signed off on the new production increases for them and none for Gillnet. Thank you for your service to this great state . Sincerely yours David Klepser Ketchikan Alaska 99901 907-617-5148





Submitted By
David Landis
Submitted On
12/28/2017 11:42:39 AM
Affiliation
Self

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Ketchikan, Alaska 99901

Chairman Jensen and members of the Board of Fisheries,

Thank you for the opportunity to make public comment. I am a resident of the State of Alaska and have actively participated in sport, commercial and personal use fisheries here since my youth in the early 1970s.

My remarks are regarding the *DRAFT: McDonald Lake Sockeye Salmon Stock Status and Action Plan, 2018*.

I have participated in the personal use gillnet fishery in Yes Bay fishing for McDonald sockeye nearly every year for approximately the past 15 summers. It is a tremendously enjoyable activity for myself and my sons, who look forward each year to our Yes Bay trip. Sometimes we have done well catching sockeye, sometimes not so well, but we always enjoy getting out.

The point I would like to make is that even though I very much value this fishery and it's been part of my life for many years, I don't think that the McDonald Action Plan Action #2 Personal Use Fishery goes far enough with the two options (A and B) presented. **I believe that there should be an Option C that suspends personal use altogether while there is a stock of concern.** My reasoning follows:

- 1. These are 100% brood fish.** This is the last stop before making it up Wolverine Creek and into McDonald Lake. This is the last chance to make escapement, and we're going to allow people to harvest virtually at the mouth of the stream? It makes no sense when the stock is as weak as it is currently. Every fish taken in this fishery leaves fewer eggs in the gravel upstream - guaranteed.
- 2. This is not the highest and best use for these fish.** Commercial fishers in Districts 1, 2, 6 and perhaps others may be restricted on fishing time and area as a result of the McDonald Lake management concerns. To reduce fishing time and area for other targeted species and stocks, both wild and enhanced as a result of potential McDonald sockeye interception is a poor use of the resource. There is far more impact to these fishers' livelihoods in the balance than the loss of a small personal use fishery at Yes Bay.
- 3. This is not a necessary personal use fishery.** I am very familiar with the local residents who utilize this fishery, and for the most part they are not feeding themselves hand-to-mouth with these fish as a critical food source. Although some might view it differently, I submit to you that this is a hobby fishery and a luxury at that. It takes a certain means to get to Yes Bay and set a personal use net for several days running, and on a cost-per-pound basis these are actually very expensive fish for the average person. I agree wholeheartedly that there should be places for personal use fishing by those who it impacts the most, and who really need it, but this is not that kind of a fishery in my opinion.

Again, thank you for the opportunity to make these comments, and good luck with your meeting.



Alaska State Board of Fisheries – 2018 – SE Finfish
Comments submitted by Deborah Lyons, 12-28-2017

Dear Members of the Board of Fisheries,

I respectfully submit these comments for your consideration. There are 4 comments and they are organized by topic according to the regulatory authority of the Board. I have great respect for the Alaska Department of Fish and Game and especially praise the ADFG staff that serve on the Chinook Technical Committee in Pacific Salmon Commission process, as well as the many other technical and management personnel that work in the Pacific Salmon Treaty arena, as well as in the day-to day-management of SE Alaska fisheries. The Treaty is a hostile, contentious, and demoralizingly depressing process at times, and all of the Alaska participants, ADF&G staff, the industry panels, and committee members have shown admirable loyalty and stick-to-it-ness in the most trying circumstances. The comments I offer are meant to be supportive and constructive.

My name is Deborah Lyons, my husband David is retired from longlining and trolling. David was born in Petersburg but we have lived in Sitka since 1988. We own the troller/long liner F/V Kraken. I fished with David for fourteen years, from 1985 – the year Alaska entered into the US Canada Salmon Treaty - until 1999, the year the first ten year annex to the Treaty was signed, when the change to abundance based management was made.

I served as a member of the Board of Fisheries from January of 1990 to April of 1993. During that time the Board modified 47.145.055 the SE AK King Salmon Management plan and 5AAC. 29.060 Allocation of King Salmon in SE and Yakutat Areas. The Allocation plan was based on the annual number of Chinook available as determined under the sharing arrangements of the US-Canada Treaty. I was the Pacific Salmon Commission Northern Panel member representing trollers from 1995 through 1999. I was the Executive Director of the Pacific Salmon Treaty Coalition Public Relations and Education Committee from 1996 through 2000. I was the Executive Director for the resurrected Pacific Salmon Treaty Coalition from Jan 2016 through October 2017. I am currently the Secretary/Treasurer of the NSRAA Board of Directors and have served on that Board since 1995. I am currently the Executive Director of the Chinook Futures Coalition.

Comment Topic #1 - Mark-Selective Fisheries on Hatchery Chinook salmon in the waters of Southeast Alaska during summer troll fishery. Page 2

Comment Topic #2 - 2017 ADF&G Treaty Commissioner’s decision to eliminate the harvest of 30% of the summer troll quota, approximately 31,000 Chinook salmon. ... Page 4

Comment Topic # 3 – Delay the opening of the summer troll fishery from July 1 to Jul 8. Weigh impacts on ADF&G ability to develop in-season verification of pre-season abundance estimate.Page 12

Comment Topic # 4 – The cumulative affects of reducing troll Chinook effort in spring and winter troll fisheries may generate (20,000 to 40,000 estimate) of Chinook available to be harvested in the summer troll fishery. Will the allocation goals be met?Page 13



Comment topic #1:

Mark-Selective Fisheries on Hatchery Chinook salmon in the waters of Southeast Alaska

Regulatory Authority of the Board of Fisheries:

Title 5 of the Alaska Administrative Code

- I. "Alaska Salmon Hatchery and Enhancement Regulations Chapter 40. Private Nonprofit Salmon Hatcheries 5 AAC 40.005. General
 - (a) The harvest of salmon inhabiting the water of the state, regardless of whether the salmon are naturally or artificially propagated, may be conducted only pursuant to regulations adopted by the Board of Fisheries."

Comment:

Dear Members of the Alaska State Board of Fisheries,

No Proposal in the Boardbook - I am very troubled by the fact that the ADF&G conducted mark-selective fisheries (MSF) targeting Alaska and non-Alaska origin hatchery salmon in Southeast Alaska power troll fishery for two years (2015 & 2016) prior to the SE Finfish meeting, but the ADF&G did not submit proposals to the Board of Fisheries. Therefore, this new and controversial type of management in the Chinook fisheries is not subject to scrutiny by the BoF and further analysis from the ADF&G. Fishermen have concerns about the practice of mark-selective fisheries and have been deprived of their opportunity to share their experiences with the program with the Board of Fisheries through the standard Board process. There is no public notice about the mark selective fisheries; Advisor Committees have not been notified to review and debate the programs and to submit their comments to the BoF. The Aquaculture Associations could be impacted because they would be the ones that would have to mass mark their Chinook salmon production (remove the adipose fin of all Chinook fry prior to release). The AA's have not been able to participate in a discussion of whether these programs are economically and/or practically feasible at their facilities.

These MSF fisheries were not incorporated as part of the 2016 SE AK Summer Troll fisher management plan but were conducted under some sort of EO authority...I am not sure exactly what type of authority was granted to the Commissioner. The decision to conduct the MSF was not made at the level of the regional manager but from the Commissioner's office. Then, in 2017, the intention to conduct mark selective fisheries is stated within the SEAK Summer Troll Fisheries Management Plan. and a fishery targeting marked Chinook was allowed after the directed fishery for king salmon in July was closed. So, for a time during the directed 2017 Coho fishery, the retention of fin clipped king salmon was allowed. Clearly the ADF&G is anticipating that there may be some useful application of the MSF in the summer troll fishery. Why then did the Commissioner's office neglect to publish a proposal for review?

Abrogation of the State's management authority - Chapter 3, the Chinook Chapter of the Pacific Salmon Treaty, paragraph 5, Section 3 on page 65 explains the relationship of the international Treaty agreement with fisheries managed by the State of Alaska. "(c) mark-selective fisheries implemented by either Party that affect stocks subject to the Pacific



Salmon Treaty will be sampled, monitored and reported in accordance with applicable protocols recommended by the Selective Fisheries Evaluation Committee and adopted by the Commission; and the SFEC will facilitate the annual exchange of information regarding the conduct of mark-selective fisheries, including estimates of catches of mass-marked hatchery Chinook.” In other words the Treaty requires that if a party to the Treaty chooses to implement MSF, reports and evaluation of impacts on Chinook salmon stocks subject to the treaty must be made to the SFEC. My concern is that some of the current ADF&G PSC negotiating team may believe that MSF and mass marking programs are conducted under the authority of the Salmon Commission rather than the BoF, and can be adopted into SEAK fisheries management by incorporating MSF into the Treaty negotiations. If it is agreed at the Treaty talks that Alaska will be part of a coast wide mass marking and mark-selective fisheries program, then Alaska would have to adopt these fisheries and programs to complete our part of the bargain to reach an agreement at the Treaty. This seems very wrong to me, like the cart is in front of the horse.

Why would the State of Alaska agree to take part in a Treaty that sidesteps our legislatively mandated regulatory process? Back in the late 90’s the philosophy and posture of the Alaska Treaty negotiators was; “We are working within the Pacific Salmon Commission with the support and involvement of the Alaska fishing industry representatives, to get the best allocation of fish possible to the State.” In the case of Chinook, once the annual allocation of Chinook is determined through the Treaty Chinook Technical Committee, that number of fish goes to the State domestic regulatory authority; the Board of Fisheries. The Board of Fisheries decides how the All-gear Chinook Quota is allocated among the user groups, through the various allocation and management plans. The State negotiators, in those days, vigorously resisted attempts by other entities to interfere with the State management under the Board of Fish. And certain parties to the Treaty were proposing mark-selective fisheries for application in Alaska at that time as well. The Pacific Salmon Commission process recommends a number of Chinook to be harvested by Alaska but is up to the State process to distribute the harvest according to the State’s conservation and management goals. In Washington and Oregon the amount of Chinook allocated under the Treaty is divided in the Pacific Management Council process and then further regulated by the States and Tribes. The Canadian Department of Fisheries and Oceans in communication with the managers in British Columbia also insist that once the Chinook number is decided that they are allowed to conduct fisheries to meet domestic allocation and conservation objectives.

Dear Board of Fisheries members, I hope you thoroughly investigate the question of the State’s management authority with respect to the US/Canada Treaty, and provide appropriate guidance and clarification on the issue.

Comment topic #2: 2017 ADF&G Commissioner’s decision to depart from the Summer Troll Fishery Management Plan and to eliminate the harvest of 30% of the summer troll quota, approximately 31,000 Chinook salmon.



Regulatory Authority of the Board of Fisheries:

State of Alaska Administrative Code, Title 5, Chapter 29 Salmon Troll Fishery.

Comment:

Dear Members of the Alaska State Board of Fisheries,

An exceptional action was taken in the Summer Troll fishery in 2017 and was announced to the public in the following Press Release:

August 7, 2017, JUNEAU — Due to poor ocean survival conditions for Chinook (king) salmon, which are persisting in Southeast Alaska and British Columbia, extreme management measures are necessary to restrict harvests in coast wide fisheries that are directed at stocks originating in Southeast Alaska, Northern British Columbia, the Fraser River, and the Washington Coast.

In season information from ADF&G, the Canadian Department of Fisheries and Oceans, and NOAA surveys off the coast of Oregon, Washington, and the Gulf of Alaska all indicate that poor production conditions are currently occurring and will persist through at least 2018. In particular, Southeast Alaska and British Columbia stocks are experiencing historically low production; many of the affected stocks will not meet escapement goals or management objectives in 2017.

The in season data and stock specific information cannot be ignored when conservation of wild stocks is the foundation of the Alaska Sustainable Salmon Fisheries Policy and the Pacific Salmon Treaty. Therefore, it is imperative that Alaska offer relief now for these stocks, with a focus on protecting future production.

Although it is a very difficult decision to make, retention of Chinook salmon will cease at 12:01am, Thursday, August 10, 2017, in the Southeast Alaska recreational and commercial fisheries and non-retention will continue through September. Information on the status of stocks is still being collected and will inform management decisions beyond the September time frame.

Fishermen, processors and the public were shocked to hear conditions were so dire that these extraordinary actions were required, but generally commercial and recreational fishermen accepted that if the ADF&G said a closure was needed there must be a rationalization that would justify the action. Trust in the integrity of the ADF&G was high. Nevertheless fishermen familiar with the life cycle of the SEAK King salmon systems were puzzled. The smaller SE AK King salmon systems like the Unuk and Chilkat are surveyed for peak escapements August 15th. Spawning fish returning to these systems were already in the rivers and would not be present in any significant amount in the August Troll fishery. After being pressed to provide a more detailed rationalization for the closure the Commissioner's office issued the following statement. I have five main concerns with the Commissioner's rationalization to bring to your attention. The bold italicized quotes are from the body of the Commissioners August 18th rationalization for the closure. Briefly, they are as follows:



(1) Provided below are current 2017 spawning escapement assessments for the 11 Chinook salmon index systems in Southeast Alaska.

There is no doubt escapements are very low but the ADF&G action of closing the Augus fishery troll fishery infers some significant contribution to the escapements of the listed AK systems and that escapements would improve. However, an analysis of the benefits of the closure to the SEAK systems has not been published by the ADFG, and independent analysis has shown very little benefit in terms of number of spawners saved that accrued to the SEAK systems. In other words the closure did not provide any substantial benefits to the SEAK systems. The closure resulted in a foregone harvest of 31,000 Chinook valued at over \$3.5 million dollars ex vessel, \$6 Million dollars first wholesale and even greater when economic multipliers are factored in. (Informal Seafood Producers Cooperative preliminary estimate) Furthermore, the 8-18-17 rationalization refers to the State of Alaska Policy for the Management of Sustainable Salmon Fisheries. The ADFG knew a BoF workshop was scheduled for October to decide if SEAK stocks met the criteria for a stock of concern. From my point of view, as a member of the public, and from the point of view of many troller, fishermen would have preferred that the SSFP policy proceed as written. First a determination is made, and then an action plan is developed in an open public process. Instead the ADFG pre-empted the SSFP process.

(2) Provided below is current 2017 abundance information for Chinook salmon that return to Northern British Columbia and the Fraser River.

Low escapements to Canadian Rivers are cited, as if Alaska has a conservation responsibility to those systems in addition to what has already been provided to Canada through reductions already made to the amount of king salmon available for harvest in SE Alaska in 2017.

Did you know that the amount of King salmon available to be harvested in Southeast Alaska is set each year according to a table and formula developed by the Pacific Salmon Commission and the Treaty process? For 2017 the SE Alaska All-gear Treaty Quota was 209,700 King salmon. The formula used to set that number predicts King salmon abundance through the use of an Abundance Index (AI). For 2017 the AI was 1.27. In other words, king salmon were estimated to be 27% more abundant in 2017 than in the period before the Treaty was signed. (1979-1982)

Most people know that most of the king salmon caught in Southeast Alaska are not fish returning to Alaska streams but are king salmon returning to rivers in Canada and Washington. When Alaska entered into the Treaty to help rebuild king salmon the State agreed to reduce Southeast Alaska historic harvest share by about 20%. During the early years of the Treaty, from 85-99, Alaska's harvest was a fixed number and was called the "ceiling fishery".

In 1999 a change to abundance-based management was made and the State Treaty negotiators agreed to an even greater reduction in harvest share. The new formula calculates harvest share on a sliding scale. The minimum reduction in year of greatest abundance is 45%. In years of lowest abundance the reduction is 63% from our historic share of the coast wide king salmon harvest. **In 2017 the number of king salmon**



allocated to SE Alaska (209,700) represents a 49% reduction in harvest share of king salmon.

When the PSC moved to abundance-based management the Alaska (AABM) Aggregate Abundance Based Management reduction in harvest would now fulfill Alaska's obligation to contribute to conservation for the other Canadian and Southern US fisheries. Once Alaska made its reduction in harvest, the responsibility to achieve escapements is the responsibility of the other more terminal fisheries adjacent the Nass, Skeena and Fraser. There was no request from Canada asking that Alaska eliminate the August fishery to provide additional conservation benefits to them. The fact that the Alaska Treaty Commissioner took it upon himself to arbitrarily decide to eliminate the harvest of 31,000 Treaty fish, when nothing in the Treaty required him to do so, is extremely disturbing.

(3) Genetic Stock Composition

Historic genetic-based stock composition data provide information for various aggregates of Chinook salmon stocks that have contributed to the harvest in Southeast Alaska in prior years...

