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Submitted On  
11/7/2021 2:51:14 PM  
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I oppose the ban on limiting or eliminating dip net fishing from a boat on the Copper River. Here is something I am guessing you have not considered. Has anyone done any research on how many lives are saved by the dip net fishing boats alone? Eliminate the dip net fishery and you eliminate the folks who pluck people out of the water or rescue the idiots who wade out to sand bars then can not get back to shore. What do they do? Call 911. Only 911 gets volunteer firefighters and volunteer EMS folks. None of which has water rescue equipment. Troopers also do not have boats and rely on the generosity of the dip net fleet for rescue. How do I know? I was a firefighter and EMT in Kenny Lake for 10 years. I can not understand why someone would propose to eliminate this life sustaining fishery from the safety of a certified captain and crew. If you are worried about the number of fish getting through to spawn, then up the escapement goal but do not eliminate such a well run and needed access opportunity, especially for us elderly folks who enjoy catching our own food.



Submitted By  
Damien R Delzer  
Submitted On  
11/9/2021 12:30:19 PM  
Affiliation

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Dear Board of Fisheries,

I am writing in response to several proposals that directly impact Alaskan's abilities to provide healthy and affordable protein to feed themselves and their families.

I oppose Proposal 6, 8, 9-11, 12, 14-15, and 19-20.

Reporting dipnet harvest mid-season is unnecessary as ADFG manages based on sonar counts. Proposal 6 further restricts an already highly regulated fishery.

Proposals 9-11 are extremely detrimental and directly limits the abilities of those with physical limitations from trying to provide for themselves and their families. Boat fishing allows those who cannot scale a shale slide or climb a cliff to still have an opportunity to harvest healthy protein. This would also further increase crowding and land use conflicts.

Proposal 12 is entirely unnecessary. I have fished both from shore and from boat and there has never been a time when a boat interfered with my shore fishing as my shoreline radius is not likely to ever be within the area of the boat.

Proposals 14-15 are again unnecessary. King's don't become entrapped by the legal dipnet mesh.

Proposals 19-20 are again unnecessary as ADFG are able to properly manage through the sonar counts and restrict and reduce harvest accordingly.

Finally, I support Proposal 18 to reduce the congestion across from Haley Creek, This will not result in increased or decreased harvest, but will allow better spacing between fishing parties and reduce risk of accidents.

Respectfully,

Damien R. Delzer, O.D. (Fairbanks and Valdez)



Submitted By  
Daniel Bond  
Submitted On  
11/15/2021 7:31:07 PM  
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I wish to voice a strong objection to proposal 9, eliminating the use of boats in the Glennallen sub district.

My family and I rely on the ability to responsibly harvest salmon under a subsistence permit on the Copper River. This proposal would greatly reduce our opportunities and limit the number of fish we count on throughout the year. A concern was voiced in the proposal regarding the number of fish reaching the spawning areas; however, the annual harvest from subsistence is significantly lower than that of commercial or personal use. I believe it would be more beneficial for all parties to lower the limit of fish per permit rather than close off access through the use of boats. We are very fortunate to live in a state with subsistence opportunities, and I believe they should be protected.

Thank you for your time,

Dan Bond



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Wasilla, Alaska, and I participate in the commercial, subsistence, and public use salmon fisheries of the Prince William Sound Region. I commercial fish and I depend on this fishery for my family. So restricting the fishery really hurts me and our community. It's very important because I depend on the season to survive the winter. I understand that everyone else also depends on this fish so we should all work together to make sure that the river is healthy with fish and if there's anything we can do to help like maybe put a stop to jet boats in the river because they destroy eggs that are hidden in the banks.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Danikt Konev  
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Submitted By  
Danny Carpenter  
Submitted On  
11/15/2021 10:21:23 PM  
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Proposal 5 Strongly do not support. There is currently an adequate escapement for the Copper River, but not an adequate way of counting it. By almost doubling that number by making the escapement "optimal" and not having an accurate method of proving it this proposal is just a way to eliminate the commercial fishery on the Copper River Flats by a user group that isn't even based in the Copper River drainage. It wouldn't matter how strong the Red run is or the King run for that matter unless the escapement number could be proven. When was the last time Fish and Game had an escapement of 40,000 Kings? We should all agree that adequate escapement of Kings are important, but arbitrary increases of an escapement number that has worked for decades is not the way to do it. All users should share in this burden. I worry that the unregulated sport fishery that can catch and release as many Kings as they can hook with some anglers bragging about 70 hookups in a day is a bigger issue. Is there a regulation about sport fishing on spawning beds in the Copper River watershed? In my opinion this proposal is simply a redistribution of the whole Copper River Sockeye and King run to upriver users. Fish and Game won't be able to prove an "optimal" escapement of Kings and Area E fishermen will be displaced and Cordova will suffer large economic disparity.

Proposal 6 I strongly support. The current system for subsistence and personal use fishing for reporting creates problems for Fish and Game not having catch numbers for any user groups except commercial fishermen until late in the year if not until after the 1st of the next year. Even when they tabulate the number they get in October I would argue that likely those numbers are not accurate. Without requiring timely reporting users can at best forget how many fish they caught on a given day or at worst under report making it look like their gear group is not get their share. I participate in both subsistence salmon and sports caught shrimp and I guarantee that their are users in those fisheries under reporting their catches because they can. There needs to be a better way for all users to timely and accurately report.

Proposal 7 Strongly support.

Proposal 8. Support

Proposal 9. I didn't even know this fishery existed until I read this proposal. My main concern with a guide subsistence fishery is that if even a small percentage of folks that can legally subsistence fish by dipnetting out of charter boats in an area that has been limited by availability of a limited number of fishwheels the fishery will be over allocated and the newest commercial fishery will become unmanageable. There is no limit on boats or subsistence fishers...even the other subsistence users are making proposals to deal with this issue. I see it as a huge loophole that some charter operators just figured out and will be cashing in on. The resource won't be able to support it and with the feeble reporting system in place the managers of the fishery will not be able to manage for. Why would I get a personal use dipnetting permit for 30 fish as a head of household if I can get a subsistence permit for 200,300 or even 500 fish and hire a boat to take me above the bridge. This will become a huge reallocation that most other users never saw coming.

Proposal 10,11,12 and 13 Support. All of these proposal are examples of problems most folks didn't see coming due to dipnetting from boats and creating an upriver commercial fishery for charter operators. There is no limits to the number of operators and no accurate reporting of catches as things stand.

Proposal 18 Strongly do not support. This is an example of a fishery that has no limits and the commercial operators are requiring even more area. When the charter operators started operating on the Copper it was to drop folks off and pick them up. It's now turned into a trawl fishery fishing from boats in areas that had not been accessible before and it's turned into an upriver commercial fishery with no limits on boats or users. Creating more area for even more charters is not sustainable.

Proposal 19 Strongly support. The commercial fishery in Area E has lost a huge amount of time and area to improve escapement upriver only to see that escapement get allocated upriver. Last season was one of the worst years for fishing time down river with there being very little reduction in fishing time upriver. As commercial fishermen we understand if escapement upriver is lacking we will pay for it in future returns, but if the escapement is then reallocated upriver nothing is gained for any users or the fishery

Proposal 21. Strongly do not support. The upriver users have had no trouble getting their fish with the current dates. If there are shortages of Kings this will just insure that more Kings will have to be released upriver due to run timing.

Proposals 26-29. Oppose. I really don't understand all the thins in these proposals, but I worry that changing subsistence villages is going to have a ripple effect that won't be obvious until it's too late. This last season we already had subsistence fishing interfering with cost recovery at Main Bay causing the fishery to remain closed for an extended amount of time. Last week subsistence fishing in Cordova due to extended closures and Saturday fishing we have increased the subsistence users and harvest dramatically. If even a small percentage of folks from Anchorage figure out they can subsistence fish 3 days a week in Prince William Sound it's going to change the fishery forever.



Thank you for the opportunity to comment on these proposals and participate in this forum. I have to be honest, I've never considered retiring from fishing until responding to these proposals. Our fishery has had it's ups and downs the the oil spill, some record runs, and recently some weak runs. What worries me the most is the increase in users, the lack of accurate reporting, and the difficulty in managing an over allocated resource. Many of these proposals could create big changes for the fishery and the communities involved. I hope you choose wisely

Submitted By  
Darin Gilman  
Submitted On  
8/6/2021 9:48:24 AM  
Affiliation



PC056  
1 of 4

I am commenting regarding Proposal Number 2. This would create a redundant regulation due to the fact that most Ling Cod are taken as bycatch in the other longline fisheries i.e. Halibut and Sablefish. There already is a prior notice of landing (PNOL) of a minimum of three hours in the longline fisheries which includes notice of bycatch of Ling Cod and other species. The fishermen will run into issues if this regulation is implemented due to the fact they will have to cut fishing trips short to call in their non-directed catch before their directed catch. This could cause increased costs of operation and lead to missing weather windows for safe fishing. The majority of Ling Cod are landed in Cordova where the Fish and Game office is five minute walk to the processors this hardly warrants a regulation change for increased efficiency of sampling. This regulation is nothing more than a redundancy and would serve little purpose.