(5) However, genetic stock composition estimates are available in-season for the Northern British Columbia summer troll fishery and information gathered in 2016 and 2017 suggests very large differences in these years...

The Commissioner cites recent genetic data from genetic sampling in Alaska and genetic stock identification from data gathered in the North British Columbia power troll fishery as if it is significant and warrants a change in Alaska's fisheries' management.

Stick with me Board members, it is late I am tired, (12:52 AM), comments are due tomorrow but this is really important.

The entire Southeast Alaska Sport and Commercial Chinook stock composition is of mixed stocks from Alaska, Canada, Washington and Oregon. This is not exactly a news release in and of itself!!! It is the reason why we are in an International Treaty.

"The Government of the United States of America and the Government of Canada, Considering the interests of both Parties in the conservation and rational management of Pacific salmon stocks and in the promotion of optimum production of such stocks; Recognizing that States in whose waters salmon stocks originate have the primary interest in and responsibility for such stocks; Recognizing that salmon originating in the waters of each Party are intercepted in substantial numbers by the nationals and vessels of the other Party, and that the management of stocks subject to interception is a matter of common concern; Desiring to cooperate in the management, research and enhancement of Pacific salmon stocks; Have agreed as follows:"

And we were off to the races in 1985!



Alaska has been in the Treaty since 1985. During how many years did the stock composition change? The correct answer is, "It changes every year." With periods when the Columbia River stocks dominate, but that changes to West Coast of Vancouver Island stocks, or maybe Thompson stocks because of the hatchery programs. Just as some stocks are more present (Stronger) and other stocks less present (Weaker) the one constant is that the composition will change. Hence the concept that the Alaska Chinook All-gear quota that comes from the Treaty is based on Aggregate Abundance of Stocks...how could it be otherwise? SEAK Chinook Stock composition is not a pie, it is a mosaic seen through a kaleidoscope and it changes each time you look at it.

Canada also receives Treaty Chinook quotas based on the Aggregate Abundance of stocks. Different from Alaska, Canada North British Columbia management has gone way down the road of shaping the Canadian troll fishery to harvest or avoid harvesting their own stocks, while at the same time "attempting to harvest the (Treaty) allocation". Canadian trollers also own Individual Transferable Quota shares of Chinook and can harvest them in various areas of Northern and Southern BC at various times.

Check out the report on the PSC website above. The title is, "Genetic Stock Identification of Chinook Salmon caught in Northern British Columbia Troll Fisheries 2016"

<http://www.psc.org/publications/fund-backgrounders-final-reports/#449-information>

Is there a problem with Canada moving their troll fleet hither and yon based on scale samples in season? Not really. That is their domestic management choice to achieve allocation and conservation goals.

When the 1999 Treaty Chapter 3 on Chinook Management changed from ceiling to abundance-based management occurred some important supporting agreements and understandings accompanied the change in management.

- 1.) Alaska agreed to increase the reduction in historic harvest share of coastwise Chinook from 20%, as under the ceiling fisheries, to a sliding scale of 30% reduction in highest abundance years to 45% reduction in lowest abundance years. In 2008 the State agreed to (was forced to accept) an additional across-the-board reduction of 15% to the State's historic harvest share. Aggregate Abundance Based Management (AABM)
- 2.) The more terminal fisheries in CA, WA and OR agreed that they would be responsible to achieve MSY escapement goals for Chinook indicator stocks, even if they had to take a reduction even greater than the 35% harvest reduction, they had previously agreed to. Individual Stock Based Management (ISBM)

Therefore the AABM and ISBM had clear responsibilities to provide benefits for the rebuilding programs: AABM's donate fish to escapements and ISBM's manage terminal fisheries to achieve escapements. They would operate independently, each satisfying their "Treaty obligation".

- 3.) To help settle Canadian Equity claims and to enshrine the new understanding to stop the squabbling between the ISBM and AABM sibling fisheries, the US Government gave



\$170 Million dollars to establish the Northern Fund (\$75M) and the Southern Fund (\$65M). Canada could apply to each, Alaska to the N Fund and WA/OR to S Fund.

“The Pacific Salmon Commission oversees two Endowment Funds established in 1999 to support projects in Canada and the United States that develop improve information for resource management; rehabilitate and restore marine and freshwater salmon habitats; and, enhance wild stock production through low technology techniques.”

- 4.) The 1999 agreement met the standard of a “No Jeopardy” finding from NMFS and the threat of fisheries closures under the ESA was extinguished
- 5.) North –South sharing and legal threats under US vs. WA and Baldrige were held in abeyance.

So then we had peace. That lasted 10 years.

In 2008 an additional 15% was wrested from AK. NMFS and the Tribes rattled their sabers once again about ESA closures and possible Tribal legal actions against Alaska. A argumen could have been made that the N Fund and S Fund should revert to the Treasury if the 1999 Agreement was substantially altered. Federal funding is like crack cocaine and Alaska did not have any presence in WA DC for the AK negotiation team and the AK Congressional Delegation had lost influence after the death of Senator Stevens. On October 6, 2016 the Alaska Treaty team resumed their communications with the Alaska Congressional Delegation who wrote the State Department and Department of Interior a 10-page letter detailing Alaska’s problems with the 2008 agreement; the reallocation of Alaska’s 15% reduction to harvest in other fisheries rather than to escapements, current problems with the Chinook model, misbehavior by NMFS at the Treaty, etc. The ADF&G did an excellent job of documenting Alaska’s concerns in that document.

Here we are today, 18 years after the 1999 Agreement. The Genetic Stock Identification (GSI) data paid for by the Northern Fund and the Alaska stock GSI data paid for, in part, by the Northern Fund are being used by Alaskan scientists and Treaty Commissioners to justify further reductions in the Alaska share of the Coastwise Chinook harvest because we have forgotten the basic understanding that Alaska’s huge reduction in historic harvest share (49%) satisfies Alaska’s Treaty obligations.

Senator Stevens would roll over in his grave and those of us that labored the four tumultuous years to get the 1999 agreement feel like jumping off a bridge... For what? It appears we have lost our compass and our rudder! It should be noted that Chapter Three does anticipate and provide an additional mechanism to reduce AK AABM harvests if ISBM stocks fall chronically short of escapements. In order to further reduce AK harvest share the “weak stock gates” must be met. However this rather rigorous standard and criteria was not applied prior to the action being taken to close the August fishery.

Finally:

(4) when this retention period was allowed to take place.



This little sentence really bugs me...Should not it read, "When the 2nd retention period occurred according to the direction provided by the BoF in the Southeast Summer Troll Fishery Management Plan?"

Dear Board of Fisheries members, thank you for slogging through this long comment. The complete rationalization by the Treaty Commissioner, published in the ADF&G Press Release of August 18, 2017 is reproduced below for your reference.

BASIS FOR THE SOUTHEAST ALASKA CLOSURE TO CHINOOK SALMON RETENTION

August 18, 2017

The following is a summary of considerations associated with the management of Southeast Alaska Chinook salmon fisheries in August 2017. Factual information considered includes numeric and compositional stock specific assessment data, fishery stock composition data from genetics, and NOAA juvenile surveys. Relevant obligations under the State of Alaska Policy for the Management of Sustainable Salmon Fisheries and the International Pacific Salmon Treaty (PST) were considered. Further, there was consideration taken for any spring-run Chinook salmon stocks such as those that spawn in Southeast Alaska that would be harvested in August and September of 2017 and are potentially components of the 2018 and 2019 spawning runs.

Stock-Specific Escapement Assessments

Preliminary spawning escapement estimates are available for 9 of the 11 Chinook salmon index systems in Southeast Alaska, for the Nass and Skeena rivers in Northern British Columbia, and for early run-timed stocks returning to the Fraser River. Abundance of these stocks in 2017 is very low, and for the Southeast Alaska stocks in particular, runs since 2016 are the worst on record. In 2016, of the 11 index systems in Southeast Alaska missed their respective spawning escapement goals. Preliminary information in 2017 suggests that 8 of 9 index systems surveyed to date in Southeast Alaska will miss their respective spawning escapement goals. At this time, Chinook salmon runs to Southeast Alaska streams are either the worst on record or on par with the disastrous runs seen in the mid-1970s.

(1) Provided below are current 2017 spawning escapement assessments for the 11 Chinook salmon index systems in Southeast Alaska. (Bold, numeral and italics added – DAL)

- Situk River – Count through Situk weir of 1,200 large Chinook salmon, above the upper bound spawning escapement goal of 1,050 fish.
- Alek River - Preliminary information suggests the spawning escapement will be below the lower bound of the goal.
- Chilkat River - Preliminary mark-recapture estimate is less than 1,200 large fish, well below the lower bound of the spawning escapement goal of 1,750 fish.
- Taku River - Preliminary mark-recapture estimate is around 7,000 large fish, less than half of the lower bound of the spawning escapement goal of 19,000 fish. All data suggests this will be the lowest escapement in over 40 years of detailed spawning escapement information, lower than the extremely poor runs seen in the mid-1970s.
- King Salmon River – Final spawning escapement is 85 large Chinook salmon, well below the lower bound of spawning escapement goal of 120 fish.
- Stikine River – Preliminary CPUE-based spawning escapement estimate is less than 10,000 large fish, well below the lower bound of the spawning escapement goal of 14,000 fish. All data suggests the lowest escapement in over 30 years and similar to the very poor runs seen in the mid-1970s.
- Chickamin River – Preliminary information suggests the spawning escapement will be below the lower bound of the goal.



- Unuk – Preliminary information suggests the spawning escapement will be below the lower bound of the goal.
 - Keta River – Spawning escapement information is gathered beginning in mid-August.
 - Blossom– Spawning escapement information is gathered beginning in mid-August.
- (2) Provided below is current 2017 abundance information for Chinook salmon that return to Northern British Columbia and the Fraser River.*** (Bold, numeral and italics added – DAL)
- Nass River– Fish wheel index program suggests the run is about 25% of the average seen by mid-August.
 - Skeena River– Tyee test fishery suggests the run is about 25% of the average seen by early August.
 - Fraser River– Albion test fishery information is the poorest ever observed and is a very small fraction of the historic average values seen by mid-August.

(3) Genetic Stock Composition

Historic genetic-based stock composition data provide information for various aggregates of Chinook salmon stocks that have contributed to the harvest in Southeast Alaska in prior years. (Bold, numeral and italics added – DAL) Average proportions of these data are provided in Figure 1 for the Southeast Alaska commercial troll fishery during the 2nd Chinook salmon retention periods from 2009 through 2016, ***(4) when this retention period was allowed to take place.*** (Bold, numeral and italics added – DAL) No 2nd retention period occurred in 2013 and 2015). When opened, the 2nd retention period typically occurred between mid-August and early September. Figure 2 provides similar information concerning average contributions of various aggregates of Chinook salmon stocks to the Southeast Alaska sport fishery operating from early July to early September along the outer coast (Outside Area) from 2009 to 2016.

Various natural and hatchery-origin Chinook salmon that originate in the Interior Columbia stock aggregate, the Oregon Coastal stock aggregate and the Washington Coast stock aggregate were the largest average contributors during the 2nd troll retention period in these years. Significant variation in contributions to SEAK fisheries occurs each year.

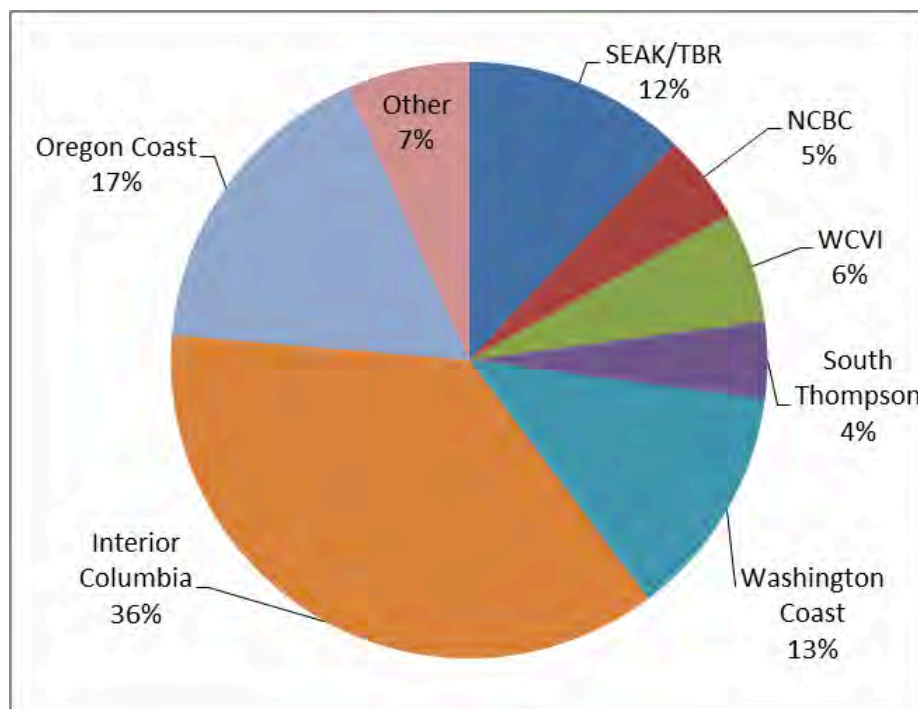


Figure 1 – Average proportional contributions of various aggregates of stocks to the Southeast Alaska commercial troll fishery during the 2nd Chinook salmon retention period, 2009-2016.

Estimates of contributions of stock aggregates to the Southeast Alaska fisheries based on genetic analyses are only available postseason so it is unknown if the stock composition of catches in July changed between 2016 and 2017. **(5) However, genetic stock composition estimates are available in-season for the Northern British Columbia summer troll fishery and information gathered in 2016 and 2017 suggests very large differences in these years** (Table 1). Postseason results from the Southeast Alaska commercial troll fishery catches in July 2016 mirror those seen in the Northern British Columbia summer troll fishery in 2016. These comparisons suggest that the stock composition in northern PST fisheries has changed markedly since 2016, particularly so for the Interior Columbia stock aggregate, which is half that seen in 2016, for the Oregon Coast stock aggregate that is again about half that of 2016, and for the South Thompson stock aggregate, a run component in the Fraser River, for which the proportion has doubled since 2016.

Table 1.- Comparison of genetic stock composition results for the Southeast Alaska and Northern British Columbia commercial troll fisheries in early July.

Stock Aggregate	SEAK Troll	NBC Troll	
	2016	2016	2017
Interior Columbia	45%	37%	15%
South Thompson	13%	19%	40%
Oregon Coast	18%	24%	13%
Washington Coast	6%	6%	7%
WCVI	4%	1%	3%

In the Southeast Alaska sport fishery from 2009 to 2016, as was the case in the commercial troll fishery, the Interior Columbia stock aggregate was a major contributor. Combined with two other stock aggregates (i.e., WCVI and Washington Coast), these stocks comprised most of the sport harvest during the early July to early September timeframe.

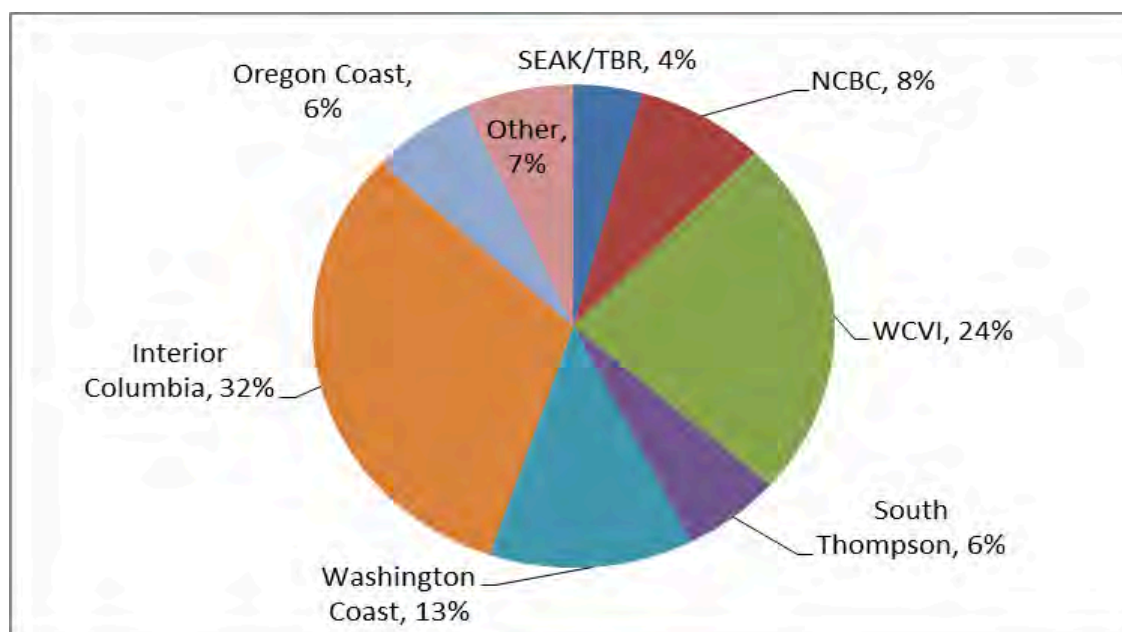


Figure 2.- Average stock composition in the Southeast Alaska sport fishery operating from early July through early September along the outer coast (Outside Area), 2009-2016.