Submitted By  
Darin Gilman  
Submitted On  
11/12/2021 8:59:26 AM  
Affiliation



PC056  
2 of 4

Proposal 5. I am in Opposition of this proposal; it is nothing more than a reallocation of a resource and has no bearing on the sustained yield of Copper River King Salmon.

Submitted By  
Darin Gilman  
Submitted On  
11/12/2021 9:17:22 AM  
Affiliation



PC056  
3 of 4

Proposal 6. I am in support of this proposal. Daily reporting would ensure more accurate numbers of harvest of in river fisheries. Being in the year 2021 it is disingenuous to act like online reporting or calling in to report harvest is a burden on users of the Copper River. The department argues they do not need daily reporting to manage the upriver fisheries, but with an ever-growing user group upriver it is prudent to be able to accurately assess what is being caught day to day. The management of the Upper Copper River fisheries cannot be based solely off Miles Lake sonar counts any longer. The minimum SEG of the Copper River is 360,000, in the year 2020 we narrowly achieved our escapement goal which ended up being about 363,000. The department had no clue till well late into the fall and early winter if they even met their escapement goal, the fish were long and gone by that time. If there was mandatory daily reporting the department could have restricted harvest and ensured, we would have met our escapement goal and not base it solely off hope and feelings of what is being caught day to day. In years of low abundance this proposal becomes ever more necessary to become regulation.

Proposal 7. I am in support of this proposal. The commercialization of subsistence is an issue that needs to be addressed, guides are profiting off people's subsistence needs many of whom that come from Non-Subsistence areas. There is a disconnect between the intent and the reality of subsistence on the Copper River. I urge the board to rectify this loophole before it becomes the new norm on the entire Copper River drainage.

Proposal 18. I am in opposition of this proposal. Expanding one users' groups area meanwhile restricting another's seems counterintuitive to conservation of the resource. Expanding a line further downstream would just move the congestion of boats further down and would not resolve the issue. The proposed area increase is also a crucial area for salmon to rest before ascending Wood Canyon.

Proposal 19. I am in support of this proposal. It makes sense to have a shared burden of conservation on the Copper River.

Proposal 20. Support

Proposal 21. Oppose

Proposal 27. Opposed. There is ample opportunity for subsistence users in the Prince William Sound and Copper River area. Opening it 7 days a week could lead to unnecessary pressure on wild stocks in all of area E.

Proposal 28. Oppose. The reduced bag limits of the lower copper reflect more access to other protein sources i.e. halibut rockfish cod etc.

Proposal 31. Oppose. It could lead to an unknown harvest increase on the sport fishery.

Proposal 38. Support

Proposal 39. Support

Proposal 40. Support

Proposal 41. Support

Proposal 42. I support my proposal; it is time to address the inequity of the trigger percentages in the Prince William Sound Management and Salmon Enhancement plan.

Proposal 43. Support

Proposal 44. I support my proposal. This is just to clean up the language of the regulation to ensure it is being implemented on what its intent was and how it is being interpreted by the department currently.

Proposal 45. Oppose. This is nothing more than a reallocation of a resource between gear groups. The setnet fleet has already been over their allocation percentage 12 out of 15 years. This would just further put them over their allocation by disenfranchising drift gillnetters in the Main Bay Subdistrict.

Proposal 46. Oppose. Due to the Department and PWSAC's cautious management approach to Esther chum and Coghill sockeye this would lead to the reduction of time and area for the drift gillnet fleet.

Proposal 48. Oppose

Proposal 49. Oppose

Proposal 56. Oppose. Could lead to the industry being more privatized. Already has a large barrier to entry would just make it more difficult to buy in.

Proposal 58. Oppose.



PC056  
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November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I commercial fish in Cordova during the salmon season. I have participated in the Prince William Sound and Copper River Gilnet fishery since 1983. I also own property in Cordova. I make my living commercial gilnet fishing out of Cordova and have for the the past 38 years. I consider Cordova AK my summer home from May thru September each year. I have seen over the time I have participated the escapement on the Copper river increase (double) to meet up river demands for more fish. As a Commercial Fisher we have lost area and time to increase upriver escapement. Every three years at the Board of Fish meeting there is increased pressure to restrict commercial fisheries. In the past 8 years we have seen the escapement past the Miles lake sonar exceed the goal most years, and some years by many tens of thousands of extra fish. In my opinion it is because of this over escapement that is playing a large part in the diminishing returns to the copper as there is no data as to what is actually reaching the spawning beds. All users should be very concerned about what is happening instead of just trying to take fish from another user group. Restricting just the commercial fisher's isn't the answer to the problem. All users of the resource must be a party to the solution. The same goes for the hatchery programs that have for decades raised fish for all user groups in a responsible way with oversight from the State and ADF&G.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.



Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

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November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Cordova, Alaska, and I participate in the commercial salmon fisheries of the Prince William Sound Region. I've fished and lived in Cordova for over 30 years. Salmon fishing is the important industry for Cordova and is my livelihood.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders,



communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

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Submitted By  
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11/15/2021 10:46:08 PM  
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I support proposals 6,7,8,9,10,11,12,13,14,15,16,17,19,20,&41

I oppose proposals 18 ,21,& 22

The PU dipnet fishery in the upper CR has and is growing in popularity and efficiency. It is being turned into a commercial enterprise, and is threatening the long term health of the fish stocks, the board must take action to preserve the stocks for future generations.



Submitted By  
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11/15/2021 4:00:22 PM  
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Setnetter

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Dear Chair and Members of the Board,

My name is David Fleming, and I am a 3rd generation set gillnet salmon fishermen in Eshamy District, PWS. I have been a set gillnet permit holder the last ~15 years and deck-handed throughout my childhood for family members before that. I come from a fishing family and currently have 2 siblings and a father who are current permit holders and lifelong participants in the seine, setnet, and drift gillnet fisheries. I have participated (and continue to participate) in all 3 fisheries. I believe it is safe to say that my family has one of the longest tenures in the area out of current setnetters in that district today. At least one Fleming family member has been fishing PWS every single summer since 1963.

I am an active born & raised Alaskan who also participates in the sport and subsistence fisheries throughout other areas of our great state. Thank you for allowing me the opportunity to comment on the following proposals:

#### Proposal 42

**--OPPOSE--**

I staunchly oppose Proposal 42 as an, Alaskan, setnetter and person of reason. This is another attempt at destroying the historical setnet fishery of Eshamy district. This specific proposal has been attempted at the previous BOF cycle and was deemed completely wrong and out of line. There are 3 brief points I would like to bring up.

**1st)** I completely agree with everything PWSSA (PWS-Setnet Association) has commented regarding this proposal. The trigger point works and is following the framework established. ADFG comments that the trigger has been reached 3/5 last five years, but fail to mention 0/5 years before that. We only have 1 Eshsamy district to fish in. The drift fleet has 3-4 districts each year to choose from.

**2nd)** Everyone participating in this fishery knows that the trigger point is skewed heavily by the north and south lines. If it wasn't for these two areas I imagine the setnet fleet would never come close to that trigger point and this is well known amongst all. Ask anyone who fishes there.

**3rd)** The trigger point statistic is skewed and not even a correct statistic. There is an average drift participation rate of 27.6% for Eshamy District the past 5 years (2015-2020). (Meanwhile setnet efforts are more than double at over 55% averaged throughout the same time-period). Obviously, the catch rates are impacted exponentially if one user group is actively fishing more than the other. **\*SEE ATTACHED CFEC DATA\*** It is clear who is putting forth more of an effort in this district from that data alone. It means a lot more to us.

That being said, Proposal 42 is completely unnecessary and a clear attempt to put setnetters on the sideline more than they already are. We have fished countless years sitting at our camps while we watch the drift fleet go ahead in front of us due to the trigger point already established. We are only working 36 hours in a whole week. The hardest part to watch is the minimal effort put forth by the drift fleet when setnetters are limited in hours as well.

Setnetters typically have a minimum of 2-3 deckhands permit. How are we supposed to earn a living and pay our deckhands a decent wage when we are sitting on the sidelines watching the fish go by? My family, deckhands and I have spent nearly every summer out there and this proposal would unnecessarily restrict our fishing income. We already are singled out enough, and another year like this, would be devastating.

If the drift fleet want to increase their total catch they should increase their participation in actually fishing and quit trying to decrease the setnetters fishing time by setting unrealistic trigger points.

#### Proposal 43

**--SUPPORT--**

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#### Proposal 44

**--OPPOSE--**



PC060  
2 of 7

Proposal from the same individual author as proposal 42 solely trying to detriment the setnet user group. I agree with PWSSA has stated again. Not to reiterate my points from above, but there is just no effort being put forth from the d proposal.

Once again, Eshamy began as a setnet user group only district. By proposing to push our already limited hours to one 36 block opener per week would create another devastating blow to us. Who wants to wait 6 days each week for one opener? We are not allowed to fish other districts and are living out there waiting to fish.

I can honestly tell you that after July 10th the drift participation rate is more like 10-15% as well for every year I have been out there.

It is a joke of a rule to begin with. Lets eliminate the fundamental nature of fishing so that one user group can have 3-4 districts with minimal participation while another user group (that has historical ties to that area) are sidelined in the **only** area they are allowed to fish. By trying to limit the setnet user group to one 36-hour block per week is an abomination.

### **Proposal 45**

**--SUPPORT--**

This is an easy way to reduce gear conflict in THA area. It is unreasonable to assume someone can hold their drift gillnet within 1 fathom. There is current, winds, tides and other variables always in effect pushing and pulling nets.

### **Proposal 26**

**--OPPOSE--**

Subsistence permits are already available to all Alaska residents. Eshamy lagoon and other areas are already managed for optimal escapement and cannot be opened up to appease one group.

### **Proposal 27**

**--OPPOSE--**

Subsistence fishing 7 days a week would wreak havoc for management and enforcement. Numbers would be very hard to track and is not necessary. Especially when we are under chaotic enforcement in Eshamy due to sport/subsistence users being allowed to harvest when the hatchery is not making cost recovery. I believe there was an ACR attempt, but this is an issue that is of utmost importance. As a subsistence user, I believe there is already ample opportunity.

### **Proposal 46**

**--OPPOSE--**

Deep gear is already managed under emergency order by management.

### **Proposal 47**

**--OPPOSE--**

Management already can close districts in order to manage for runs destined to other districts.

### **Proposal 48**

**--OPPOSE--**

Management already can close districts in order to manage for runs destined to other districts.

**Proposal 49-53**

**--OPPOSE--**



PC060  
3 of 7

Author hiding individual name behind "gray" entity name and is attempting to reduce hatchery production on unreasonable science and data.

**Proposal 54-55**

**--OPPOSE--**

Author attempting to reduce hatchery production on unreasonable science and data.

**Proposal 56-57**

**--No Comment--**

**Proposal 58**

**--OPPOSE--**

**Proposal 59**

**--OPPOSE--**

**Proposal 60**

**--SUPPORT--**

ADFG use of coordinates more accurate as long as it does not alter/change historical setnet sites in Eshamy.

**Proposal 5**

**--No Comment--**

**Proposal 6**

**--Support--**

More accurate reporting.

**Proposal 7**

**--Support--**

You cannot be monetizing subsistence fishing through charter companies.

**Proposal 8**

**--Support--**



**Proposal 9**

**--Support--**

**Proposal 10**

**--Support--**

**Proposal 11-13**

**--Support--**

**Proposal 14-15**

**--Support--**

**Proposal 16**

**--Support--**

**Proposal 17**

**--Support--**

**Proposal 18**

**--Oppose--**

Unnecessary expansion of fishing grounds which are already managed by management.

**Proposal 19**

**--Support--**

Makes perfect sense that every contributes to lower catch on bad years.

**Proposal 20**

**--Support--**

**Proposal 21-25**

**--No comment--**

**Proposal 28**

**--Oppose--**

No one needs to subsistence fish 500 salmon

**Proposal 29**

**--Oppose--**



PC060  
5 of 7

**Proposal 30-37**

**--No comment--**

**Proposal 38**

**--Support--**

Makes perfect sense that every contributes to lower catch on bad years.

**Proposal 39**

**--Support--**

**Proposal 40**

**--No comment--**

**Proposal 41**

**--Support--**

**Proposal 61-67**

**--Support--**

**Proposal 68**

**--No Comment--**

**Proposal 69**

**--Support--**

**Proposal 70-73**

**--No comment--**

**Proposal 74**

**--Oppose--**

**Proposal 75-78**

**--No Comment--**



Proposal 79

--Support--

\*CFEC DATA GIVEN FROM DANIEL STRONG -RESEARCH ANALYST\*

Year Permit Type Statistical Area Pounds Landed Permits with Landings

2015S 03E	22510	1,257,215	224
2015S 03E	22520	1,263,642	220
2015S 03E	22521	996,258	188
2015S 03E	22527	177,610	56
2015S 03E	22528	766,385	134
2015S 03E	22529	180,625	48
2015S 03E	22530	1,159,457	184
2015S 04E	22510	228,849	11
2015S 04E	22520	419,778	24
2015S 04E	22521	224,435	23
2015S 04E	22527	43,240	14
2015S 04E	22528	207,431	17
2015S 04E	22529	54,370	19
2015S 04E	22530	444,329	20
2016S 03E	22510	513,020	186
2016S 03E	22520	603,969	170
2016S 03E	22521	467,424	153
2016S 03E	22527	426,854	98
2016S 03E	22528	232,749	85
2016S 03E	22529	250,489	63
2016S 03E	22530	641,400	150
2016S 04E	22510	140,450	7
2016S 04E	22520	406,467	24
2016S 04E	22521	128,348	22
2016S 04E	22527	confidential	15
2016S 04E	22528	78,580	14
2016S 04E	22529	162,207	21
2016S 04E	22530	306,451	14
2017S 03E	22510	1,049,813	226
2017S 03E	22520	878,281	222
2017S 03E	22521	704,020	215
2017S 03E	22527	355,869	115
2017S 03E	22528	141,638	96
2017S 03E	22529	580,197	85
2017S 03E	22530	817,237	143
2017S 04E	22510	96,826	9
2017S 04E	22520	364,495	24
2017S 04E	22521	confidential	21
2017S 04E	22527	114,265	18
2017S 04E	22528	confidential	18
2017S 04E	22529	confidential	20
2017S 04E	22530	252,700	13
2018S 03E	22510	1,211,466	211
2018S 03E	22520	1,011,971	262
2018S 03E	22521	661,398	219
2018S 03E	22527	336,404	92
2018S 03E	22528	129,316	70
2018S 03E	22529	544,439	112
2018S 03E	22530	2,102,096	214
2018S 04E	22510	confidential	7
2018S 04E	22520	251,204	19
2018S 04E	22521	114,221	18
2018S 04E	22527	confidential	9



2018S 04E	22528	confidential	7
2018S 04E	22529	confidential	19
2018S 04E	22530		314,151 11
2019S 03E	22510		1,219,218 228
2019S 03E	22520		610,057 171
2019S 03E	22521		867,213 187
2019S 03E	22527		109,685 47
2019S 03E	22528		15,639 15
2019S 03E	22529		167,540 59
2019S 03E	22530		1,154,919 196
2019S 04E	22510		253,875 13
2019S 04E	22520		244,681 19
2019S 04E	22521		343,947 20
2019S 04E	22527	confidential	9
2019S 04E	22528	confidential	10
2019S 04E	22529	confidential	15
2019S 04E	22530		612,718 18
2020S 03E	22510		1,018,196 256
2020S 03E	22520		681,736 293
2020S 03E	22521		277,668 179
2020S 03E	22527		64,412 36
2020S 03E	22528	confidential	29
2020S 03E	22529		61,378 38
2020S 03E	22530		1,279,332 252
2020S 04E	22510		101,675 15
2020S 04E	22520	confidential	18
2020S 04E	22521		55,565 14
2020S 04E	22527	confidential	7
2020S 04E	22528	confidential	6
2020S 04E	22529	confidential	16
2020S 04E	22530		212,655 14



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Clam Gulch and commercial fish in Cook Inlet. Processors located in Cook Inlet rely heavily on processing salmon caught in Prince William Sound to make their facilities viable especially in these times of severe Cook Inlet commercial fishing restrictions and disastrously low harvest. I have consistently supported the aquaculture program and the science for abundance based management. The salmon produced from the aquaculture programs benefits all Alaskans in some manner. The State has scientific and genetic data plus the public RPT process to set hatchery egg take numbers. This is where the number should be set, not at the Board of Fishery meeting from a proposal which is based on non-scientific political whims, rather than scientific data.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

David Martin

[Dmartin4091@gmail.com](mailto:Dmartin4091@gmail.com)

(907) 252-2752

Submitted By  
David R Otten  
Submitted On  
11/9/2021 8:51:31 AM  
Affiliation



PC062  
1 of 1

I would like to Oppose Proposals 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, and 20

And Support Proposals 18, 20, 21, and 22



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Whittier and Cordova. I own and operate the oldest tour business in the Prince William Sound region. I always show my guests how salmon are harvested, when the opportunity arises and explain how this is the only well managed and sustainable fishery in the world. I'm a long time participant in the economic opportunities here in the Sound. I'm here for the long haul and although I do not engage in commercial fishing any longer, I consider the hatchery enhanced salmon fishery in the PWS region to be the biggest economic engine in the entire PWS area. My guests on our tours absolutely LOVE seeing the salmon fishery in action.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

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The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Dean Rand  
[Dean.rand@gmail.com](mailto:Dean.rand@gmail.com)  
(907) 529-1123