Many of the stocks that contribute to the harvest in Southeast Alaska during August and September are fall-run stocks. As a result, at this time in 2017, it is too soon to fully evaluate the status of these stocks. In October stock status information for fall-run stocks will be available. Genetic-based stock composition information will be available for both the Southeast Alaska commercial troll and sport fisheries later this year.

Outlook for Southeast Alaska Chinook Salmon Stocks in 2018

For Southeast Alaska Chinook salmon, preliminary escapement information gathered in 2017 suggests the 2013 brood year is a failure in the Taku and Stikine rivers. Information from the other 9 indicator stocks is still being compiled, but at this time very few 4 year old (2013 brood year) Chinook salmon have been observed in any of the indicator stocks. A similar failure was seen in 2016 for the 2012 age class among most of the Southeast indicator stocks which prompted serious concerns for runs in 2017. By mid-September a more complete understanding on the outlook for 2018 will be available but at this time available information suggests the 2018 Chinook salmon runs in at least the Taku and Stikine rivers will be worse than those in 2017.

NOAA juvenile surveys

NOAA conducts annual trawl surveys off the coasts of Southeast Alaska, Washington and Oregon. Although the objectives of these surveys are not focused on Chinook salmon, all fish



species caught are identified and enumerated. Only a single juvenile Chinook was caught during the NOAA GOA survey off in Sitka in 2017; a typical low year would result in a catch of about 60 juvenile Chinook while a typical high year would be over 200. NOAA juvenile surveys off the coast of Washington and Oregon resulted in the lowest catches of juvenile Chinook since these surveys began. The warm water observed during 2016 oceanic surveys off of Southeast Alaska is still present, but is at a deeper depth in the water column.

Comment Topic # 3 – Delay the opening of the summer troll fishery from July 1 to July 8. Weigh impacts on ADF&G ability to develop in-season verification of pre-season abundance estimate.

Regulatory authority of the Board of Fisheries:

Chilkat River Action Plan (pg. 21). Option B, 2. Troll Fisheries:

- Summer Troll: delay the first retention period for king salmon during the general summer troll fishery by a week to target 70% of the remaining troll king salmon annual allocation, minus the number of treaty king salmon harvested in winter and spring troll, on July 8.

Comment:

Dear Board of Fisheries members

I am concerned that this action should not be taken without inquiring how it would affect the ADF&G ability to use the in-season CPUE data from the July 1 fishery as a way to verify the pre-season estimate of SEAK coast wide Chinook abundance. Once the fishery start date is changed you may be comparing apples to oranges. Currently the Pacific Salmon Technical Committee uses a mathematical model to generate the pre-season Abundance Index.

However, the model has been unreliable and inaccurate due to the poor quality of data supplied by some CA, WA, OR and Tribal fishery managers. On October 6, 2016 the ADF&G supplied information to the Alaska Congressional Delegation listing the State of Alaska’s concerns with how poorly the Treaty was functioning. The Congressional Delegation transmitted those concerns to NOAA Administrator Kathryn Sullivan, and US Department of State Deputy Assistant Secretary of State the Hon. Dave Bolton on October 6, 2016.

Excerpt from pages 3 and 4 of the letter.

- (2) the State of Alaska’s concerns regarding the practice of generating a pre-season estimate of Chinook abundance based on a model, which is used to set annual harvest limits. The model is used without any measures of uncertainty, recognition of observational data, nor any attempt at reconciliation of observational data with assumed model-based input by the CTC, and Alaska’s request to improve the process of setting harvest quotas by utilizing real-time, in-season abundance data from the Alaska fisheries to refine the pre-season abundance estimate; and

Could the Board of Fisheries please make inquiries about this before making a decision to delay the July 1 summer troll fishery start date? If the July fishery start date is changed the



State may lose a statistically significant data set that could potentially be used by the department as in-season verification of whether the preseason estimate is correct. Whether that preseason abundance estimate is developed from the model or from other data found valid by ADF&G.

Comment Topic # 4 – The cumulative affects of reducing troll Chinook effort in spring troll fisheries may generate a number (20,000 to 40,000 estimate) of Chinook available to be harvested in the summer troll fishery.

Regulatory authority of the Board of Fisheries:

5AAC. 29.060 Allocation of King Salmon in SE and Yakutat Areas.

5 AAC 39.222. Policy for the management of sustainable salmon fisheries

- Chilkat and Unuk Rivers Action Plans

Comment:

Dear Members of the Board of Fisheries,

Allocation. If the troll fishery is restricted from the harvest of king salmon in the spring and winter in order to protect Alaska origin King salmon it will reduce the number of Chinook harvested in the Spring troll fishery. Is there a problem with transferring those fish into the summer season so that the overall allocation objectives set by the Board of Fisheries is met for the troll fishery?

At an October 12th meeting to explain management actions under consideration by the ADF&G, with trollers in Juneau, department personnel expressed concern that Alaska ma come under some criticism at the Treaty if harvest impacts are shifted from winter and spring fisheries into the summer fishery. However, Canada has routinely shifted harvest times and areas for Chinook and maintains that the Treaty allows them the latitude to do so. Indeed a document by NOAA summarizing the understanding of the 2009 Treat agreement also confirms this flexibility.

“Chinook Salmon (Chapter 3): Because they pass through fisheries regulated by many jurisdictions in both Canada and the United States, Chinook salmon have been the focus of increasing concern and controversy in recent years. Although some Chinook populations are relatively healthy; others remain listed by the U.S. Federal Government under the Endangered Species Act (ESA). The new Chinook regime encompasses marine and certain freshwater fisheries in Alaska, Canada, Washington and Oregon. All Chinook fisheries will be managed based on abundance. Two types of fisheries have been designated:

- (1) Those that will be managed based on the aggregate abundance of Chinook salmon present in the fishery, and*
- (2) Those that will be managed based on the status of individual stocks or stock groups in the fishery.*



The 2008 agreement reduces the Chinook harvest in Alaska and off Canada’s west coast of Vancouver Island by 15% and 30%, respectively, compared to the 1999 agreement that it replaced. The agreement provides a degree of flexibility to allow management agencies to decide how best to distribute the harvest impacts across their various fisheries to reflect domestic fishery priorities, provided the overall reductions are achieved. For some Chinook stocks, the total reductions will have to be much greater than the general obligation, due to the need to provide extra protection for certain very depressed stocks. The general obligation will not apply to hatchery stocks or healthy natural stocks that are achieving escapement objectives and can support harvest. In addition to predetermined harvest schedules, the agreement contains provisions that specify conditions under which even greater harvest reductions will apply. These so-called “weak stock” provisions serve as a safety valve to afford additional protection to stocks that may fail to respond to the recovery programs.

http://www.nmfs.noaa.gov/ia/agreements/regional_agreements/pacific/psc.pdf

A point to be considered; if Alaska reduces troll impacts on Alaskan origin King salmon systems, impacts are also reduced on the aggregate abundance of King salmon that are present in Southeast Alaska in the spring and winter at the same time. The Alaska Treaty obligation is to manage the achieve the all-gear Chinook quota which represents, in 2017, a 49% decrease in the harvest of Aggregate Abundance Treaty Chinook compared to the historical harvest share of Alaska during the base period. 1979-1982. Alaska will still meet its Treaty obligation if the total harvest of treaty Chinook meets the requirement of a 49% reduction from the base period.

If, for example 40,000 total fish from spring and winter were transferred to the summer fishery, what impact would that have on the aggregate abundance of coastwise Chinook moving through Southeast Alaska? Alaska origin SEAK/TBR stocks may compose 12% of the total Troll Chinook harvest, as given in the example Commissioner Swanton August 18th justification for the closure of the second Chinook retention period in August. But the 2016 estimate of total mortality for coast wide Chinook is 1.693 M Chinook. If one could add in the terminal run and escapement estimates of Chinook that move through the southeast Alaska fishery over the course of year, it could easily top 750,000 to 1 million Chinook. The affect of moving the harvest of 40,000 fish from winter and spring into summer would appear to be well below the level in which management of any fishery in WA or CA would change due to the redistribution of impacts.



Submitted By
Dennis thacker
Submitted On
12/28/2017 12:15:45 PM
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Chairman

Alaska Board of Fish

Southeast and Yakutat Finfish

Jan. 15th, 2018

Ref. Proposal 159 Public Testimony

I oppose the banning of aircraft.

I have been involved in the herring/salmon fishery in SE since 1988. I have never seen a creek robbing such as this proposal indicates. My suspicion is that it is just the opposite. That planes help prevent creek robbing. A fisherman has no idea who flies by, whether they are even looking at what they are catching. In this day of social media, skippers who think a pilot flies over and radios his catch to other boats might want to check his crews Facebook page.

Airplanes have been part of the fishery since the early 30's. South East is so large and boats so spread out it would be much more difficult to manage the fishery without use of planes. Most processors use aircraft for placement of their fleets and tenders.

What this proposal boils down to is competition and money. Fishermen who don't use aircraft feel that the fishermen that do may have an advantage. Therefore the fishermen that don't use planes don't want to be forced into using one and having to pay. Their solution is to get a regulation that prevents anyone from using planes. Their mistake is just hiring a plane doesn't mean anything. They need a plane and a pilot that knows the area and can see the fish in the water. Otherwise they are just wasting their money. That is evident by the turnover in the pilots over the years and the complaints of pilots looking in nets, not finding fish on their own.

There are approx. 10 to 15 planes involved in the salmon fishery in SE. About half are employed by processors and half by individual fishermen. There are probably 5 or 6 more private planes on contract to dept. for surveys. Maybe another 400 or so private/air taxi planes that can be flying on any given day. Maybe difficult to tell who is doing what.

Thank you for your time,

Dennis Thacker



Submitted By
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Submitted On
11/27/2017 7:52:42 AM
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Board of Fish,

Sitka Alaska 2018

Comment on proposal 159, use of aircraft

Dear Board Members,

I am opposed to proposal 159. I have made my living flying for a group of commercial seiners in SE Alaska since 1992. I take offense of being accused of aiding the fishermen in taking fish illegally. I have never been involved in illegal fishing nor do I know any pilots who have. In my experience pilots help stop illegal activities. During daylight if a fisherman is inclined to bend the rules, they don't know when a plane flying over is enforcement, spotter, air taxi, private plane or other. Therefore I seldom observe illegal fishing.

There are additional benefits that the pilots perform, such as spreading the fleet out, providing update information to biologists and hatchery managers as to run strength and location. Pilots also provide fleet information to several of our main canneries, as well as crew and parts movement.

Since this proposal references robbing creeks as a justification, I believe that is already illegal, so it doesn't seem we can make it more illegal by adding a new rule.

The goal of the spotter is to find areas away from the main body of the fleet so their boats can fish with a minimum of congestion and wait times. Sometimes that is difficult because of limited area opening due to our poor returns of recent years. Most fishermen do not want to pay a pilot to get in a line-up.

Thank you

Dennis Thacker



Submitted By
Derek Thynes
Submitted On
12/28/2017 2:17:37 PM
Affiliation

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proposal 54 I oppose

drop in pot numbers will encourage more frequent pot hauling increasing excessive handling of crab

proposal 55 I support

this type of gear reduction has worked well in Bristol bay and SE herring gillnet

proposal 56 I oppose

reduction in commercial area is always bad economics in this case unneeded with Hollis bay being closed to commercial catch and no summer season in district 1 and 2. I used to crab in hollis bay before the closer and know it to be one of the most productive areas in district 2 catching at least 2000 crab a year out of Hollis bay i had about 1/4 of the gear in there.

proposal 235 I support

this method has been proven to work here and on the westcoast for decades

proposal 64 support

we are losing crab to old age in between fisheries might as well catch them

proposal 73 support

this would add value ,increase safety and minimize handling of nonlegal crab



Submitted By
Donald Klepser
Submitted On
12/15/2017 10:07:30 AM
Affiliation

PROPOSAL 146 5 AAC 33.364

i support this, this is one of the reasons that the seine fleet is under their allocation %.
and it disprortionally puts the gillnet fleet above its level

Submitted By
Donald klepser
Submitted On
12/15/2017 10:25:32 AM
Affiliation

PROPOSAL 153 5 AAC 33.360

Take no action. In reality during the pink management plan for district 1 seine, the gillnet fleet is tied to the seine fleet not the other way around as stated. If there is low abundance and management reduces the days seiners are allowed to fish there is a corresponding reduction in gillnet days. so once again its the gillnet fleet tied to the seine fleet. let fish and game manage the fishery for future returns. I dont see what this acomplishes that isn't already in effect now

Submitted By
Donald klepser
Submitted On
12/15/2017 10:40:41 AM
Affiliation

PROPOSAL 140 5 AAC 33.383

do not approve this. Anita bay is one of the best examples where a THA is operating as designed.

Both seine and gillnet gear groups catch the fish in common property fisheries on the way to the THA and both equally harvesting in the THA.

This continued allocation discrepancy wont be fixed by this. Pink prices are high, For profit private hatcheries fish are counted though neither gear pays into them yet the bulk is caught by gillnetters so there percentage is artificially inflated by this.

Submitted By
Donald klepser
Submitted On
12/15/2017 10:02:55 AM
Affiliation

PROPOSAL 145 5 AAC 33.372

i request that this proposal NOT be approved. There is no language in the proposal that once the seiners are in their range that this will return to the previous management plan.

When Nakat was a rotational fishery with the seiners it was of little benefit to the gillnet fleet. The harvest capabilities of the seine fleet can clean the bay out in 12 hours. This was experianced in the past. Allowing them three openings in july would essentially give them the whole harvest. SRAA doubled the production at Kendrick bay to allow them to have essentially all of the Nakat harvest with out sharing with the gillnet fleet.

The northern areas are now coming online with production geared towards the seine fleet. Why does it always have to be SRAA that takes the burden of meeting the out dated allocation tables.



Submitted By
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Submitted On
12/26/2017 2:40:08 PM
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Dear Board Members,

I would like to address my oposition to Proposal 159.

I have been involved in fish spotting and commercial fisheries support since 1985, and can honestly say I have not seen or heard of a situation were aircraft have been used to evade law enforcement to aid in illage harvest of salmon in Southeast Alaska. This proposal should not be considered without clear, reliable data that proves the statement, "Currently aircraft are being used to evade law enforcement and spot fish in closed areas.... The vessels then 'herd' the fish to open areas..." Until there is proof that this is occuring, this proposal should not be considered. I believe aircraft used to spot or support the commercial salmon havest during open fishing periods have helped to detour illegal operations. When airplanes are flying around, people think twice before breaking the law.

Many proposals in regards to fish spotting in Southeast Alaska have come before previouese boards and have failed.

Thanks for your time,

Doug Riemer , N815V, Nordic Air

(907)-518-0244



Submitted By
Ed Young
Submitted On
12/27/2017 10:29:31 AM
Affiliation

For the first time I can ever remember there was no herring in Sitka Channel in 2017. I used to get a herring jigger at Thompson harbor and fill it in less than an hour. This year there was none... I only caught one herring last year.

At the turnaround (Halibut Point Road and Katlian Street) there used to be lots of crab grass and the herring were so thick that you could walk on eggs the spawning was so heavy. Also in front of McDonalds.

Last year, out in Crow Pass, we set in the spawn area and went back the next day and it was gone... Kassiani was the same way. In the past if we set 3 or branches in a couple days we would have all the eggs we need.

My brother and I were playing in the spawn and heard something hissing and looked down at a tide pool and it was full of herring, so we ran home and got a bucket.

The herring used to be huge around here back in the 60's and 70's before they started killing them in earnest. When we were kids we'd go to the Tackle Shop and buy twine and hooks and snag herring. We'd drop them off to elders and go get some more. At ANB float. There was always herring all through the channel. They have been gone since the early 70's.

They've killed off Kashakes Seymore canal, Tenakee. Even with just the bait herring. We were out in Tenakee at night and all the boats turned on their lights and the herring came bubbling up and the whole inlet was full of herring.

Auke Bay, Hobart Bay all used to have big herring runs. But they're gone due to over fishing... somebody's got to realize they're killing it all... not just the herring but the king salmon.

I keep hearing there are freezers full of herring roe because the Japanese don't even want it any more.... basically, killing it for no reason.... just for the dollar.

They don't care about the people who live here... they've been trying to get rid of us forever.

I hope people keep it up. Speaking Out.

Anywhere along Halibut Point Road and Sam Sing Cove and Alutkena, Deep Inlet, Sandy Cove, across from Camp Coogan.

Pick ne outside Pirates Cove and get ne. (Eggs on hair kelp)



Submitted By
Edith Williams
Submitted On
12/14/2017 11:05:45 PM
Affiliation

I can't be there, but I know I would tell about growing up in Millerville and every spring before the airport was built, the herring would plug the beach on the other side of the lagoon on the causeway to Alice Island and Charcoal Island. This was before environmental impact statement was law, otherwise the airport would not be where it is today.



Submitted By
Elsa Sebastian
Submitted On
12/28/2017 10:00:33 PM
Affiliation

I write my comments to encourage the BOF to give thought to the future of young fishermen and future generations when they consider the proposals that call for the conservation of herring. I have fished in Southeast Alaska for my entire life, and for the past 5 years have captained a troller. I am in favor of proposals 98, 99, 105 and 106. I will be brief in my comments on this issue, but when BOF considers proposals related to herring, I'd hope that they'd consider the following realities and what they mean for the future of small boat commercial fishermen, especially young fishermen who are investing in an uncertain future.

- **Southeast Alaska waters are less productive today due to declines in herring populations.** Please reference Tom Thornton's Herring Synthesis for testimonies from regional subsistence and commercial fishermen who offer their observations of sharp decreases in herring abundance across Southeast Alaska. I recognize the names of many commercial fishermen who I know and respect, including neighbors from my home community of Point Baker on the north end of Prince of Wales. They, along with many others, share their historical observations of thick herring spawn in areas that are now depleted or devoid of herring spawn. As a young fisherman, the loss of productivity of SE AK waters is troubling. Herring are a forage fish foundational to the marine food web, and critically important commercial species, including king salmon, rely on their abundance.
- **Increased pressure on forage fish by rebounding marine mammal species.** I am a board member of Alaska Whale Foundation, a research organization that studies humpbacks in Southeast Alaska. Although AWF didn't study the issue, we heard reports from colleagues of unusually high winter (2016-2017) populations of humpbacks in Southeast. According to observations, these whales were visibly unhealthy, and it was speculated that they didn't have the fat reserves necessary to travel to Hawaii to breed. We also heard reports of a record number of humpbacks in Hawaii dying from starvation (Hawaii is the breeding ground for SE Alaska humpbacks). Whales rely on many of the same forage fish, herring included, as our important commercial fish. Starving whales are a symptom of an unhealthy ecosystem. We also need to be aware of the impact of recovered marine mammal populations on forage fish, and manage the harvest of herring to accommodate this pressure.
- **The continued pressure on North Pacific forage fish from hatchery salmon.** According to the North Pacific Anadromous Fish Commission, hatchery release of salmon from the U.S., Japan, Russia and Canada was over 5 billion fish. The expansion of hatchery salmon programs, also points to a need to accommodate for increasing pressure on forage fish.
- **We are living an era of climate change and ocean acidification.** Warmer and more acidic waters will affect marine ecosystems in ways that we cannot anticipate. We do not know which species will decline, and which will flourish, but one of the most obvious ways to try to bulwark the resilience of the system is to be highly precautionary in our management of forage fish stocks.

For the past 6-years I have invested time and money into my commercial fishing business. I am worried about the resiliency of the marine systems that I have built this business on, and I am not the only one. In conversations with other young fishermen, the changing climate, and pressure on forage fish comes up over and over. There's little we can do to address the threat of changing ocean conditions, but the BOF does have to opportunity to try to manage forage fish for the resiliency of all of the species reliant on them. It's up to the BOF to consider the value of herring not just in the nets of the sac-roe fishermen, but in the ecosystem as a whole.

Please support one of the strong proposals for the conservation of herring, either proposal 98 or 99 would be a step towards managing herring in proportion to their role in the marine food web. I think proposals 105 and 106 would also be a benefit to herring conservation, and would directly address the valid concerns of the Sitka Tribe of Alaska.

BOF should manage herring stocks for what they are, a critically important forage fish. Herring were once abundant across Southeast Alaska, but now their future is likely dependent on the management decisions that are made in Sitka Sound. Thank you for taking the time to consider this important issue.



Submitted By
Eric and Sarah Jordan
Submitted On
12/28/2017 6:22:36 PM
Affiliation
personal

ADF&G Boards Support,

P.O. Box 115526, Juneau, AK, 99811-5526 Dec. 28,2017

Chairman John Jensen,

Alaska Board of Fisheries

Dear Chairman Jensen and Board members,

My name is Eric Jordan. I am a lifetime resident of SE Alaska and have lived in Wrangell, Ketchikan, Petersburg, and Sitka (41 years). I have been fishing since my parents took me fishing when I was 5 months old.

I have been involved in fisheries politics since the early 70's, speaking to the BOF for the first time in about 1973. I have been a member of the Sitka Fish & Game Advisory Committee almost continually since 1976. Among numerous fisheries boards, task forces, and conservation boards and employment I have served 8 years on the AP to the NPFMC, 7 months on the BOF, and 3 years on the SE RAC to the Federal Subsistence Board. Presently I am on the Sitka Fish & Game Advisory Committee and represent trollers on the NSRAA Board.

I troll salmon for a living on my 37' troller the "I Gotta".

My comments on many of the proposals and plans you will be considering in Sitka are reflected in the Sitka AC positions so I will limit my comments here to a concise comment on a few issues.

A. Problems the BOF must resolve.

1. The management of SE troll king salmon season in 2017 by a US Canada treaty Commissioner to initiate a mark select fishery and to eliminate a scheduled August troll opening "Alaska Salmon Hatchery and Enhancement Regulations (Title 5 of the Alaska Administrative Code) Chapter 40. Private Nonprofit Salmon Hatcheries 5 AAC 40.005. General. ***The harvest of salmon inhabiting the water of the state, regardless of whether the salmon are naturally or artificially propagated, may be conducted only pursuant to regulations adopted by the Board of Fisheries***". You will hear a lot about these unpopular decisions which cost Alaska millions of dollars and the department a lot of well earned support from trollers to save, according to the best information available to the public (CW) a couple of hundred SE wild king salmon.
2. Management direction for the Dept. to conserve SE wild king salmon while minimizing impacts to the troll fishery markets, processors, hatchery fisheries, fishermen, and crews. Historic BOF decisions, often after long battles, to dedicate 45,000 kings to the winter fishery, manage the hatchery troll fisheries to optimize troll harvest, and manage the summer season to distribute kings between July and August must be considered and not arbitrarily overturned by a Deputy treaty Commissioner. The Dept (outside of that problem) is doing the right thing by offering conservative management plans on the Unuk and Chilkat. But, the BOF must also take into account socio-economic factors like, for example, weighing the cost of saving not more than 10 Chilkat Chinook by delaying the troll season a week or two in July.
3. Efforts to fund a multi-million dollar mass marking and initiate mark select fisheries for the troll fishery outside of the BOF process by the US Canada treaty Coalition must be confronted. You have resolutions and letters from NSRAA, the Sitka AC, and Alaska trollers opposing this fishery. But it is symptomatic of a bigger problem with US Canada treaty operatives intruding into BOF and regional fishery manager realms with disastrous results both in terms of management and ruination of public processes.
4. Trollers remain well below their allocated share of SE Alaska enhanced salmon.



B. Recommendations for actions to resolve identified problems.

1. Direct the Dept. to bury the mark select king salmon fisheries for the troll fisheries. Confront intrusions by the treaty coalition and operatives into the BOF areas of jurisdiction.
2. Direct the Dept. to manage the troll fishery with surgical precision to conserve SE wild king salmon while maintaining as much as possible existing seasons, and internal and external allocations. Direct the Dept. to use a scalpel rather than a machete to craft opportunity while assuring wild king salmon escapements and rebuilding. Do work with the troll fleet, AC's, and communities instead of management by edict with minimal notice.
3. I, and a lot of other conservation minded trollers, believe, based on the best information available to us, that the action plans for the Unuk and Chilkat we have seen, and forthcoming plans for other SE wild king salmon management, can be improved by careful examination of the data and surgical timed area openings and closures. That plans to close the winter fishery throughout the region a month and a half early, and delay the summer salmon troll season a week or two is not warranted by data available to the public.
4. Opening the summer troll season on the long time traditional date of July 1 is important for a lot of reasons. Opening then to harvest other salmon when king salmon have not seen a lure for months is not something conservation minded trollers want. I recommend open July 1 for as short as two days to start the season and then go to non-retention until August when SE spawners are past the troll fishery, the remaining king salmon are usually larger and worth more.
5. You have several proposals to improve troll opportunity on hatchery produced chum salmon. 150,173,174, and 175 address that fishery. The data shows the chum troll fishery is highly effective at targeting hatchery chum with practically no by-catch. These enhanced chum salmon troll fisheries have become particularly important to trollers as king salmon retention areas and times are reduced. Please adopt these proposals.



Submitted By
Franklin James, Srl
Submitted On
12/21/2017 1:19:28 PM
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Herring fishers in Sitka:

Comments on how the sac roe fishery in Sitka, and how it has been handled, first I will comment on other areas first.

Chatthem Straits: There use to be so much herring in that area, the fish & game let all these sardine seiners wept and destroy that area, and that includes Warren Island and inside and out side of Pedro.

Ketchikin, Kah-Shakes area: again mismanagements by the fish & game, use to be big spawns in West Behm, Gravina, all the way to Naha, Mary Island, Kah-Shakes area, all are gone, can not even get anything thick enough to eat.

Craig, Klawock and McFarland Islands area: Spawns in these areas were do big, it made the Sitka area look like a small spawning area; winter bait fishery and pond fisheries are fast depleting those areas.

Seymour Cannal: that area will never recover.

Sitka: was also a big spawning area, now you will see lots of milk in the water; as we all know, the female come in first and then the male herring, they kill off all the female, and the male let there milk go, and there are no female herring to lay there eggs, the fish & game will kill that off next, like the rest of S.E. Alaska, for the almighty dollar.

Franklin H. James, Sr.

Love my herring eggs,

It is getting harder and harder to get.



Submitted By
Fred Fayette
Submitted On
12/28/2017 8:31:57 PM
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Board of Fish

I have been trolling in SE since 1972 and have seen many changes to the fishery. I have always been supportive of actions to protect our king salmon stocks. This past spring and summer there were three actions that seemed counter to protection.

1. Our spring hatchery fishery was severely curtailed. We fish inside waters near Sitka, where the stocks of concern are not a problem. Yet the charter fleet fishes ,every day, in areas that the stocks of concern pass through. It doesn't seem as though ADF&G cares enough to shut down everyone. Are they really worried about the fish ?

2. The Mark Select Fishery was imposed on the fleet without much thought about how it works in reality. There are not many fin clipped kings. They are worth a lot of money. Fishermen will bring a fish aboard to see if it's missing that adipose fin. The mortality rate will increase. This MSF was introduced against the wishes of the Alaska Trollers Assn and many, many fishermen. Why would we give up a chance to catch more kings ? Because we care about the long term effects of shaking so many non fin clipped fish.

3. It now appears that ADF&G knew that the stocks of concern had already passed the outside waters when they decided to not reopen our fishery in August. That decision cost our already depleted fleet more than \$3,000,000. There was no biological reason to implement this closure. That was a massive blow to the fleet.

Thanks for your consideration

Fred Fayette



Submitted By
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Submitted On
12/20/2017 2:45:24 PM
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TO: Board of fisheries concerning proposal 56 SE shellfish .

From: Gary Adkison

I AM OPPOSED TO PROPOSAL 56 .

I am a full time resident of hollis the community that this proposal is supposed to help. First of all there is still more than enough shrimp and crab to support a subsistence "lifestyle". Just last week I pulled 2 Dungeness pots that had 20 nice hard crab way more than one family could possibly eat in a night . however no one in this community depends on it to "survive" it is a "LIFESTYLE" . There is already an area right near the community that is closed to commercial harvest . This area has a very good crab population. In my 28 yr here I have never seen a time you could not paddle out in a skiff with two pots and get enough crab for a family to eat there fill.

I have lived here since 1989 and grew up fishing these waters with my father. I started commercial Dungeness fishing here in 1998 In that time I have seen the crab catch fluctuate as you can plainly see by looking at historical catch records there is roughly a 10 and a 20 yr spike followed by a notably low catch rate. There are also fluctuations in market price and with these fluctuations comes an increase and decrease in effort. In 1998-2000 there was more boats fishing this area than there has been the last few years the only difference is that the people that wrote this proposal were not here to see it.

I do Understand That most of the people now living in this community have not been here long enough to see the ups and downs of these fisheries. And it could look as though over fishing was the culprit, having only 5-10 yrs to observe. But I truly believe that it is just a natural cycle. The only real threat to the Dungeness fishery is sea otter !!!!!!!

Thank You For taking the time to consider my thoughts on this Subject.

Gary Adkison



Submitted By
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12/20/2017 2:49:13 PM
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TO: Board of fisheries concerning proposal 84 SE shellfish .

From: Gary Adkison

I AM OPPOSED TO PROPOSAL 84.

I am a full time resident of hollis the community that this proposal is supposed to help. First of all there is still more than enough shrimp and crab to support a subsistence "lifestyle". Just last week I pulled one single shrimp pot and got enough shrimp for a family dinner. I pulled 2 Dungeness pots that had 20 nice hard crab way more than one family could possibly eat in a night . however no one in this community depends on it to "survive" it is a "LIFESTYLE" .

I have lived here since 1989 and grew up fishing these waters with my father. In that time I have seen the shrimp population come and go. In the 90's there were times we could not catch a 5 gallon bucket of shrimp out of 100 pots and the cod fish were thick. Then for some reason we quit catching cod and starting in 2000 the shrimp fishery here exploded for the next 10 yrs. then we started to see an abundance of cod once again (large eye pollock and pacific cod) and we noticed large areas almost void of shrimp from one yr to the next. Not from over fishing because they were excellent grounds when the season closed and a significantly decreased biomass when the season reopened a yr later. I was concerned myself and cooperated fully with ADFG when they started doing their surveys and sampling I provided them with charts of all the known shrimp grounds . I do not disagree with adfg's decision to close the commercial harvest of shrimp temporarily in this area until it can rebound . I feel that the adfg biologists have the situation under control and when the biomass does rebound there is no reason there shouldn't be a commercial fishery once again .

I do Understand That most of the people now living in this community have not been here long enough to see the ups and downs of these fisheries. And it could look as though over fishing was the culprit, having only 5-10 yrs to observe. But I truly believe that it is just a natural cycle and an increase in cod predation.

Thank You For taking the time to consider my thoughts on this Subject.

Gary Adkison



Submitted By

Gerald Hope

Submitted On

12/18/2017 10:58:04 AM

Affiliation

This comment addresses the upcoming, 2018, Herring Fishery in and around the Sitka Sound Area. I am approaching my 64th birthday, was born and raised in Sitka, Alaska. I have, in my lifetime, witnessed a dramatic decline in the amount of herring in the Sitka Sound Area. In my childhood years, living in the Sitka Village on Katlian Street, it was common to see vast amounts of herring swim through the Sitka Channel, often being chased by sealion. The amount of herring in those days that I recall then, early 1960's, it was such an impressive sight that many in our Native community looked forward to. It was because we knew we could count on one of our traditional Native foods to be here, to access, to eat. Now, in these recent years it has become scary to see such a decline in both the amount of herring and the herring spawn. And, it has been a number of years now since being able to see herring even swim through the Sitka Channel, certainly not in anything close to resembling the mass that swam through in my childhood days. I strongly support the propositions submitted by the Sitka Tribe of Alaska.



Submitted By
Greg Albrecht
Submitted On
12/15/2017 10:18:27 AM
Affiliation
none

Proposal 63: SEAK Red King Crab

I oppose this proposal, specifically because it allows harvest when king crab biomass does not meet the current minimum biomass threshold. Though I recognize the harvest would be minimal, populations in unsurveyed areas can be genetically connected to the broader population. Perhaps the test fishery could be executed in years of abundance.