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I participate in commercial salmon fisheries in the Prince William Sound region. My employment is with a Seafood Processor, I am based out of their corporate office. Salmon fishing is extremely important to me. The industry provides my sole source of income as well as the income for other family members both in Washington and Alaska.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

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Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Debbie Satterlee  
[debbie.satterlee@obiseafoods.com](mailto:debbie.satterlee@obiseafoods.com)  
(206) 286-5664





November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I am a tender for Trident Seafoods. Hatchery production is important to the needs of Trident Seafoods in hiring vessels such as mine.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Dennis Deaver  
[dennisdeaver@msn.com](mailto:dennisdeaver@msn.com)  
(510) 502-7825

Submitted By  
Dennis M Zadra  
Submitted On  
11/14/2021 5:47:56 PM  
Affiliation  
Commercial Fisherman



PC067  
1 of 1

Dear Board of Fish Members,

I have been gillnetting salmon on the Copper River for 30 years and have seen it's ups and downs, but we have been in a steady decline over the last 5 years that is unprecedented. The commercial fleet has continually lost time and area to the point that we fished only 36 hours total on the entire early Copper River run this year, followed by a 15-day closure, although the run was 200,000 fish above the management objective at the time the counter was pulled. The result is a reallocation of the fish from the commercial fleet to the PU and Subsistence users upriver. This has resulted in a growing charter business that is getting paid to give more Alaskans access to this fully allocated resource. The relatively new practice of dipping from a moving boat (trawling) increases their efficiency resulting in full limits for their paying clients. I have seen pictures on Facebook with more fish in their boat from 1 trip than I caught my entire season. The conservation of the resource should not rest solely on the commercial fleet. Additionally, the commercial fleet is required to report their catch within 24 hours which is accomplished with fish tickets. The PU and Subsistence fisheries are only required to self-report their catch well after the close of the season. We need real time reporting so upriver managers can know how many fish are being caught and adjust accordingly. There is no question that gillnet web in dipnets increases fish mortality. This along with trawling from boats is not Customary and Traditional. Commercial fishing is the economy of Cordova. Without it, we would not survive. A healthy Copper River and a successful hatchery program are vital to this community. Thank you for listening to my concerns.

SUPPORT: Props 1,6,7,8,9,10,14,15,16,17,19,20,26,30,32,33,36,38,39,40,41,59,61,62,63,64,65,66,67,68 (Option E), 69,70,71,72,79

OPPOSE: Props 5,18,21,27,31,49,50,51,52,53,54,55



Submitted By  
diana riedel  
Submitted On  
11/15/2021 4:53:03 PM  
Affiliation

Phone  
9072535364  
Email  
[dianariedel@hotmail.com](mailto:dianariedel@hotmail.com)  
Address  
po box 6  
cordova, Alaska 99574

Formal On-Time Public Comment to the Alaska Board of Fisheries

Prince William Sound Finfish 2021/2022

PROPOSAL 5: OPPOSE

PROPOSAL 6: SUPPORT I support timely reporting for all users of Copper River Salmon. PROPOSAL 8: SUPPORT I support the prohibition of dipnet harvest at river confluences in the Upper Copper River.

PROPOSALS 9-11: SUPPORT I support restrictions on dipnet harvest from boats in the Upper Copper River.

PROPOSAL 14-15: SUPPORT I support the restricting the use of monofilament gillnet webbing in dipnets until after August 15.

PROPOSAL 16: SUPPORT I support the prohibition of the use of sonar to target fish holding in the Copper River while dipnetting.

PROPOSAL 18: OPPOSE

PROPOSAL 19: SUPPORT I do not currently see the burden of conservation shared equitably among user groups when sockeye salmon are not abundant. This proposal would correct that. PROPOSAL 20: SUPPORT We encourage parity in subsistence harvest limits across the Copper River's fisheries.

PROPOSAL 21: OPPOSE

PROPOSAL 38: SUPPORT We support this proposed shared conservation burden.

PROPOSAL 40: SUPPORT I support the prioritization of spawning area over sport fishing area and encourage the Board of Fish to broadly close salmon spawning areas to salmon harvest. Coho salmon have been documented to spawn broadly in the 18-Mile (Silver Creek) area and historically in the vicinity of the Copper River Highway.

PROPOSAL 41: SUPPORT I support allowing managers to provide fishing area adequate to conserve chinook salmon.

PROPOSALS 61-67: SUPPORT I support the addition of sustainable winter and shoulder season fisheries opportunities such as sea cucumber and crab.

Submitted By  
Douglas Frey  
Submitted On  
11/7/2021 7:47:59 PM  
Affiliation



PC069  
1 of 1

Proposal 6 – Oppose

Proposal 7 – Strongly Oppose

Proposal 8 – Oppose

Proposal 9 – Oppose

Proposal 10 – Strongly Oppose

Proposal 11 – Strongly Oppose

Proposal 12 – Strongly Oppose

Proposal 13 – Strongly Oppose

Proposal 14 – Strongly Oppose

Proposal 15 – Strongly Oppose

Proposal 16 – Strongly Oppose

Proposal 17 – Strongly Oppose

Proposal 19 – Strongly Oppose

Proposal 20 – Strongly Oppose

SUPPORT

Proposal 18 – Strongly Support

Proposal 21 – Support

Proposal 22 – Support



**Douglas Island Pink and Chum, Inc.**

2697 Channel Drive ◦ Juneau, Alaska 99801  
(907) 463-5114 ◦ [www.dipac.net](http://www.dipac.net)

Alaska Dept. of Fish and Game  
Alaska Board of Fisheries  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
Submitted via Email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

November 10, 2021

**RE: DIPAC Opposes Board of Fisheries Proposals 49, 50, 51, 52, 53, 54, and 55.**

Members of the Alaska Board of Fisheries,

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit hatchery corporation based out of Juneau, Alaska. The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.

**DIPAC opposes proposals 49, 50, 51, 52, 53, 54 and 55.**

Alaska's hatcheries have operated with substantial Department of Fish and Game oversight and public participation for over 40 years. Hatchery production has been stable for over 30 years, and there is no need to interrupt these successful programs. The hatchery operators have been working closely with ADF&G, members of the public, and the greater Scientific community to better understand the impacts of these enhancement programs for the entirety of the programs' existence. ADF&G already takes into account many of the concerns raised by all of these proposals, and the Department takes great care in how PNP's hatcheries are permitted to make sure significant negative impacts by hatchery raised salmon on wild stocks do not occur. If any of these proposals were to pass, it could lead to significant negative impacts on fishing opportunity for all user groups, communities, and stakeholders where hatchery raised salmon are harvested.

Respectfully,

Katie Harms  
Executive Director - DIPAC



**From:** [Dustin Cline](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Prince William sound gear proposal  
**Date:** Thursday, October 15, 2020 9:41:00 AM

---

Meeting: Working Meeting on 10/15/20

Name: Dustin Cline

Fishery: Seine permit and fishery participant for 8 seasons. 3rd generation seiner.

Email: [Dustin.cline1@gmail.com](mailto:Dustin.cline1@gmail.com)

**Re: Proposal 56**

Though I believe gear stacking is a good solution for addressing the excess fishing capacity within the Prince William Sound (PWS), I do not believe this proposal is the right solution.

Adding 25 fathoms of gear for a stacked permit is a simple and moderate proposal that I believe most PWS permit holders support. However, the gear depth increase is not supported by most fisherman nor myself.

This proposal makes the stacked second permit too much of an advantage over a single permit.

**Proposal 57**

This gear stacking proposal strikes the right chord between cost and benefit. 25 fathoms of extra gear is an advantage, however, not too much of an advantage. We do not want to create a dichotomy where in order to be competitive you *must* have a second permit. 25 fathoms of extra length is a modest proposal that helps to address the problems of excess fishing capacity in the Sound by soaking up excess fishing capacity while also not being too much of an advantage to make it necessary to compete.

Thank you  
Dustin Cline

Sent from my iPhone



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Valdez and commercial fish. I am a 3<sup>rd</sup> generation fisherman and rely on fishing as a way of life. My family and the community of Valdez also rely on fishing.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region,



especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Dustin Cline  
[Dustin.cline1@gmail.com](mailto:Dustin.cline1@gmail.com)  
(907) 229-7856

**Eastern Interior Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503-6199

Phone: (907) 786-3888, Fax: (907) 786-3989

Toll Free: 1-800-478-1456



PC072  
1 of 2

RAC/EI 21043.VM

November 12, 2021

Ms. Marit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
1255 West 8<sup>th</sup> Street  
Juneau, Alaska 99811-5526

Re: Support for Proposals 54 – 55 for the Prince William Sound/Upper Copper and Upper Susitna Rivers  
Finfish and Shellfish November 2021 Cordova Meeting

Dear Chair Carlson-Van Dort:

The Eastern Interior Alaska Subsistence Regional Advisory Council (Council) during its teleconferenced public meeting on October 14 – 15, 2021 reviewed and commented on the 2020/2021 Alaska Board of Fisheries Proposals 54 – 55 (Prince William Sound Finfish, Commercial Fishing, Enhancements). The Council unanimously supported Proposals 54 – 55.

The Council is one of ten Federal Subsistence Regional Advisory Councils that were formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) to represent subsistence users in their regions. The Regional Advisory Councils provide a public forum for discussion and recommendations on any matter related to subsistence uses of fish and wildlife. Section 805 of ANILCA established the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region and migrate from other regions. The Council provides a public forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region and associated drainages.

The Council supports Proposals 54-55 because over the years it became increasingly concerned that wild Yukon River salmon stocks are negatively impacted by increasing food competition in the North Pacific Ocean from the over production of Chum and Pink salmon hatchery fish. Since 1995, annual hatchery releases have ranged from about 1.4 to 1.8 billion juvenile salmon. About 1.7 billion juvenile salmon were released in 2020. Pacific Rim nations also add hatchery salmon to the same ocean environment, further increasing competition for food for Alaska's wild salmon. For over 30 years, the Yukon River has seen a steady decline of Chinook Salmon in both size and run strength. The Council has for multiple years expressed concerns about the declining Chinook Salmon returns, reduction in their size, and loss of fish age classes. During these Chinook Salmon declines there have been periodic crashes of summer and fall Chum Salmon in the Yukon River. The subsistence salmon needs for the Eastern Interior Region have not been met for a long time.

A similar decline in size and run strength has been noted for summer Chum Salmon. The survival of older age class (age-5) this year suggests poor survival during their lifecycle. As noted in the 2021 Yukon River Summer Season Summary (ADF&G October 26, 2021) "Other regions of the state also experienced a



Ms. Marit Carlson-Van Dort, Chair

below average return of age-4 and age-5 chum” indicating poor survival rates for these age classes. All Arctic-Yukon-Kuskokwim (AYK) salmon have had their size decline since 2010 in comparison to 1990 sizes. In recent studies note several factors such as climate changes and increased competition with highly abundant hatchery salmon in the seas could result in reduced body size for AYK salmon.

The 2021 subsistence fishing season was completely closed to any harvest of Chinook and chum salmon. Harvest of Yukon River salmon is central to the subsistence needs of villages across the drainage. The persistent and disastrous declines of Chinook and chum salmon have resulted in elevated food security concerns for this winter and beyond with projections of continuing poor salmon returns. There are 54 Alaskan Yukon River villages, and their residents are impacted by the decline in returning salmon. This impact also affects ten Canadian First Nations in the Yukon Territory and Province of British Columbia. Central to the identity of rural and Native Alaskans of Interior is providing for themselves, their families, and communities. Fishing is also critical to the survival of their Native cultures. Fish camps, where traditional knowledge is shared and families reunite, have been boarded up for years. These are challenging times with rapidly changing climate and COVID-19 pandemic.

Years of critical conservation measures are needed to ensure the future survival of these salmon stocks and to rebuild the once abundant salmon returns. Decreasing the allowable hatchery production for chum and pink salmon is one of such critical conservation measures that calls for an immediate action by the Alaska Board of Fisheries during its upcoming meeting on November 30 – December 6, 2021. It is a time for all to pull together and understand the full lifecycle and migration of Chinook, chum, and coho salmon and how annual hatchery releases affect these. Adopting proposals 54 & 55 requesting the reduction in hatchery production are immediate steps to provide for future subsistence and cultural needs across the Yukon River drainage and to meet escapement goals and Canadian treaty obligations for years to come.

Thank you for the opportunity for the Council to voice its concerns over this very important issue affecting subsistence users in the Eastern Interior Alaska Region. Any questions regarding this letter can be addressed through the Council Coordination Division Supervisor Katerina Wessels at 907-786-3885 or katerina\_wessels@fws.gov.

Sincerely,

Susan L. Entsminger, Chair

cc: Federal Subsistence Board  
Assistant Regional Director, Office of Subsistence Management  
Deputy Assistant Regional Director, Office of Subsistence Management  
Subsistence Policy Coordinator, Office of Subsistence Management  
Supervisory Program Analyst, Office of Subsistence Management  
Fisheries Division Supervisor, Office of Subsistence Management  
Anthropology Division Supervisor, Office of Subsistence Management  
Subsistence Council Coordinator, Office of Subsistence Management  
Alaska Department of Fish and Game, Commercial Fisheries Division  
Eastern Interior Alaska Subsistence Regional Advisory Council  
Interagency Staff Committee  
Administrative Record



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

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I live in Cordova, Alaska, and I participate in the commercial salmon fisheries of the Prince William Sound Region. Salmon fishing in the Prince William Sound region is very important to me and my livelihood.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

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If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Edgar Tabilas  
etabilas1967@gmail.com  
(907) 830-7555



Submitted By  
Edmund Howell  
Submitted On  
1/9/2021 10:02:18 AM  
Affiliation

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8014507783  
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[howellek@gmail.com](mailto:howellek@gmail.com)  
Address  
10185 N 6580 W  
Highland, Utah 84003

Comments on Prince William Sound Proposals 38,39 and 40

I have been sportfishing in Alaska for many years. My family and I look forward all year to the week we are able to spend in Alaska. The fishing quality has no equal anywhere in the United States. We particularly like fishing in the Cordova area due to the access and overall quality of the fishing experience. A week long trip to Cordova is costly and has to be planned well in advance, and without prior knowledge of commercial fishing "openers" or newly adopted regulations. The adoption of additional restrictions has the potential of reducing the fishing opportunities and quality of our Cordova fishing experience.

We recognize the importance of conservation of limited resources and the importance of sport fishermen working together with the commercial fishing industry. Decisions must be made by the Board for the overall benefit of the resource and sometimes as a compromise between competing interests.

In recent years we have experienced and recognized the impact that commercial regulations can have on sport fishing. When multiple day commercial openers have occurred during the Coho spawning runs, it has essentially shut down the fishing on the Eyak River, Alaganik Slough, and Ibeck Creek for much of the week that we have scheduled for our trip. The commercial fishermen are so skilled and so efficient that very few fish are able to enter the river system. Not only does this affect sport fishing on the days when the commercial fishing is open, but it also affects a day or two after commercial fishing closes while the fish repopulate the river system. Our much anticipated week long fishing trip and catch opportunities are greatly compromised. In order to salvage the trip, our only option is to seek places to fish that are further from the migration corridors and closer to the spawning beds or locations.

Proposals 39 and 40 compromise our ability to find places to fish when the commercial fishermen are blocking the river mouth to migrating fish or when extended rain events have caused the Eyak River and Ibeck Creek to rise and become clouded. Before adopting these proposals it would be interesting to see if a study could determine the actual number of fish taken North of the Copper River Highway Bridge above the 1/4 mile mark and also in the Mile 18 or Silver Creek area. Is the impact significant enough to warrant additional restrictions or regulations?

I would also like to comment on Proposal 38. It is not clear to me the ratio of commercially caught Cohos compared to sport caught fish in the Cordova Area. While both competing interests need to share in the conservation of the species and in the harvest opportunities, are the sport fishermen taking enough fish from the population, compared to the commercial industry, that it warrants the additional regulations detailed in Proposal 38?

Please reconsider Proposals 38, 39 and 40 as well as the continuance of frequent multiple day commercial fishing openers. Are the sport fishing statistics or facts conclusive enough to enact these additional restrictions or are they an attempt by the well organized commercial fishing association to greatly compromise the fishing opportunities and experiences of the sport fishermen. The effect that these proposed regulations could have on the quality of the sport fishing experience in the Cordova Area is significant.

Thank you for your careful consideration of all of the proposed regulations and especially the research and evaluation of proposals 38, 39 and 40.

Sincerely, Edmund Howell



Submitted By  
Eli Johnson  
Submitted On  
11/13/2021 9:53:37 PM  
Affiliation

Phone  
907-429-8089  
Email  
[eli@graphicice.com](mailto:eli@graphicice.com)  
Address  
PO Box 1089  
Cordova, Alaska 99574

Vote **NO** on proposal **49** on the basis that changing the salmon allocation plan without more discussion and vetting by all parties will create undue hardship for the Board of Fish. A lot of work went into creating this plan as is. If it changes it should be with a lot of thought about the consequences.

Vote **NO** on proposals **50, 51, 52 & 53** on the basis that the research study on PWS salmon straying is not yet final. The data and results need to be examined and discussed openly before any rash or political decisions are made.

Vote **NO** on proposal **54 & 55** on the basis that data does not show that chum salmon production in PWS has a negative impact on competition for food. We all want healthy runs and enough salmon for Alaska residents. That the current runs will lead to a collapsing economy or eroding of culture is conjecture.

Vote **NO** on proposal **56 & 57** on the basis that permit stacking to allow larger seines creates different classes of permit holders. A decrease in seine permits (which this proposal is attempting) is needed for various reasons, but this isn't the way to go about it.