Proposal 64: SEAK Red King Crab

I oppose this proposal for the following reasons: The 200,000 lb minimum threshold (formerly 300,000 lb) has resulted in a cycle of harvest followed by fishery closure and subsequently, does not meet the requirement of Article 8, section 4 of the Alaska Constitution, maximum sustainable yield. Fishing should only be considered when harvestable crab biomass in a given area is above a threshold established by biological data, not economics.

Proposals 132, 133, 134: Spring salmon troll fishery management

I support these proposals which use a combination of existing data and closures to more precisely manage these fisheries for sustainability and use by all groups.

Proposals 137, 185, 188, 190, 191, 192, 194: Personal use

I support these proposals which are steps towards restoring southeast residents a "fair and reasonable" opportunity to fulfill their personal use needs as required by AS 05.16.251(d). The board has enacted a regulation (5AAC 77.682(c)) that diminished this right afforded in statute. ADF&G provides very few opportunities for Juneau residents to efficiently gather salmon for a sustainable and healthy food source that is at the core of what it means to many to be Alaskan. Meanwhile, non-residents may take fish caught with efficient gear types for their home-pack (5AAC 39.010(a)), much of which goes unreported.

Though current regulation (5AAC 77.682 (n)) allows for 150 pink and 50 chum salmon to be harvested from waters open to personal use fishing, only fresh waters are opened where fish quality for these species is low. Allowing the use of efficient gear types for personal use in salt water, in this case, could provide high quality fish for a person looking to can, smoke, or freeze a large number of pink or chum salmon for their family that would be "reasonable" and most likely, have little effect on the actual number of fish harvested. The benefit being the reduced expenditure of time and money by the fisher.

Allowing similar means for the taking of coho and king salmon in saltwater could arguably result in more harvest by non-commercial fishermen; however, this is their right. Since restoring the ability of Southeast residents to efficiently gather salmon is "in the broad public interest", which can take priority over "an existing resource use" as stated in 5AAC 77.001, reallocation of the resource among user groups must be undertaken. It is the law.

Thank you for your time, consideration, and service to the Board.



Submitted By
greg dierick
Submitted On
12/27/2017 2:47:34 PM
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This is in opposition to proposal 165 on markers being moved on the Tsiu river, being a commercial fisherman and lodge owner on this river for over 40 years, i feel the commercial regulatory markers should be kept as is (1/2 mile from any part of the the lake the water flows out) as there is already a huge conflict between commercial and sport fishermen, i have other ideas to deal with this problem such as giving commercial fisherman more fishing time on the river or moving the markers up from the half mile to a 1/4 mile from 10pm to 4am on commercial fishing days, this gives the commercial fisherman plenty of time to clean out the few holes of fish in this area without conflict to the sportfishery,(since the sportfishermen usually show up around 5 am and leave the river at night around 9pm) trying to get everyone on the the river to get along has been a challenge on this river , i hope you give some of my recommendations some consideration as both groups want to work together but the river is so short now and just moving the markers up will do nothing but create more conflict. thank you



Submitted By
Heather Sanborne
Submitted On
12/28/2017 2:48:34 PM
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fishing charter company owner

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To whom it may concern,

December 28, 2017

Re: Regulations Pertaining to King Salmon in District 15

My husband and I own Mozeon Alaska Charters and have been running scenic fishing charters in Skagway (Skagway Salmon Fishing) and Haines (Haines Family Fishing Charters) since 2014. The purpose of the following letter is to briefly describe the current charter operations in Upper Lynn Canal and explain the minimal impact these operations have on the King Salmon fishery.

It is understood that Fish and Game is concerned with King salmon numbers and is investigating various strategies to help future populations. We want to stress the VERY minimal impact that the operators in Upper Lynn have on King Salmon.

- There are only 4 operators in Skagway, 3 in Haines: Of these 7 boats only 5 fish primarily for salmon. Contrast this to dozens and dozens of operators in Juneau, Ketchikan and Sitka. Minimal operators means less pole hours and less stress on the fish
- We have all adopted safe fish handling practices including barbless hooks, releasing in the water and use of rubber nets for any fish brought on board etc. This all increased our rate of successful release without harm to the fish.
- We see less fish between all 7 companies over the course of the entire season in District 15 than a commercial gillnetter sees in a typical 2 day opener.
- We have shifted the focus of the trips from catching fish to wildlife and scenery. We market to families and small private groups who want an overall incredible experience rather than meatheads that want to fill their freezers at home with fish. The more avid fisherman is attracted to the bigger fishing ports of Juneau and Ketchikan.
- After the change in regulations in 2017 to no king salmon retention we started rigging for pink salmon and other species on our trips instead of kings. It was a great success. The guests we have on board are happy with action on the line whether it's a king a pink or a dolly. This decreased the pressure on the king salmon and greatly reduced the amount of juvenile kings on the line while taking advantage of the seemingly endless supply of pink salmon.
- The no retention regulations in 2017 caused a huge decrease in the number of locals and Canadians trolling for salmon in Upper Lynn Canal which relieved most of the normal pressure on the kings in our area.

Closing charter fishing down in district 15 would be completely detrimental to the livelihood of the operators there. Please consider keeping the regulations in 2018 the same as 2017 and looking at the other options to increase king salmon numbers. Again, closing fishing down completely in District 15 would have minimal (if any) positive impact on king salmon numbers.

Thank you very much for your time and attention to this very important matter.

All the best,

Heather Sanborne

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Submitted By
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12/17/2017 10:22:51 PM
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To whom it may concern,

I am writing to those that will be making decisions on the Sitka Sac Roe Herring fishery. I am very concerned about the health of the herring in Sitka Sound. I have been harvesting subsistence roe on kelp and branches for over 12 years now and every year I go out there are less and less fish and less and less eggs or deposition. This year when we went out to set branches we set in a good spot with lots of milt in the water. The branches were barely covered in eggs when we pulled them. When we check where ADF&G reports spawn, sure there is milt there, looks good from the air maybe but when you look at the shore there are only a sprinkling of eggs and no birds. In the past you would see thick spawn maybe an inch or more of eggs stuck to the rocks and birds everywhere feasting. I have skiffed all around Sitka sound looking for good kelp with spawn. I have not been able to harvest roe on kelp with any more than a sprinkle of eggs as well, it's not worth it. I want you to know because you may not be here in Sitka to see what is happening. The herring just are not here like they used to be. Even if you believe the sac roe fishery has nothing to do with the numbers declining, wouldn't it be prudent to start being very conservative when it comes to fishing them? As a harvester I even question the morality of harvesting subsistence eggs at this point, that's how bad it is. It's hard to live here and not notice the decrease in wild life coming to our shores every spring. If ADF&G believes the Sitka Sound Herring stocks are doing just fine then perhaps they are paying too much attention to flawed science and not to nature's obvious clues. Please show respect to future generations of humans and herring when you make decisions on herring in 2018.



Submitted By
Jackie Timothy
Submitted On
12/18/2017 8:48:00 PM
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Personal use and sport fisher

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Proposal 54. **Support.** Less pots, less ghost pot fishing potential.

Proposal 55. **Oppose.** Commercial fisher pressure, sea otter predation, and area closures stress Dungeness crab populations. More pots, more ghost pot fishing potential, and more unnecessary stress on the population.

Proposal 63. **Oppose.** In accordance with the precautionary principle, assume when king crab biomass in areas considered for commercial harvest does not meet the minimum threshold, king crab from unexplored areas contribute to population recovery. Require commercial fishers interested in exploring new areas to fully fund the research necessary to determine the contributions of unexplored populations to populations in threshold determination areas and also fully fund the surveys and analysis necessary to determine harvestable biomass above that level in unexplored areas.

Proposal 64. **Oppose.** Commercial fishers pressure fishery managers into opening the red king crab fishery in 11A when abundance is low resulting in a cycle of harvest followed by multiyear closures. 11A provides an extraordinary and unusual Alaskan opportunity for urban red king crab personal use fishers that should no longer be decimated by greed influenced mismanagement.

Proposal 75. **Support.** Limit number of pots and pounds by permit.

Proposals 82 and 83. **Support.** Unique urban shellfish fisheries opportunities must not continue to be diminished unsustainably by commercial users able to access areas not accessible by smaller vessels.

Proposals 132, 133, 134. **Support.** Manage fisheries on data and closures for sustainability and equity among user groups.

Proposals 137, 185, 190, 191, 192, 194. **Support.** Restore a "fair and reasonable" opportunity to southeast personal use fishers as required in AS 16.05.251(d).



Submitted By
James Carter Hughes
Submitted On
12/20/2017 3:56:36 PM
Affiliation
self

Dec 20, 2017

Chairman Jensen and members of the Alaska State Board of Fisheries (BOF):

My name is Carter Hughes and I am a Sitka based troller. I also participate in the halibut and sablefish longline fisheries. I have worked in the Alaska commercial fisheries since 1984 and have owned my own fishing vessel since 1993. This is the first of two written comment (WC) letters I am sending the BOF. This WC focuses on the proposals that are in the book that was released earlier this year. The next WC will focus on the Alaska Department of Fish and Game's (ADFG) soon to be released plans for rebuilding chinook stocks in the Southeast Alaska (SE AK) region. In order to keep this WC document as short as possible I will minimize my comments if I think the Proposal author(s) has explained their case sufficiently.

Groundfish Proposals:
Prop 113 Support

Prop 115 I support the concept of this fishery but I think it needs to be initiated as a test fishery first. Perhaps the authors or others interested in participating in a dogfish pot fishery could work to establish a test fishery utilizing a Commissioner's special permit.

Prop 116 Support

Prop 121 Oppose I don't fish sablefish in inside waters but the precedent the proposal sets a bad. It looks like a reallocation request dressed up in conservation rhetoric that favors larger vessels. The conservation claims are not substantiated with evidence (the numbers are inflated) and conflict with my personal experience. I do support the idea of free choice between pots and longline gear but the two types of gear can conflict and only larger vessels can operate pot gear efficiently. Pot gear can get lost and cause problems just as easily as longline gear. Pots tend to catch smaller fish which means more fish die to make the same poundage. Pots do tend to have lower bycatch and probably eliminate marine mammal depredation. However, there are ways to reduce marine mammal depredation with longline gear that the proposal author ignores. There are also ways to reduce excessive bycatch with longline gear. Alaska Longline Fishermen's Association (ALFA) has networks and data collecting programs that provide information to fishermen on hotspots for rockfish bycatch and marine mammal depredation to help fishermen avoid the situations the author of this proposal mentions.

Prop 124 Support

Prop 127 Support

Prop 133 and Prop 134 Oppose ADFG is currently developing a plan to address the low chinook returns in the SE AK systems. This will likely include closures the last 6 weeks of the winter troll fishery and closures to many spring troll (hatchery access) options for the troll fleet. Proposals 133 and 134 will close troll opportunity on non Chinook salmon fisheries. None of the other fisheries, sport or gillnet, is being restricted for non Chinook harvest and there should be no non Chinook restriction on the troll fleet either. Some of the district areas that are discussed in these proposals include troll chum fisheries, which do not target king salmon. If the authors of these proposals want to be consistent with their alleged conservation concerns then they would shut down all fishing activity, sport and gillnet non chinook fishing as well. I would not support that concept either as I see no reason to close non chinook fisheries of any type in this situation. Again, ADFG has a yet to release its plan to address these issues. The BOF will be in possession of the ADFG plan by the time of the January meeting.

Prop 139 Oppose As I understand the current rotation scenario, it allows for troll and seine rotations in the Southeast Cove Terminal Harvest Area (THA) to target chum salmon. The troll fishery has been chronically under its enhanced fish allocation for years. The seine fleet is at or just under their allocation as well. This proposal would potentially allow for a gillnet rotation in SE Cove. The gillnet fleet has been ahead on their enhanced salmon allocation for years. NSRAA has historically demonstrated an indifference to the troll enhanced salmon allocation underage. Just one year ago, NSRAA cut production of Hidden Falls king salmon and Mist Cove coho to fund chum production. Both the cuts effected troll focused programs to increase funding for and production of chum salmon, which some claim is a net fish salmon species. There has been some progress made recently at NSRAA in allowing trollers access to new and future chum salmon production and the troll rotation in SE Cove is an example. If this proposal passes then all it would take is a vote of the NSRAA board (trollers are outnumbered on the NSRAA board) to allow for a gillnet rotation, which would require that trollers have less time in the SE Cove THA. It will be important for the troll fleet to expand opportunities to harvest non chinook salmon species in the future as the opportunities to harvest chinook is likely to be limited for the next few years.

Prop 144 Support This proposal has been modified to allow for troll access to the Deep Inlet THA during cost recovery and not during net rotations. Thus it in no way displaces seiners or gillnetters from their current access. As mentioned before the troll fleet is running very far behind in their allocation to enhanced salmon. The revised version of this proposal, that does not allow for troll access during net rotations is a fair way to provide some miniscule increment of increase to enhanced salmon production for the troll fleet.



Prop 146 Oppose The Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (SAESAMP) was implemented in January 1994 by the BOF after the Southeast Alaska Allocation Task Force (SATF), formed by the BOF in 1991, submitted a consensus paper describing the current sharing arrangement. All three gear groups had 2 voting members and the private non profit (PNP) hatcheries were represented by a non voting seat that was held by Douglas Island Pink and Chum (DIPAC). Proposal 146 is designed to solve the current enhanced salmon allocation inequity issues by removing a key component (the PNP) from the equation. The SEASAMP agreement included the PNP and was a consensus, ie all voting members of the SATF came to a common point of view, when it was worked out in the early 1990s.

There is another way to solve the problem using the existing management plan, and that is stated in Guiding Principal 13 (GP 13) of document 94-148-FB, Findings of the Board of Fish, The Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364). GP 13 offers 3 options for the regional hatcheries to address enduring allocation issues with respect to enhanced salmon.

1. Special Harvest Area (SHA) management adjustments (example: rotation modifications in a THA or SHA.) This is a short term option that is intended to help achieve the allocation goals until the long term adjustments of 2 and 3 can take effect.
2. New enhanced salmon production.
3. Modification of enhancement projects production, including remote releases.

The three options listed above have not been exhausted. Option 1 has been ignored except with Neets Bay, a SSRAA facility. Options 2 and 3 are being implemented by both NSRAA and SSRAA. The NSRAA projects at SE Cove and Crawfish Inlet are examples of longterm attempts to increase troll access to enhanced salmon. Time will tell how effective these projects are. That said it is not appropriate to change the current formula of allocating enhanced salmon among the SE AK commercial salmon fleets by removing the PNP from the count.

Prop 148 Oppose This proposal must have been written before the current crisis with the SE AK king salmon stocks was well known to many folks. As I have said, ADFG will be releasing a management plan for all harvesters of SE AK river chinook . There are definitely Unuk river intercept issues in the area that this proposal addresses. Most of the spring troll areas in the southern districts are likely to be closed or extremely limited. I can't see expanding bag limits for the sport and charter fleets in this area as prudent at this time and I doubt ADFG will either.

Prop 149 Support

Prop 150 Support

Prop 151 Support

Prop 172 Support I strongly support the concept of this proposal. However, this area may be under serious restrictions by ADFG until the Unuk River stocks are rebuilt. It may be that this proposal should be passed under the caveat that it not be implemented until ADFG feels its safe to fish in that area during the time discussed in the proposal.

Prop 173 Support

Prop 174 Support

Prop 175 Support

Prop 176 Support

Prop 177 Support

Props 178, 179 Oppose I am sympathetic to the concerns of the authors of these proposals when it comes to the economic impact on non Sitka communities when pre April closures of the winter king salmon fishery occur. The quality of product and market glut issues is weak however. The primary problem with these proposals is that the concern of pre April closurei caused by high harvest rates is an anomaly. The only 2 years where pre April closures, due to high harvest rates in the Sitka area, occurred were 2015 and 2016. This never occurred at any other time in the history of the winter fishery since the 45,000 king cap was implemented in 1994. 2015 and 2016 were anomalies. I started winter king trolling in 1994 and never saw any years like 2015 and 2016. Further, ADFG is likely to be closing the winter troll king fishery in mid March this year to protect SE AK king stocks of concern. If this proposal were to become regulation, it would most likely occupy space in the regulations and never be utilized.

Prop 180 Support

Prop 181 Support I strongly support the concept of this proposal and the author's reasoning is quite sound. I would be happy to support a scenario with two openers that is split 50% / 50% . It would add value to the troll fishery. It would reduce adding to market gluts in early July, the most glutted time of the year for salmon markets. That said, until ADFG releases their management plan for the SE AK king stocks of concern, this proposal will most likely not be able to be implemented. When management of the troll fishery returns to normal, I would very much like to see the king salmon openers in the summer season managed under this scenario.