Submitted By  
Eli Powell  
Submitted On  
11/15/2021 5:53:37 PM  
Affiliation

Phone  
9079470730

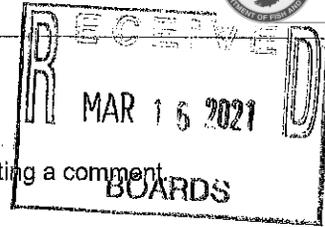
Email  
[etpowell@gci.net](mailto:etpowell@gci.net)

Address  
2650 MARSTON DRIVE  
Anchorage, Alaska 99517

My name is Eli Powell and I have been dipnetting at the Copper River since 2008. I am a retired veteran after serving in the Air Force for over 24 years and my family and I rely on this fishery for our supply of salmon for the last 13 years. I personally have dipnetted with older Alaskans and female members of my family who are unable to dipnet from the shore due to their physical limitations. I strongly oppose the proposal restricting boat participation in the Glennallen subdistrict dipnetting fishery at the Copper River upstream from the bridge in Chitina. Specifically proposals 9 through 15, and 17. These proposals preferentially restrict the fishery user rights of one group over another. There are other options to better address this issue such as limit reductions. Thank you for your time and consideration of my comments.



# Alaska Department of Fish and Game



[ADF&G Home](#) » [Regulations](#) » [Process](#)

## Submit Written Comments

Please read the information on the "Comment Requirements / Instructions" tab before submitting a comment.

[Comment Form](#)   [About Submitting Comments](#)

\* Indicates a required field

Board Meeting    Select a meeting (Meeting Title - Comment Deadline) *Prince William Sound*

Name \*    *Ellie Korth*    Affiliation

Contact Phone \*    *(907) 822-4144*    Email \*    *derelee.01@hotmail.com*

Address Line 1 \*    *P.O. Box 133*

Address Line 2

City \*    *Glennallen*

State \*    *- Alaska*    Zip \*    *99588*

Do you consent to your contact information being included on printed copies of your comment? \*

Yes  No

Comment \*

*Proposal for Mouse Creek, Copper River Basin*

Format

*Mouse Creek: Sport Anglers may use baited or unbaited single hook artificial lures. Bag limit is 2 and 2 in possession. Season is open year around, only catch and release fishing is allowed from April 1 to May 31.*

body p    Words: 0 (Limit: 5000)

**Click submit once.** The process may take several moments. You will receive an email confirmation. Difficulties? Contact 465-4110 for Boards Support staff, or click the "About Submitting Comments" tab above for other ways to submit.

Thank you!



Submitted By  
Emma Owecke  
Submitted On  
11/2/2021 1:56:28 PM  
Affiliation

Phone  
6083864119  
Email  
[emmaowki@gmail.com](mailto:emmaowki@gmail.com)  
Address  
55195 Eva Ct  
Homer, Alaska 99603

Märit Carlson-Van Dort and Members of the Board,

My name is Emma Owecke and I grew up setnetting with my family in Prince William Sound. I have been a permit holder for 8 seasons, and a deckhand for 4 years prior. Setnetting is central to my life. I live in Homer, Alaska.

### **Proposal 42 - oppose**

Please **oppose** proposal 42 as it would create a situation where the setnet fleet is always out of allocation. This is not what the allocation plan was made to do. As it stands now, our allocation is strongly swung one way or the other based upon what the seine fleet catches. Often, when the seiners have low harvest, it shows in the numbers that setnetters are over their allocation. This is not necessarily indicative of how successful or unsuccessful the setnet fleet has been, but is rather only the inverse of the seine fleet. This proposal is an unrealistic way to manage setnet catch, as our allocation is subject to the highs and lows of seine and drift catch.

On the flip side, the setnet harvest has minimal effect on harvest percentages for the drift and seine fleet.

If Proposal 42 went into effect, it would cause the setnet fleet to be out of allocation more often than not, with extreme consequences of reduced fishing time to 36 hours per week every season. This is not a realistic way to make a living. Setnetters are already limited to fishing only in the Eshamy District. Proposal 42 would constantly put us over allocation, meaning we would be subjected to limited fishing in an already limited district. This is drastic in comparison to the drift and seine user groups who are able to fish in multiple districts. Seiners and drifters still have the ability to fish and make a living when they are over their allocation, as they can move between districts and often fish regularly.

Additionally, in the allocation plan under 5 AAC 24.370, the seine and drift gear groups are rewarded for being under allocation, and penalized for being over allocation. The setnet gear group is only penalized when they are over allocation, and never rewarded for being under allocation. This is already an imbalance in the allocation plan. Please do not approve proposal 42, as it would have a lasting negative effect on the livelihoods of the setnet gear group.

### **Proposal 43 - approve**

Please **approve** proposal 43. All enhanced salmon should be accounted for in the enhanced salmon allocation plan in Area E. This is only sensible. Currently, VFDA fish are not accounted for in the allocation plan, ultimately providing the seine user group with a huge advantage over other user groups in Area E. Having an allocation plan that doesn't account for all enhanced salmon in Prince William Sound is illogical and disproportionate.

### **Proposal 44 - oppose**

Please **oppose** proposal 44 as it would have severe and lasting effects on the setnet fleet.

Limiting the setnet fleet to one 36 hour fishing period per week is a proposal that would have more negative effects than intended or expected. Fishing once a week with no alternative fishery resources is not a viable way to make a living as a fisherman. The setnet gear group is confined to fishing only in the Eshamy district. If we are regulated to fishing one short opener per week in one district, there will be many years where it is unrealistic to make a living.

The author of this proposal states that current regulations are ineffective in reducing the allocation percentage in the setnet fleet. This is not true. Currently, our allocation percentages show that on-going measures are adequate in bringing us back within our percentage of harvest. If this proposal is approved, it would be far more severe than intended in cutting back the setnet fleet.



Additionally, as mentioned in opposition to Proposal 42, the setnet catch is such a small percentage of the common setnet harvest percentage is swung high or low based upon what kind of seasons the other two gear groups had. For the fleet had an exceptional year, the setnet catch percentage appears low. If the seine fleet had a catastrophic year, the percentage appears high, thus putting us over our allocation percentage in years when one of the other user groups had a bad year. The setnet fleet being over allocation is often not indicative of how successful or unsuccessful the setnet fleet has been, but more a product of how the drift and seine seasons were. The same cannot be said for the drift and seine user groups, as their harvests are a much greater percentage of the common property fish, and are not swung high or low based upon setnet catch.

Another point in opposition to proposal 44, is that the Eshamy district has historically been a setnet fishery prior to drift gillnetting in the Eshamy district. This proposal would make the only setnet fishery in the Sound become more favorable to drift gillnet fishing, despite the fact that they already have numerous districts to move between during their fishing season.

Please oppose Proposal 44, as it would have severe negative effects on the setnetters in Prince William Sound, and would create a setnet fishery that is no longer a viable way to make a living.

#### **Proposal 45 - approve**

Please **approve** proposal 45 as it would provide a safe and enforceable fishery in the Main Bay Subdistrict Terminal Harvest Area (THA). With current regulations, setnetters fish 50 fathoms apart, and drifters are able to fish within 25 fathoms of a set net. The issue that has surfaced, is that many drifters fish between two set nets that are placed exactly 50 fathoms apart. It is impossible for a drift net to maintain an exact line between two set nets placed 50 fathoms apart. Drift nets move with the current, and cannot in any way stay legal when set between two set nets spaced 50 fathoms apart. This has created a scenario during build up openers that is chaotic and unenforceable. Such a great number of drifters do it simultaneously, that it results in widespread illegal fishing which is unable to be enforced by the Alaska State Wildlife Troopers. Approving proposal 45 would result in a more orderly and enforceable fishery in the Main Bay THA.

#### **Proposal 46 - oppose**

Please **oppose** proposal 46 as the use of deep gear is something that can be implemented anytime under emergency order. If deep gear is needed, it can be determined by management and then implemented. Additionally, the constant use of deep gear would cause greater interception of fish moving to other districts.

#### **Proposal 47 & 48 - oppose**

Please **oppose** proposal 47 and 48. This proposal is unneeded as management is already able to close districts as necessary if too many fish are being caught that are bound for other districts.

#### **Proposal 58 - oppose**

Please **oppose** proposal 58. This is an irresponsible proposal in terms of fishery management, as it results in delay of information and the potential for both over-harvest and greater interception of fish returning to other areas where they are bound. Allowing seiners to fish every day of the week in AFK would leave no time for other stocks of fish to move through and reach their place of origin. This proposal has a great chance of creating biological problems. Most salmon returning to Prince William Sound use the southwest district as their corridor. AFK is the first fishing area within the Southwest District, meaning the majority of fish that are bound for other areas pass through these waters. Allowing seining to occur every day of the week in the main corridor and first district which the majority of all Prince William Sound salmon pass through is utterly irresponsible.