Prop 182 I support the planning and scheduling intent that the author mentions. This is especially true for the processing sector. I would have to know what ADFG thought of this before supporting it.

Prop 183 Support

Prop 184 Support

Prop 185 Oppose This looks like an enforcement nightmare. If this is implemented than it needs a rigorous accounting system, complete with fish tickets and inspected landing requirements so that the very large increase in harvest is understood immediately. As far as chinook is concerned, the proposal would create more accounting and management problems for ADFG in rebuilding the SE AK chinook stocks of concern.

Prop 186 Support

This concludes my recommendations on proposals in the 2017/2018 Alaska Board of Fisheries Proposal Book. I am not sure if ADFG will have their 2018 chinook management plans released in time to submit written comments. I will comment on that, if possible, after it is released.

I have a couple of comments I am going to add to this testimony in regards to rebuilding plans for chinook in SE AK. Last year, only the trollers had a cut in harvest. The sport sector had some serious restrictions, but they still harvested beyond their section of the quota by 40%. If the stocks of concern are to be rebuilt, then there needs to be better accounting in the sport sector. It has to be more than voluntary. Remote lodges need to be treated similar to processors. They need to accurately report their catch weekly. Lodges need to provide for inspection at their docks and processing facilities by ADFG data collectors and enforcement. This can't be voluntary. This is a black hole of information that is needed by ADFG to rebuild stocks.

The longer that the rebuilding process takes, the more likely the hatcheries will be to scale back and eliminate hatchery king programs. These are primarily funded by the commercial fishing sector. It will be hard to argue for continued production of king salmon at hatchery facilities if those paying for them can't harvest them. I hope that the hatchery king programs can be maintained during the rebuilding process. This can only be done if opportunity to harvest AK hatchery kings that is low impact on the stocks of concern can be allowed. This is particularly true for trollers. The sport interests that want to maintain access to hatchery produced kings will have to understand that the hatchery king programs are not likely to be maintained for them alone. Sport accounting has to be improved so that cuts to the troll king fishery are not just reallocations to the sport sector. If sloppy sport accounting continues the likelihood of eliminating the hatchery king programs will increase.

I have another note on the hatchery production of salmon. Trollers are going to need increased access to non chinook enhanced salmon. This means more meaningful access to THAs (not 1 day a week like Deep Inlet). It also means maintaining coho programs and not cutting them to reallocate the funds to something else. My last statement is providing background information. I realize the BOF does not decide what salmon programs a hatchery funds.

Finally, restricting trolling opportunities to harvest non chinook salmon, such as chum and coho, should be avoided. The summer troll season should open for cohos on or before July 1. Troll chum and pink salmon fisheries should be left intact. If non chinook troll fisheries are restricted for the purpose of rebuilding the SE AK stocks of concern, than so should the same non chinook opportunities for all other salmon fisheries in the same area. If that is not done, then the conservation issue is not addressed; there is merely a reallocation of resource and area.

This concludes my comments. Thank you all for your commitment to Alaska's fisheries and all the folks that depend on them.

James Carter Hughes
FV Astrolabe
Sitka, AK



Submitted By
James Carter Hughes
Submitted On
12/27/2017 1:32:10 PM
Affiliation

Dec 27, 2017

Chairman Jensen and members of the Alaska State Board of Fisheries (BOF):

My name is Carter Hughes and I am a Sitka based troller. I also participate in the halibut and sablefish longline fisheries. I have worked in the Alaska commercial fisheries since 1984 and have owned my own fishing vessel since 1993. This is the second of two written comment (WC) letters I am sending the BOF. This WC focuses on the two draft papers released by the Alaska Department of Fish and Game (ADFG) that discuss the management options for the Chilkat and King Salmon Rivers and the Unuk River: **Draft: Chilkat River and King Salmon River King Salmon Stock Status and Action Plan, 2018. (CKS AP) DRAFT: Unuk River King Salmon Stock Status and Action Plan, 2018. (U AP)**. My comments will be fairly general as I think the specific actions required will be determined by the response and recovery of the stocks after initial actions are implemented.

First of all, it is apparent that there are real conservation concerns with these three river systems and I understand and support the fact that restrictions on fishing activity will be required to rebuild these stocks. I am a troller and the troll fleet has born the brunt of the restrictions.

The troll sector is the only group that did not get to harvest its section of the SE AK king salmon harvest last year. The sport sector was very tightly restricted in some areas, especially around Juneau. However, the sport fishery was never entirely closed to chinook retention until mid August when the troll fishery was denied its second opener on short notice. Further the sport fishery was allowed to exceed their section of the SE AK quota by approximately 40%. The economic impact on the troll fleet last year was severe and greater than the other groups. Trollers harvest the largest amount of the king salmon caught in SE AK, thus I can understand that trollers shoulder the largest component of the conservation burden. The two papers both dismissed or downplayed the economic impacts on the troll fleet. This bias is clearly present in the Benefit and Detriment statements that follow the management options. For all the Detriment statements that pertain to the sport group, mention of adverse economic impact to the charter fleet is explicitly mentioned. In the case of the troll and net fish groups, all that is occasionally mentioned is the potential lack of opportunity to harvest non chinook species of salmon. In some cases the economic impact is outright dismissed. On page 14 of the U AP, the Benefit statement for the troll Option 1 states: "**Benefits:** These management actions can be accomplished through EO authority and the user groups are accustomed to the actions. The restrictions are directly related to historical coded-wire tag data. The fisheries impacted by these restrictions experience minimal disruption." This statement is false. One year of implementation does not make the fleet accustomed to the action. Further, the disruption is severe, not minimal. I am rather surprised to see this statement in the document and it reflects a lack of understanding at ADFG of the troll fleet and how it is impacted by last minute notifications and massive area closures. The closure in May and June last year was region wide. It is quite possible that extremely disruptive actions were required and will be required to rebuild these stocks. I am not arguing that point. However, dismissing the impact as "minimal" is grossly negligent in describing the situation. If the charter fisheries warrant noting an adverse economic impact, so does the commercial sector, especially the troll fleet, which will be taking the biggest economic hit of all the various user groups.

One of the sources of bias is in the less stringent data collection methods that is applied to the sport sector verses the commercial sector. It leads me to believe that there is great uncertainty in the impact of the sport, especially charter sector. I mentioned in my previous WC document, that I submitted a week ago on the Proposals, that lodges need to be monitored more closely and their should be mandatory weekly catch reporting. Data collectors need to be able to sample fish for tag and genetic information. This data collection should be mandatory, not voluntary. There is nothing in the documents to address this. In Table 1, page 19 of the U AP, the data indicates a very low sport impact on Unuk chinook in the early section of part of the season, while displaying a much larger impact by the troll fleet. The sampling of the troll fleet is much more rigorous. I'm sure some uncertainty was used in accounting for the different sampling methods, but I still think the comparison is weak. The obvious lack of bias awareness is the worst thing about these papers. The actual suggestions for management actions are well developed and I am fully behind ADFGs work to rebuild these chinook stocks.

As I read the two papers, the options provided are to repeat last year or two more levels of increasing restrictions for all fisheries that harvest king salmon. At this point I am unable to select options for any user because I do not know what will happen next year. There are three key concepts that I would like to see applied to all fisheries that are discussed in these 2 papers.

1. ADFG should be able to continue to manage all the affected fisheries by Emergency Order (EO). This allows for flexibility and quick response either way, up or down. I do trust the local region managers, especially in my own fishery (trolling).

2. I do not want to see non directed chinook fisheries unnecessarily curtailed for any user group. In particular, for trolling, I want to see the coho season open on July 1. I want to see the Icy Straits – North Chatham chum fisheries open on or before June 15.

3. Where possible, I would like to see chinook opportunities that have minimal impact on the stocks of concern made

available. These opportunities would occur in places of historical very low encounter rates with stocks of concern.



ADFG does address all three of these concepts in the two draft papers.

This concludes my comments on the two draft action plans. Thank you all for reading my comments and thanks to ADFG for publishing the draft papers in time for me to submit written comments.

James Carter Hughes

FV Astrolabe

Sitka Alaska



Submitted By
James Fischer
Submitted On
12/28/2017 3:47:34 PM
Affiliation

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2018 Management Plan Comments from a New Fisherman:

Dear Board of Fisheries,

In January of 2017, after a lot of preparation, research, and thought, I decided to invest in a power troll boat and permit. This past April, I got to spend two amazing months fishing with my boat's former (now retired) owner, an excellent fisherman. The spring troll fishery was an ideal time for this. Though we were subject to some unexpected limitations this year, I was grateful to be on the water learning from a great man. For newer fishermen and deckhands, especially those of us who live in Alaska, the spring troll fishery doesn't just extend our income earning potential into a safer, less competitive environment, its slower days and lower numbers allow time for instruction and practice. New fishermen like me simply don't catch fish as efficiently as our seasoned colleagues. We depend on bigger windows of time where effort can compensate at least a little for our inherent inefficiencies. If there is to be a future for fishing, there has to be an entry point for new fishermen. The traditional spring fishery, especially in light of short summer openings, is an important time for us.

I understand that at-risk stocks are passing through our waters in the spring, and I fully support conservative measures to protect these stocks. But I also know that there are many areas where few to no fish from at-risk stocks are caught. This is why ADFG allows Sitka's large charter fleet to fish throughout the spring, and why Sitka's salmon derby continues to be held. Like commercial fishing, these things are important parts of our community and I'm glad that they can continue. If it's ok for some user groups to fish for Sitka king salmon in the spring, though, I would think the same could be said for the troll fleet, or vice versa. As I studied the 2018 action plan, I noticed that the troll fleet is set to be subject to much broader restrictions (time and area) than other user groups, some of whom target the same fish in the same areas. I would ask that data be applied consistently to conservation measures across user groups for the benefit of the fish and the livelihoods of the people who depend on them.

The treatment of the troll fleet in 2017 was something that I, like many others, wasn't ready for. This was accentuated by the recent investment I'd just made. But I was encouraged by the grace and patience I saw in our fishing community despite what was for many of us a very difficult time. I've been very impressed by the level and tone of discourse at the Advisory Committee level in our community. And I've been grateful for groups like ALFA and ATA that provide forums for discussion and training from which new fishermen benefit enormously. However, I've been discouraged by what seems to be a disconnect between ADFG management and our fishing community. This has included inconsistent use of data by ADFG, abrupt changes in management strategies, limited time and opportunities for comment and interaction, and failure to share critical data even as it impacts management decisions. Our futures are all linked, so I ask that we move forward in substantial ways together.

Thank you very much for the work you do to protect the resources that we depend on. And thank you for your consideration of these comments from a new fisherman; concerned, excited, and hopeful.

Sincerely,

James Fischer



Submitted By
jared
Submitted On
12/28/2017 8:44:22 PM
Affiliation
fisherman

I am only going to be submitting comments on a few of the many proposals that have been submitted this board cycle. I would like to make a general statement that I find a few of the proposals in this cycle offensive. As a seine stakeholder, I have never even considered submitting a proposal that would take wild stock area away from gillnet stakeholders to benefit myself. I believe these types of proposals should be opposed regardless of the beneficiary.

PROPOSAL 54
5 AAC 32.125. Lawful gear for Registration Area A.

Reduce the maximum number of pots per vessel in the Southeastern Alaska Area commercial Dungeness crab fishery from 300 pots to 240 pots.

Oppose: This proposal does not guarantee less gear in over saturated areas. There is nothing to stop more permit holders from moving into the over saturated areas once the number of pots there has been reduced. Furthermore, I believe this will lead to permit holders feeling stuck in such known areas. Fisherman would have less pots to explore with, which would increase the time and expenses of exploratory fishing. In conclusion the likelihood and incentive for exploratory dungeness crabbing would be reduced, while the goal for reducing saturation in overly saturated areas would not be met.

PROPOSAL 55
5 AAC 32.125. Lawful gear for Registration Area A.

Increase the maximum number of pots per vessel in the Southeastern Alaska Area commercial Dungeness crab fishery from 300 pots to 400 pots.

Support: Although I acknowledge that there is possibility that latent permits may enter the fishery as "additional" permits, I still think this is a good idea. At a 1/3 redemption rate it would not take very many permits being "stacked" to reduce the overall number of pots in the water. It would also be a good entry option for crew members, allowing them the ability to purchase permits to be used on the vessel they are working on.

PROPOSAL 166
5 AAC. 33.366. Northern Southeast seine salmon fishery management plans.

Allow a weekly commercial fishery targeting pink salmon with purse seine gear in District 12.

Support: I have been seining in Northern Southeast since 1999. I believe the current management plan is not working. I don't think this will magically fix everything, but it is a good idea (from a fisherman that knows as much about the north end as anyone), and a great start.

PROPOSAL 167
5 AAC 33.350. Closed waters.

Close waters beyond one half mile from shore in Districts 12 and 14 to commercial fishing for salmon with purse seine gear.

Oppose: I am not sure what to think about this proposal. The way it is written it sounds as though [REDACTED] is trying to be helpful, and give us more opportunity, but the reality is that this proposal would be devastating to our seine fishery in sub-districts 112-14, 112-16 and sub-districts 114-25 and 114-27. Our fishing opportunities are already very limited in Northern Southeast. Pink salmon tend to come in "pulses", both on and off the beach. Restricting us to 1/2 mile would have a severe negative impact on access to pink salmon in sub-districts 112-14, 112-16 and sub-districts 114-25 and 114-27. I can not be certain why [REDACTED] felt compelled to submit this proposal, but given that he is a SE gillnet stakeholder, I have my suspicions.

PROPOSAL 168
5 AAC 33.350. Closed waters.

Close certain waters of Districts 12 and 14 to commercial salmon fishing with purse seine gear.

Oppose: Although I share [REDACTED] concern about recently declining Chinook stocks, there is zero science to support his theory that this proposal would aid in their conservation, and thousands upon thousands of seine fish tickets from districts 12 and 14 to show that the seine fleet harvests an infinitesimal amount of Chinook salmon in these areas. I do find it interesting that [REDACTED] is more than willing to eliminate a seine fishery that is persecuted in Icy and Chatham straits, but did not put in a similar proposal to close gillnetting in District 11 and 15, where the Chilkat and Taku rivers are located. Perhaps [REDACTED] a reason for this, other than the fact that he is a SE gillnet stakeholder, maybe he will be so kind as to clarify his reasoning during his testimony.



To: ADF+G Boards Support

Company: _____

Fax #: 907-465-6094

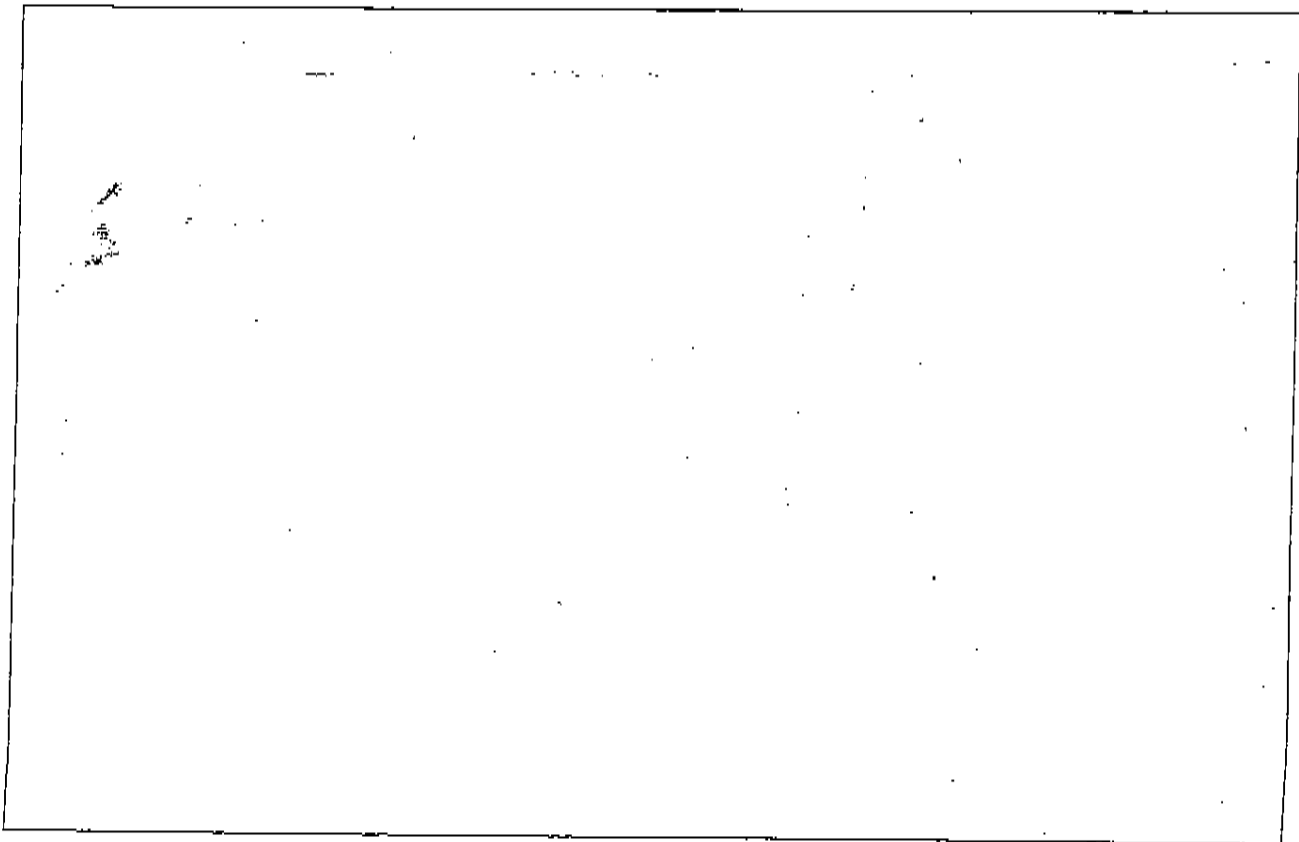
Date: 12/27/17

From: Jean Arnold

of pages 3 including cover

Re: BoF SE AK Comments of Proposals 98, 99, 105, 106, 94, and 104

Message





Dear Board of Fisheries

I support proposal 98, 99, 105, and 106. I am strongly opposed to proposals 94 and 104. As part of my comments I've attached a letter to the editor of the Sitka Sentinel that I submitted in August of 2017.

Thank you for your time.

Jean Arnold

Page 2, Daily Sitka Sentinel, Sitka, Alaska, Wednesday, August 30, 2017

Letters to the Editor

Fish Food

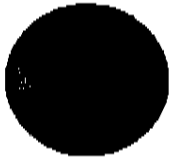
Dear Editor: Kings are in trouble. They're starving. Most fisher groups are asked to help. Commercial, sport, charter and subsistence fishers accept greatly reduced harvest levels to protect the resource.

But for one group of mostly Lower 48 boats, it's "business as usual." Sitka sac roe herring permit holders still continue to get the same allocation for 20 percent of our herring biomass.

That's salmon and other game fish's food.

Jean S. Arnold, Sitka





ANB/ANS Grand Camp
Portland, OR October 2017



Resolution #17-01

Title: Restoring Subsistence Priority for Herring

WHEREAS, Pacific herring are considered an ecological keystone species for the role they play in transferring energy for primary and secondary producers to upper trophic level species, and

WHEREAS, Pacific herring have been utilized by Alaska Natives since time immemorial and are considered an ecological keystone species, and

WHEREAS, subsistence herring egg harvest surveys conducted by the Alaska Department of Fish and Game's Division of Subsistence (DoS) that in the last eight years subsistence needs have been met less than 50% of the time, and

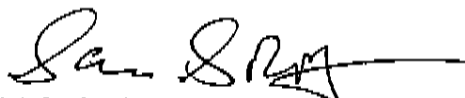
WHEREAS, the results of the DoS subsistence herring egg harvester surveys show that the State of Alaska has failed to provide adequate opportunity for subsistence harvesters to meet their needs, and

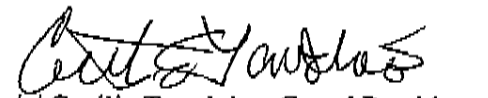
WHEREAS, twice in the last 6 years the State of Alaska has grossly overestimated the spawning biomass of the Sitka Sound herring stock resulting in a flawed guideline harvest level and put the future of the stock and the ability of subsistence harvesters to meet their needs at risk.

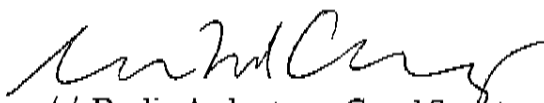
NOW THEREFORE BE IT RESOLVED, that the ANB/ANS strongly support 2017-2018 Board of Fish proposals 98, 99, 105, and 106, and strongly recommend that the Board of Fish do pass these, and

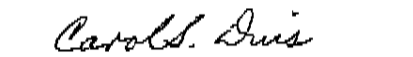
BE IT FURTHER RESOLVED THAT the ANB/ANS vehemently opposes 2017-2018 Board of Fish proposals 94 and 104 and recommends the BoF eliminate these proposals

BE IT FINALLY RESOLVED, that the ANB/ANS strongly supports 2017-2018 Board of Fish proposals 98, 99, 105 and 106 and recommends the BoF adopt these proposals.


/s/ Sasha Soboleff, Grand President
Alaska Native Brotherhood


/s/ Cecilia Tavoieiro, Grand President
Alaska Native Sisterhood


/s/ Devlin Anderstrom, Grand Secretary
Alaska Native Brotherhood


/s/ Carol Duis, Grand Secretary
Alaska Native Sisterhood



Submitted By
Jeff Budd
Submitted On
12/9/2017 7:15:14 AM
Affiliation

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PO Box 1351
Sitka, Alaska 99835

I am in support of Proposal 99 (submitted by STA) to reduce the commercial catch for conservation, and opposed to proposal 94 & 104 which would roll back subsistence opportunities).

Submitted By
Jeff Budd
Submitted On
12/9/2017 7:11:32 AM
Affiliation

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Sitka, Alaska 99835

Dear Board of Fish, I am writing to ask you to be be very conservative in your herring catch limits. To my mind the entire eco system relies on herring for their support in one way or another. To continue to over fish herring is a long standing mistake. I know it is a million dollar fishery and big money talks - but from my reading there needs to be a major cut back in the fishery to preserve it and bring it back to the past levels. You will need to have a backbone to do that. Thank you. Jeff Budd



Submitted By
Jeff Farvour
Submitted On
12/28/2017 11:30:30 PM
Affiliation

December 28, 2017

Dear Members of the Board of Fish,

My livelihood is 100% dependent on commercial fishing of which trolling makes up the bulk of that income. I live year around in Sitka and love it here. For many of us there are few options for jobs as is the case in many of Alaska's coastal communities. Many of us did not have a leg up or family to guide us into fishing but we are dependent on the resources and committed to long term sustainability of them. My 8 years serving on the Advisory Panel to the North Pacific Fisheries Management Council gave me clarity to insights of the many aspects of decision making that foster the managing of fisheries and a deep appreciation for our Board of Fish and Game members and process.

As you know, many of the proposals you'll be considering can have serious consequences not just for existing fisherman but for future fisherman as well. Which brings me to my point of asking that as you go through your agenda and deliberate to please keep the well documented declining access of young Alaskan's to our fisheries at the forefront of your considerations.

A couple years ago, I gave a presentation at a fisheries workshop on how policy decisions can affect access to fisheries. Id be more than happy to share that with you.

Draft Chilkat/King Salmon and Unuk Action Plans (AP):

First off, I'd ask the Board for fair and equitable treatment of all sectors in bearing the burden of conservation of SE wild chinook while respecting the allocations to the sectors and ensuring that any action taken under the APs or otherwise do not affect the overall allocation. I fully support and depend on conservation based management for king salmon and all of our fish for that matter. It is the underpinnings of the successes in fisheries management. However, the 2017 summer troll season was disastrous for those of us that depend on King Salmon. I know that biology is uncertain but some measure of predictability and stability needs to be in my business plan. I could not predict being literally cut off from catching 20% of our allocation, about a \$2.3M loss to the fleet in ex vessel alone in addition to a nearly full June spring troll closure. This happened right after I upgraded from a smaller wood boat to a fiberglass boat that cost 4 times what the old wood one was worth. Significant losses also occurred to processors, to the State and communities through raw fish tax. Consequently, at the same time the sport fleet was exceeding their allocation by what looks like 19%. On its face this looks like a reallocation with wide spread negative impacts for trollers which is one of Alaska's most important salmon fisheries on a resident basis. I ask that you address this problem through in-season management for the non resident sport sector with as little impact on resident sport fisherman as possible.

If the Board decides that using options contained in the AP's is the best approach for addressing this issue then I would defer my comments to the work and comments that the Sitka AC has done on the APs. However, I do believe that a much more reasonable decision for the Board is for a more surgical approach that is lined out in Mr Tad Fujioka's detailed comments (and likely others) on this matter. Doing so would achieve the necessary conservation goals and have far less economic consequences.

Proposals: In general, I find myself supporting all the recommendations made by the great work of the Sitka AC with an emphasis of:

Support: 116, 127, 129, 137, 144, 173, 174, 176, 177, 180

Support 181: This proposal is important to realizing more value per king since kings are larger and ex vessel is higher in August and it would provide more fresh troll caught kings through out the summer. Additionally, I believe the proposal would help provide opportunity to newer participants in the troll fishery who were not able to fish effectively in the July derby opener, because of weather and/or experience giving them one more chance at making up what they missed in July. These scenarios are ever more important as our fisheries become increasingly difficult for young folks to enter and be successful at.

Oppose: 113, 117-123, 127, 132, 133, 134, 139, 146, 178

In closing, Id like to thank the Board for your dedication to this great deliberative process and welcome you to Sitka.

Sincerely, Jeff Farvour Sitka AK



Submitted By
Jeff Wedekind
Submitted On
12/28/2017 3:39:20 PM
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RE: UNUK RIVER KING SALMON ACTION PLAN 2018

I own and operate Chinook Shores sport fishing lodge located in Clover Passage, West Behm Canal since 2005. We lodge up to 28 anglers, operate seven fishing boats, employ 8 people and bring approximately 600 non-resident anglers to Ketchikan May-September.

There are five other similar size or larger fishing lodges located in West Behm Canal along with two marinas, and about 30 smaller charter operators who pump tens of millions of dollars into Ketchikan's economy each summer. All these businesses benefit or rely on fishing King Salmon in Clover Pass and West Behm Canal from May through mid-July when all other salmon species are not yet available. Clover Passage has long been an angler's paradise because it offers excellent fishing opportunities in protected waters so anglers can safely fish during poor weather conditions.

Closing all West Behm Canal to sport king salmon fishing would have a very negative impact on the afore mentioned businesses. I would expect a very substantial benefit to the resource to warrant such drastic measures but I fail to see what it would accomplish?

Unuk River Chinook Harvest Rates from Table 1 of the DRAFT 2018 Action Plan.

	5-yr Ave 2007-11	5-yr Ave 2012-16	Harvest Growth	% Increase
Troll All	.19	.34	.15	79%
Net All	.03	.17	.14	466%
Sport All	.05	.05	0	0

Commercial net and troll fisheries have increased Unuk Chinook harvest rates by nearly 30% in the past five years. Sport fishing harvest of Unuk River Chinook has remained at 5% over a ten year period and has dropped to 3% over the past three years which coincides with emergency orders beginning in 2014 restricting daily bag limits for West Behm Canal.

I agree with Action #1 - Sport Fishery, Option A - Status Quo and agree that the EO restrictive daily bag limit could be increased to a larger area through which Unuk Chinook migrate. **I strongly oppose closing more waters of Behm Canal to further reduce the insignificant sport harvest of Unuk River Chinook.**

I am unfamiliar with Action #2 - Commercial Fishery Options, however, it is evident that Option A Status Quo is not adequate to reduce the Troll and Net harvest rates so Options B and C should be considered.

Action #3 - Personal Use Fishery seems insignificant to escapement goals and I have no comment on this option.

Sincerely,

Jeff Wedekind, President Chinook Shores Lodge



Submitted By
Jenn
Submitted On
12/19/2017 4:49:49 PM
Affiliation

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Sitka, Alaska 99835

Dear Board of Fisheries Members,

For the past 17 years, I have lived right next to the ocean in Thimbleberry Bay, Sitka. During this time, I have watched the annual herring spawn steadily decline.

When my firstborn son was a newborn back in 2002, I remember holding him in my arms as I sat on the beach in front of our home watching the ocean brimming with herring. Sea lions cruised past us at arms reach, filling their bellies with herring while the sound of birds celebrating the abundance surrounded us like a joyful symphony.

My sister lives in an old, abandoned fishing village in Prospect, Nova Scotia. A place where the ocean was once also alive with the abundance that only a healthy ocean can offer. Every year, during "herring time" I would tell my sister how it was my favorite time of year in Sitka. I would try to describe to her the magic of watching Thimbleberry Bay come alive with every kind of sea life you can imagine.

In 2003 or 2004 (I cannot recall which year), there was a commercial sac-roe fishery opening right in front of our cabin. We watched one seine boat ground on the reef in front of our home in it's haste to find the big patch. Thankfully, it got off without any damage or oil spilling. And what I remember most clearly is how shocked I was to listen to the fish vacuum actively unloading one seine boat's haul—all day... and all night long. Think of that. All day, and all night. One tiny bay.

Since that fishery, I have watched our bay steadily turn into a herring ghost town. Instead of watching our bay come alive each spring, turning a wonderful milky turquoise color, and covering our beaches with eggs, now, we might not even know the herring were in Sitka Sound at all. The herring haven't shown up for the past several years - at all. The gulls don't sing, the eagles don't come, the sealions are elsewhere, the waters don't turn white, and we don't see any eggs on our beaches.

Honestly, this is one of the most tragic things I have experienced in my lifetime. I keep hoping that the commercial sac-roe fishery will just shut down so we can give the herring time to recover and that my son, who is 15 now can get to experience the herring in our bay once again.

Now, my story, as significant as it is to me and to the other residents of this bay, pales in comparison to the herring stories the Tlingit people have to tell. The Tlingit have been here tens of thousands of years and in all that time they did not mess up the herring resource. When I think of that and compare it to the decline in herring that I've seen within 17 years of living in my home, I am horrified. We need to listen to the Tlingit people and recognize that they are much better stewards of this resource than we are. What they have to say needs to be honored. They obviously understand resource management!

Not only do I support Proposal 99, to cap the sac-roe fishery at 10% of biomass, I feel it is the minimum that should be done.

In fact, what I really think ought to happen is to completely shut down the commercial sac-roe fishery. With the massive increase in whale numbers in Sitka Sound combined with the overwhelming number of Sitka residents who can personally testify to witnessing a massive decline in herring over the past decade (and longer), it seems only reasonable that the Board of Fisheries would err on the side of caution when it comes to such an ecologically critical species as herring.

Thank you very much for considering my comments.

Jenn Lawlor



Submitted By
Jim Borbridge
Submitted On
12/28/2017 2:49:47 PM
Affiliation

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My name is Jim Borbridge. I was born and raised in Sitka. I have fished on a commercial troller and have worked for processors here in Sitka. I am also a subsistence user of herring and herring roe. I am writing to express my concern about the shrinking biomass of herring in Sitka sound and the surrounding area. Herring, though not recognized as a foraging food, comprises a large portion of the diet used by salmon, halibut and other fish fished for commercially in the Sitka area. There may not be a correlation or maybe there is a correlation between the lower population of fish caught and the lower biomass of herring in the Sitka Sound. Logic and common sense would suggest there is a correlation.

I have done my share of herring fishing and herring roe gathering as a native of Sitka and still look forward to the seasonal return of herring. I would like to see a reasonable management of the herring population to bring back the herring biomass as it once was. I can remember going past Star Gaven point and seeing a whi



Submitted By
Jim Conrad
Submitted On
12/27/2017 9:29:20 AM
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Proposal 165

I oppose this proposal. The reasons stated in this letter are as relevant today as they were in 2012.

RE: Tsiu River March 15, 2012

Ladies & Gentlemen,

I was very disturbed to read a recent article in the Ketchikan newspaper regarding the reversal of a controversial board decision aimed at reducing sport-commercial conflicts on the remote Tsiu River near Yakutat. It appears to me that amended Proposal 30L, to close a portion of the river to commercial fishing to provide a sport-only zone, was a very reasonable and equitable solution.

When I originally learned of its 4-3 approval I was ecstatic. However, when I later learned that the Board of Fisheries had apparently later caved to commercial fishing interest pressure (disguised a new information but really wasn't) and reconsidered the proposal, subsequently voting 3-4 to overturn the original approval of amended Proposal 301, I was stunned. I thought that this type of exercise of raw political pressure was reserved to the lower 48 states and specifically to Chicago. To say that I'm disappointed would be a gross understatement.