Thank you for your time,

Emma Owecke



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Ketchikan, Alaska, and I participate in the commercial salmon fisheries of the Prince William Sound region. I was raised on a gillnetter in Southeast Alaska. Learned about the sustainable harvest of salmon through fish and game management, and found great value in hatchery enhanced fisheries. The economic impact is positive and spreads throughout small communities where hatchery runs thrive. I am currently serving my first term on the SARAA Board of Directors. I have benefited, now I wish to share with others the positive impact the hatchery programs have on the regions they serve.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

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If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Eric Bezenek  
ebezenek@gmail.com

Submitted By  
Eric F Fleming  
Submitted On  
11/15/2021 11:52:07 PM  
Affiliation



PC080  
1 of 1

I disagree with proposal 42 and 44 and here are the reasons why:

To begin with, you must know what it is to be a commercial fisherman in each of the PWS commercial salmon fishing groups before making changes in allocation plan redistributions. I have many years of experience and knowledge in all three PWS commercial salmon fisheries. I'm a born and raised Alaskan fisherman who has fished all three fisheries out of PWS for over 25 years.

I have seen all three commercial fishing groups evolve over the years and I'm very familiar with the challenges each gear group faces along with the benefits, constraints, and pitfalls of each group. You have to know each of these gear groups well, how they operate, the margins they deal with, as well as the tangible and intangible costs each juggle, before you can make any sort of allocation decisions. It is apparent the author of this proposal is not versed very well in all of these gear groups.

To begin with, you must understand the author is suggesting lessening the hourly work week of the set gillnetters to less than 36 hours a week. Reasonable logic, along with the suggestions from any respectable fisherman would tell you that is not a reasonable amount of time to create a sufficient or sustainable income for any fishing operation.

Secondly, it's not possible to create new trigger points or allocation changes, between gear groups without taking into account the "effort ratios" (user ratio of a single gear group) from each group. Having more people present, or putting forth more effort to sustain their incomes does not mean they should be punished for their presence, or efforts. By following Alaska's culture and history of creating sustainable, fair, free and open market policies, you must take into account all of these ratios before making any distribution decisions.

Another measure that should be accounted for, before making allocation changes, is the representation of each gear group. When looking at the actual permits per gear group, the set gillnetters holding 30 permits are significantly underrepresented. Drift gillnetters, at 520 take the bulk of representation, followed by that of seiners at 220 permit holders. To make up for this unequal number of representation efforts within each gear group, you would need to take into account the total ratio of response rates for each gear group. In other words, the "fishing interest" from one gear group to another. This factor would then be weighted into the allocation process giving the underrepresented gear groups a ratio, or a "voice", in the allocation process.

In summary, PWS salmon gear group allocation plans have historically not been accommodating to the set gillnetters, and rather a means to redistribute wealth to satisfy the drift gillnetters. This redistribution ultimately lessens their allocation quandary with the seiners (which is apparent with proposal 43). This trigger point proposal is by no means fair or reasonable. Expecting a gear group to make a living with under 36 hours in a work week. Also, trigger points can't be fully accounted for without taking the "effort" ratios or "representation" pulls into account. If these ratios are not accounted for, the trigger points and their allocation percentages are being used as political motive to redistribute wealth from one gear group to another. More importantly, set gillnetting has historically been performed in one fishing district, before the arrival of drift gillnetters, and therefore should be given weight to their only fishing opportunity. I strongly oppose proposition 42 and 44 and ask that you uphold the current exvessel value percentage trigger points as they stand.



November 12, 2021

To Whom It May Concern:

My name is Eric Lian, of Cordova, AK 99574; a longtime commercial fisherman of PWS / CR as a salmon drift gillnetter and salmon purse seiner. Please find below my position and comments on the following proposals.

Proposal 5: I oppose. I urge the Board to reject the proposal and allow for ADF&G to manage the Copper River king salmon return through science and not re-allocation through politics which the KRSA aims to do.

Proposal 6: I support. The Board should pass this proposal. Timely, consistent, and accurate reporting should be required by all user groups.

Proposal 7: I support. The Board should pass this proposal to eliminate the unintended commercialization of subsistence fisheries. If the Board finds this proposal unreasonable, then I suggest they consider amending the proposal to require charter guide services / transport vessel operators for hire to obtain a limited entry commercial fishing permit (e.g. Upper Copper River transport operators become required to carry a PWS S03E drift permit while engaged in charter guide services / transport operations for hire).

Proposal 8: I support. The Board should pass this proposal if ADF&G finds that the dip netting in the Upper Copper River is creating stocks of concern.

Proposal 9, 10, 11, 12, and 13: I support: The Board should pass these proposals and prohibit or restrict dip netting from a boat.

Proposal 14 & 15: I support. The Board should pass these proposals, because the use of a dip net should be similar to the type that is commonly used while sport fishing. A common dip net used in sport fishing by design provide a low chance for a fish becoming gilled in the dip net and allows for an easier return for catch and release of a fish. In addition, dip nets that are fixed with a net greater than 6 feet in stretched depth from the hoop that it's secured to and to the bottom of the dip net should be required to have a pucker strap and quick release to allow for the bottom of the net to be opened freely by the operator. Doing so will minimize the time with the process of catch and release of a fish when the retention of a certain fish is prohibited.

Proposal 16: I oppose. I urge the Board to reject the proposal and consider unintended navigational safety concerns for vessel operators; every vessel should be able to be equipped with the most up-to-date electronic equipment if it reduces operator risk and improves safety.

Proposal 17: I support. The Board should pass this proposal if ADF&G finds merit in the author's argument.



Proposal 18: I oppose. I urge the Board to reject this proposal and consider the call to action as cited in proposals 9 through 13, which is to restrict dip netting from a boat.

Proposal 19 & 20: I support. The Board should pass these proposals, because sharing in the burden of conservation among non-subsistence user groups is tantamount.

Proposal 21: I oppose. I urge the Board to reject this proposal, and rather consider not opening the Chitina Subdistrict personal use fishery until there has been a minimum of 5 (five) commercial fishing opener opportunities for PWS S03E drift gillnet fishing with a minimum of 12 hours of opportunity for each within the Copper River District on an annual basis.

Proposal 22: I oppose. I urge the Board to reject this proposal, and consider keeping the Chitina Subdistrict closed until ADF&G has formulated an Upper Copper River Personal Use management plan that can be effectively implemented to account for the growing population of the State of Alaska. All Alaska residents have ample opportunity to Personal Use and Subsistence fish throughout the State of Alaska.

Proposal 41: I support. The Board should pass this proposal to allow for ADF&G to manage the Copper River District around science and not restrictive politics.

Proposal 43: I support. The Board should pass this proposal, and consider having any future allocation plan modifications to include Federal and/or State (I.E. USDA Seafood Trade Relief Program and Alaska CARES Act) funds that are based off of common property catch records among its user groups.

Proposal 45: I support the intent, but oppose the suggested distance. Rather than an operational distance of 30 fathoms between set and drift gillnets in the Main Bay Subdistrict; the Board should pass this proposal with the amendment to increase the operation distance between set and drift gillnet gear by expanding the Eshamy District AGZ boundary to include all of the Main Bay Subdistrict, while keeping all existing rules of the Eshamy District AGZ in place. Increasing the operation distance by expanding the Eshamy District AGZ boundary to include all of the Main Bay Subdistrict will eliminate gear conflict within this subdistrict and allow for a more equitable opportunity among drift and set gillnet users. Also, this should create a benefit to the AWT Division by reducing the need to monitor for gear conflict if the drift and set gillnet users fished the Main Bay Subdistrict on alternating days.

Proposal 47 & 48: I oppose. I urge the Board to reject these proposals and allow ADF&G to manage the already highly restricted PWS S03E drift gillnet fishery with the management tools they already have in place.

Proposal 49, 50, 51, 52, 53, 54, and 55: I oppose. I urge the Board to reject these proposals. Hatchery production within PWS / CR was created to strengthen the depletion of wild stocks to allow for the continued use by future generations; hatcheries have also shown to be a success and as well a benefit to all the user groups, communities, and State of Alaska.



Proposal 57: I support. The Board should pass this proposal. This can bring several benefits: 1) it will allow for a deckhand who is aspiring to become a vessel owner/operator to spread out the financial risk of initial startup costs by purchasing a permit first then over time acquire the commercial fishing equipment. 2) the aspiring deckhand/ permit holder will be able to show a more thorough track record by using their permit as a “walk-on” permit holder while bringing an incentive to the vessel that they would work with. 3) reduce the amount of active commercial fishing gear during commercial fishing openers, which will ultimately reduce navigational congestion within various areas of PWS (e.g. Valdez Arm / Valdez Narrows and Coghill District). 4) incentivizing two permits on one boat will lead to a reduction of participating commercial fishing vessels creating an increase in demand among the salmon buyers allowing for the potential for improved quality and higher return on fish prices for catcher vessels, therefore directly benefiting the communities and State of Alaska that financially benefit from raw fish taxes (I.E. higher fish prices = more tax revenue). The intent of this proposal should be amended to include a similar option for the PWS S03E drift gillnet fishery modeled after the Bristol Bay permit stacking method.