I am from California I look forward to at least one or two annual trips to Alaska to fish, with my favorite destination being the Tsiu River. I typically spend around 55,000 on each of these trips and my half dozen fishing buddies do the same. I know that we're just the tip of the iceberg and if you extend that type sport fishing expenditure to multiple fishing lodges on the Tsiu River for an entire season, you're looking at several million dollars per year. It seems to me that sport fishing's economic contribution to the Tsiu River fishery shouldn't be trumped by commercial fishing. Sport fishermen don't appreciate being harassed by commercial harvesters, as they heard salmon into nets using boats. Let the commercial harvesters have their section of the river and let sport fishermen have theirs. That's the equitable solution and that's what amended Proposal 301 is all about.

In conclusion, I urge you to reconsider your actions and to approve amended Proposal 301.

Jim Conrad

3723 Brand Crest

Encinitas, CA 92024-5505



Submitted By
Joe Daniels
Submitted On
12/28/2017 4:17:42 PM
Affiliation

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To whom it may concern,

I am a commercial salmon troller based out of sitka, ak and adamantly opposed to any spring closure of Chinook salmon. The proposed access restriction to this resource will have devastating effect on my fishing business. I have a very legitimate concern for the future of my business and will not be able to ride out what I estimate as around a 40 percent reduction in my gross salmon production if I am prohibited from access to Chinook in the Spring. I urge the powers that be to reconsider prohibiting my access to the only resource I own a permit to harvest. It seems ADFG has zero concern for what is at stake here and is not being fair to Commercial Fishermen and not considering ways to get us access to the resource that we are entitled to.

Sincerely,

Joe Daniels

F/V Amnicon, Sitka AK

503-704-6466

507 Katlian St,

Sitka, AK 99835



From: Joe Lindholm
To: spawn on kelp--SE ALASKA
Subject: Friday, September 29, 2017 9:44:50 AM
Date:

I am in favor of an alternate style of fishery for the SE roe herring fishery. The existing permit holders would have the option of either participating in the existing herring for roe fishery, or convert to the proposed spawn on kelp fishery.

The pluses to this are: A) The fishers that elected to stay in the herring fishery would have a much better chance to "make" a season because the fleet would be smaller

B) The fishers that elected to pursue the roe on kelp fishery would not hurt the existing fishery in any way because there would be no killing of fish...

C) The permit would generate more revenue to the state (thru higher grosses) and permit values would go up

D) Additional employment would be enjoyed (most likely by the community of Sitka)

The minuses are: There is some belief that this fishery would dilute the existing roe on kelp market. The open pond method of harvesting kelp produces a much thinner product, therefore the product is not the same.

Arguments there will be, but substantiation of this is available. It can be likened to frozen salmon versus canned salmon - both salmon but different markets.



Submitted By
Joel Randrup
Submitted On
12/27/2017 10:00:13 AM
Affiliation
Fisherman

To the Board of Fish,

I support proposal 235.

Proposal 235, Southeastern Alaska Area Dungeness Crab Fisheries Management Plan and Fishing Seasons for Registration Area A. I agree with the comments used by the board in the proposal under What is the issue you would like the board to address and why? I have a southeast drift gillnet permit and a Dungeness crab permit to give me an economic opportunity. That opportunity was lost this season because the Dungeness crab season was cut short. I started crab fishing in a slow area this summer, and I correctly guessed that it was slow fishing in other areas so the season would be cut short. I put my pots away and fished for salmon. The salmon fishing area was not near the crab fishing and I put my pots away so I would not be concerned about them being in the water when the season closed. I know of several permit holders in the area I crabbed that did the very same thing. I also lost economic opportunity this fall because the season was cut short. I support this proposal and thank the Board of Fish for generating it.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/27/2017 11:59:56 PM
Affiliation
Fisherman

To the Board of Fish,

I support proposals 141, 154, 156, 157, 169, and 170. I own a southeast drift gillnet permit and I am a USAG member, however, these comments are my own. These proposals submitted by USAG appear to address in a fair and balanced manner the imbalance of the gear groups in both the wild and enhanced stocks as well as maintaining conservation measures for sockeye.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/28/2017 8:51:44 AM
Affiliation
Fisherman

To the Board of Fish,

I support proposal 160, Closed waters.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/28/2017 9:18:46 AM
Affiliation
Fisherman

To the Board of Fish,

I support proposals 195 and 196, General provisions for seasons and bag, possession, annual, and size limits for the salt (and fresh) waters of the Southeast Alaska Area. To manage our fisheries sustainably we have to know all the outputs from that particular fishery. The unguided sport fisherman is not fully or at all accounted for so we don't know what they take home. The commercial and charter fisheries are managed using fish tickets and a log book, respectively. There needs to be a more accurate method of tracking the outputs instead of the statistical model being used, the creel survey, which misses the unguided sport angler that never goes to a dock. In the absence of implementing a tracking system the annual limits would be a very good start.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/28/2017 10:28:39 AM
Affiliation
Fisherman

To the Board of Fish,

I oppose proposal 142, District 13: Deep Inlet Terminal Harvest Area Salmon Management Plan submitted by NSRAA. This modification to the rotation schedule between the net groups is excessive and not a fair way to address the enhanced salmon allocation imbalance. A 1:1 rotation is both fair and was done before.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/28/2017 12:47:05 PM
Affiliation
Fisherman

To the Board of Fish,

I oppose proposals 140, 143, 145, 153, and 155 submitted by SEAS. These proposals are excessive in trying to correct the enhanced salmon allocation imbalance, they do not address the wild stock salmon allocation imbalance between the gear groups, and are incorrectly asking to remove the conservation measures for sockeye salmon. Smaller adjustments in the enhanced salmon allocation seem more reasonable as suggested in other proposals.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/28/2017 5:50:18 PM
Affiliation
Fisherman

To the Board of Fish,

I support proposal 103, Management plan for herring spawn on kelp in pounds in Sections 3-B, 12-A, and 13C and District 7. The reasons given for support that are listed in the proposal are valid for the economic value, and the bait fishery was not prosecuted for many years until just recently. However, the value of the bait fishery may not be as drastically impacted by changing the allocation of the guideline harvest level as proposed, but only switched to favor the pound fishery. I would suggest to change the allocation of the GHIL to 60% S.O.K. and 40% bait with the leftover bait harvest, if any, allocated to the S.O.K fishery. This may help add economic value to the S.O.K. fishery as suggested, and in times of low herring abundance there could be prosecution of both fisheries.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
12/27/2017 6:08:28 AM
Affiliation
Fisherman

To the Board of Fish,

I oppose proposal 54 and 55.

Proposal 54, Lawful gear for Registration Area A. This proposal would likely increase the fishing pressure on the grounds because there would be more pot lifts if permit holders have less pots to fish. The value of the permit would be affected due to the proposed reduction of pots because the permit/pots are usually sold as a package. I own a 300 pot permit and this proposal would reduce more pots from my permit which is an unfair economic hardship and would reduce my business assets. Sea otter predation is a state and federal problem that is not being managed adequately. The crab fleet should not be penalized for inaction to address the economic and social impacts the invasive sea otter has on all Alaskans. The pot reduction concept is not a logical way to manage the sea otter because pot reductions would continue until we don't have enough pots to make a living. I oppose this proposal.

Proposal 55, Lawful gear for Registration Area A. This proposal would unintentionally increase the pots in the fishery if permit holders do not choose to stack permits. According to the teired system we currently have in place if the maximum number of pots a vessel can fish is 400 then the tiers would change to 400/300/200 & 100? I think the regulations from CFEC is 100%/75%/50% & 25% of the maximum number of pots allowed? Crab fisherman are crowding each other because we have lost grounds due to sea otter predation and the absence of a sea otter management plan. If the soak times are short then possibly we could add another escape ring to the pot which may give sub legal crab more oppotunity to escape. I agree with the concept of permit holders stacking permits to vouluntarily reduce their pots and not having a reduction forced on the indavidual permit holder, however, I oppose this proposal as written.

Thank you,

Joel Randrup



Submitted By
Joel Steenstra
Submitted On
12/23/2017 1:13:31 PM
Affiliation

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To Board of Fisheries,

My name is Joel Steenstra. I am a power troller (FV Glory) and a Charter business owner (Alaska Wide Open Charters) out of Craig, Alaska. I wish to comment on the chinook action plans that will be before the board.

I do not agree with the ADFG plans to do a fleet wide shut down of the troll fleet in mid march which is in option B and C. Mid March through the end of the winter troll fishery is a very important time for the smaller boats in the power troll fleet out of Craig and other communities. The weather gets nicer and we have fish show up in numbers where it is profitable to leave the dock. A mid March closure would cause economic hardship for the small boat fleet. With record high prices it is important to keep the fleet fishing particularly after last years shut down of the second king opening. I would propose to the board to ask the ADFG to consider keeping certain areas open for the last part of the winter fishery, where trollers are less likely to intercept kings from the rivers in trouble. My suggestion would be the mixed stock areas like 103, 104, 113, and 183. There is too big of an economic loss to trollers for the ADFG to not consider a plan like this. This would benefit the entire troll fleet as boats in communities like Ketchikan and Juneau could travel to these areas that are open. It might be years before these rivers rebound due to ocean conditions so we need a plan that doesn't kill the small boat troll fleet while we wait for ocean conditions to improve.

For the spring hatchery openings, it is also important to give the troll fleet as much fishing opportunity as possible. Every effort should be made to identify areas with a lesser chance of intercepting natural AK kings, and they should be opened, expanded, and added too to provide economic opportunity to the troll fleet.

Thank you for your consideration,

Joel and Leanne Steenstra



Submitted By
John Clark
Submitted On
12/19/2017 12:20:05 PM
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Proposal 63. Although an 'experimental fishery' could provide minimal data on the distribution of small populations of red king crab, careful consideration of what type of information should be collected, distribution of effort, and other factors would make this data much more useful. Many of these red king crab stocks are likely distinct and marginal, resulting in likely overharvest if a fishery is simply allowed to proceed without specific plans and direction. There are no estimates of appropriate guideline harvest levels or a plan on how effort will be distributed. I would recommend that, if information on southern red king crab stocks is a high priority, ADF&G and interested users should devise a more coordinated and considered research plan to collect this information.

Proposal 64. I strongly oppose this change in management guidelines until ADF&G can develop a red king crab management plan that ensures a healthy red king crab resource, MSY strategy, and allocation among user groups consistent with Alaska Statutes and Constitution. A 50,000 (or 100,000) lbs guideline harvest level would mean that abundance is very low region-wide and likely only a few, or even one survey area would be open to harvest. Only a small fraction of a survey area is good red king crab habitat and trying to crowd over 60 boats, each with 20 pots, into a limited area creates difficulties for both management and the fleet. The contribution of unsurveyed areas to the total guideline harvest level is also highly arbitrary and suspect. For example, in 2017, over 67% of the harvestable biomass (135,000 lbs) was apportioned to unsurveyed areas with no information on stock health or abundance. In past years this percentage was around 30% (this is the average percent of the historical harvest coming from unsurveyed areas). The 200,000 lb threshold was achieved because of this dubious increase in harvestable biomass from unsurveyed areas. Commercial harvesting at lower threshold levels would significantly increase the potential for gross management error, overharvest, and simply allowing a fishery by arbitrarily increasing harvests in unsurveyed areas.

Proposal 234. I strongly support this proposal for the reasons presented by ADF&G. The only way to competently manage resources that continue to be in a less than healthy state is to collect information on the harvest of this resource, at a minimum.

Proposals 137, 185, 188, 190, 191, 192, 194. I support these proposals which will provide more reasonable opportunities for Alaska residents to achieve personal use needs. Currently, most of the personal use harvest of salmon fall under sport fish regulations, which limits the number of fish and type and amount of gear used. This in turn limits the ability of many Alaska residents to achieve full use of their personal use rights to provide for their families because of time or economic constraints. Each Alaska resident deserves the opportunity to provide a healthy and sustainable fish supply for their families. Concerns over some users who may try and over-exploit the salmon resources can easily be addressed by putting limits on personal use permits. At a minimum, it would be interesting to initiate a personal use fishery as suggested in one or more of these proposals and evaluate the interest in this fishery, the impact of this fishery on the resource and other users, and the ability of ADF&G to competently monitor and manage a more liberalized personal use fishery.



Submitted By
Mr. John Murray
Submitted On
12/20/2017 1:01:03 PM
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Self

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Proposal 99 Support: As amended by the Sitka AC. I believe the language added by Sitka AC reflects the concerns I have those being; 1) conservative /precautionary approach to management of this fishery 2) In Sitka there has a growing predator population -whales and sealions .They take unknown amount of herring.3) I support a more broad ecosystem approach here.Example :see 2) also climate conditions,warming waters and ocean acidfication.

Proposal 116 Support: I feel this is a common sense approach to controlling the growth in guided sport catch of Black cod. It offers controlled growth and oppoutunity without displacing current harvesters.

Proposal 127 Support :This proposal protects the local resident user from encroachment into this fishery by guided charters. Resident should not have to compete with charters for food fish.

Propoal 133 Oppose : This a backdoor way to close trollers out of certain grounds under the guise of conservation.While leavig the gillnet fleet open..Example of this is the chum fishery in Chatham straits/lcy straits areas. This will also be addressed in ADFG Stocks of Concern conservation plan.

Proposal 134 Oppose :I oppose this for some of the same reasons above.Mostly this will be dealt with via ADFG SofC POLICY.

Proposal 173 Support: Good language to let the troll fleet catch returning enhanced chum salmon in District 12/14. See SE Allocation Task Force recommendations.

Proposal 174 Support;Same rational as 173 . this should also help trollers get closer to the Enhanced Allocation Plan percentage.Trollers are way benind in those percentages.

Proposal 178 Oppose:this a reallocation within troll fleet that harms Sitka area fisherman (who are regionwide). While the winter king harvest sometimes closes early there would clearly be other ways to do what this proposal is trying to do in a more fair and equitable manner.

Proposal 179 Oppose:This proposal would disappointedly affect Sitka trollers(who are regionwide trollers) I beleive there are better ways to go about this .

Proposal 181 Support :As amended by Sitka AC.(I wrote this proposal).Please see my five reasons for your support in considering this for APPROVAL.I want to add one more big item as #6 .That being we need this proposal as a means to support 1) the new entrant to trolling 2) the up incomer 3) the fisherman who misses the king harvest during the first July opening. It gives those fisherman another shot to try and help put together a season.Kings can be a big part of ones economic success in this fishery. I would like to support the "new guys " exspeccially because they are the ones who are the future of our fishery.This is not just an issue here I beleive its statewide. Its important to seriously weigh this in deliberations.

Proposal 186 Support: As a clarity issue this is important for all involved.

Proposal 195 Support:While there might not be a conservation problem. I see this proposal as a means to a harvest number by nonresident anglers that reflect a fair amount to harvest.As it stands now under current sport regs a nonresident is allowed a very generous potential daily and possession limits. The question you have to anaswer is.How much is enough ?It is too open ended currently I beleive .One could take a lot of fish when all you have to do is PROCESS the catch and your legal to catch another bag and possession limit.Sorry the wild west daysare over.

Proposal 196:Support Same rational as above.How much is enough?The good old days are over we need to leave some for the critters. Think what is reasonable.



Submitted By
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12/28/2017 9:46:59 AM
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Comments concerning SEAK Stocks of Concern Action Plan;

As a longtime resident and a fisherman(troller) living in Sitka I want to make some general comments on this plan.

FIRST :let me state rebuilding these stocks is of PARAMOUNT importance .SECOND: this is a many faceted problem in that it will affects all gear groups in SE. THIRD: these are uncharted waters for most all of us here,in that we have never dealt with SoC before in SE. FOURTH: the outcome of decisions made during this meeting could /will have large economic effects exspeccially to certain gear groups. FIVE: these decisions will be in AFFECT for at least one life cycle of the King salmon 4/5 years.

Something I'd really like you to consider is the concept of rebuilding and conservation of these SoC along with providing opportunities.Please see 5 AAC 39.222 Policy for the management of sustainable salmon fisheries (5) (A).

I believe with good use of ADFG biologist,science folks,other ADFG staff, tools already in the tool bag and intelligent, informed and engaged public participation along with the BOF guidance and direction we can come up with something that works.

Just a couple of more personel comments.I make between 20 to 35 percent of my total fishing income from trolling in the time period set for closure or VERY reduced opportunities in mid March through the end of June per Draft Plans for Unuk,Chilkat,King salmon . Lastly this is a particularly MAJOR hit to new or prospective entrants into the troll fishery. They are the future right along with these SoC.

Thanks for your consideration and dedication to the resoures of the state of Alaska.

In respect to you and the health of SEAK John Murray F/V Sea Bear Sitka