Proposal 59: I support. The Board should pass this proposal, because in recent years with strong salmon returns there has been observed unutilized harvestable surplus of salmon in closed waters in Orca Inlet.



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in the Kenai Peninsula Borough, and I participate in the subsistence, sport, and public salmon fisheries of the Prince William Sound region. I eat fish, and my grandson fishes in Prince William Sound.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region,



especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Eva Stovall  
grandmastovall@hotmail.com  
(907) 235-4111



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I am a resident of the State of Alaska and commercial fish in Prince William Sound. As a commercial fisherman, I plan to reside here for the long-term. Salmon fishing in the Prince William Sound is the basis for my livelihood.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Evenn Moore

[evenn.woodenaxe.moore7@gmail.com](mailto:evenn.woodenaxe.moore7@gmail.com)

Submitted By  
Ezekiel Brown  
Submitted On  
11/15/2021 1:54:11 PM  
Affiliation



PC084  
1 of 3

Chairman and members of the Board,

My name is Ezekiel Brown, I have lived and fished for sport, subsistence and commercially in Cordova and Prince William sound my whole life. I currently commercially seine for salmon and shrimp trawl in PWS. In the past I have participated in the PWS tanner crab commissioners permit fishery and Drift gillnetting.

### **#1 Support**

With the reduction in the cod fishery harvest of skate in PWS has also dropped for no reason highlighting the necessity for this to be its own directed fishery.

### **#5 Oppose**

I believe we should leave the setting of escapement goals to ADFG using the best available science.

### **#6 Support**

In addition to being a useful management tool in season, in season reporting also greatly increases the accuracy of the reports as people may lose track of their notes or not accurately remember dates or harvest numbers when filling out harvest reports after the season. In season reporting is used extensively in game hunts throughout the state there is no reason why a similar system can not be implemented in fisheries but it will take board action to prioritize this change.

### **#7 Support**

The commercialization of subsistence harvest should never be allowed.

### **#9,#10,#11 Support**

I don't believe dipnetting from a boat is the same in any way to dipnetting from the bank. Gillnetters are prohibited from using mechanical power to move their nets or maintain position and likewise so should dip nets. If you dip net with an engine from a boat you are not dipnetting you are trawling.

### **#14, #15 Support**

A Dip Net made out of gillnet mesh should be defined as what it is, a gillnet.

### **#18 Oppose**

This will only increase the harvest efficiency of boats and move the congestion further down river.

### **#19 Support**

The current management system is extremely one sided in putting the burden of conservation solely on the backs of the commercial fleet on years of below average returns. All user groups should share the burden of conservation.

### **#20 Support**

I do not understand why a PU harvester upriver is allowed to harvest 25 salmon for a household of one while I, a subsistence harvester in Cordova, can only harvest 15.

### **#21 oppose**

An earlier start date with no mechanism tied to down river abundance indices of king salmon will no doubt increase the harvest of king salmon during a time when king salmon are at historic lows.

### **#28 oppose**

As a subsistence user on the Copper River I have plenty of salmon every year with the current limits. Harvesting and making use of 60 salmon is no small task and an unnecessarily large limit for a household of two.

### **#29 Oppose**

I do not believe this is necessary. Subsistence opportunities are numerous right next to town.

### **#31 Oppose**

This is reallocation of the resource to sport fishermen



### **#38 Support**

In years with weak coho returns the sport fish division has not responded rapidly or adequately enough to allow for adequate escapement in the heavily fished systems.

### **#39 Support**

Being one of the easiest to access coho runs near cordova lbek sees immense fishing pressure. There is never a time of day when this small system doesn't have dozens of fishermen and every year the pressure only intensifies. Without action by the board I have no doubt that this run will be severely diminished in my lifetime.

### **#40 Support**

This is an obvious spawning bed right next to the highway that gets more and more pressure every year. You will regularly see fishermen pulling spawning coho out of here very late in the year after run entry has ceased.

### **#41 Support**

Adfg has shown they have the ability to manage the king salmon return without this regulation. Without this regulation adfg would be able to open the safer inside fishing grounds during extreme weather periods when fishing pressure will be minimal. Currently even if it is blowing 50kts they are forced to send this small boat fleet into the gulf of Alaska at the beginning of the season when all the fishermen most need to make some money.

### **#43 Oppose**

The purpose of the Prince William sound allocation plan is to allocate PWSAC produced salmon. That is what it was designed to do and it has done a reasonably good job keeping the gillnet and seine user groups remarkably close to their allocation considering variability in runs and price. Therefore I see no reason to open up this plan up to adjustments.

### **#46 Neutral**

Since I made this proposal I have sold my gillnet permit and operation.

### **#47,#48 oppose**

These regulation changes are purely allocative as it will result in reduced area for gillnetters to fish when there is no biological reason. If there is not adequate escapement in nearby areas the department has the ability to and does often restrict openings in these districts. The allocation plan makes no attempt at allocating certain species of salmon to individual gear groups and instead focuses on fishing areas. Attempting to have management allocate each individual run to a select gear group would be largely impossible due to the close proximity of the fishing districts and hatcheries in Prince William sound.

### **#50,51,52,53,54,55 Oppose**

The hatchery system in Prince William Sound is working very well the way it is and I see no evidence of negative impacts on wild salmon populations. There have been record returns of wild stocks in prince william sound in the last 10 years along with strong hatchery components. There is no biological reason for the board to consider these proposals and would only result in unnecessary regulation and expense.

### **#56, 57 Support**

I don't believe any seiner in Prince William sound would say that in the last 30 years this fishery has been able to support all 267 permits and the data supports that. Since 1991 when the fleet was at its highest participation of 251 permits the number of active permits dropped to 104 active permits in 2004 and then recovered to a peak of 238 active permits in 2019 and has been declining again since then. With a permit stacking regulation all permit holders would be able to get some value from their permit even when the fishery cannot support all 267 boats and crews.

### **#58 support**

Same reasoning as opposing #47,48

### **#59 Support**

I have seen large runs of pink salmon go unharvested in this area and there is little risk of illegal fishing so close to town.

### **#60 Oppose**

The department did a very good job with the placement of the stream markers and in many cases they are not pla distance from a stream but on the actual extent salmon tend to back out of the stream. I do not believe the departme work to confirm if these gps coordinates are in fact at the same location as the old signs. If the old signs are left up a coordinates are in different locations it will cause a lot of confusion.



**#61, 62 support**

I have seen strong evidence of cucumber abundance in PWS. This fishery should be opened and I fear without board action the department will continue the status quo of no fishery with no biological justification.

**#63,64,65,66,67 Support**

Without an adjustment to the GHL for golden king crab it is unlikely the department will ever execute a fishery. There is no reason to have a minimum GHL for a species like Golden king crab as even a very small fishery could be economically viable and provide much needed data on abundance. While commercial fishing for tanner crab I saw a large abundance of golden king crab without even attempting to target them. We could have a very healthy golden king crab population but without a small scale fishery to assess it we may never know.

**#69, #72 Support**

The Prince William sound tanner crab fishery has not been opened in my lifetime. It is ridiculous to keep this fishery closed.

**#74 Support**

**#75, RC4 Oppose**

The trawl survey has been shown to be a completely inadequate tool to survey crab populations in PWS as there is simply not enough good bottom near the crab grounds to get a good data set. Additionally any Tanner crab harvest strategy must only use male crab >5" and not the historical and now irrelevant number of >5.3". When fishing the commissioners permit fishery we saw large numbers of crab in old shell condition right at or below 5". Finally, separate district biomass estimates would not work because the crab population is known to move between these districts. I urge the board to reject this proposal and instead simply amend the current harvest strategy to only refer to legal crab >5".

**#76 Oppose**

Without a viable management plan in place we must keep the commissioner's permit fishery available.

**#77 Support**

**#78 Support**

**#79 Support**



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

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I live in Homer, Alaska, and I participate in the commercial salmon fisheries of the Prince William Sound Region. I depend on PWS salmon fishing income. Lots of bills need to get paid, without PWS salmon I would lose everything.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Faliley Kuzmin  
falkuzmin@yahoo.com  
(907) 435-7497



**From:** [Forest Jenkins](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Unable to insert table into comments  
**Date:** Tuesday, November 2, 2021 1:18:29 PM  
**Attachments:** [image.png](#)

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To whom it may concern,

I submitted my comments online but I was unable to submit a table within my comments. Below are my comments with the table included. Could you insert the table into my comments in the appropriate place? Thank you.

Forest Jenkins

### **2021 Board of Fish Written Comments**

Ms. Chair and Board Members,

Thank you for the opportunity to comment prior to the upcoming 2021 Board of Fish Meeting. My name is Forest Jenkins and I currently live in Homer, AK. I am the current Prince William Sound Setnetter's Association President, and I have been an active PWS setnet permit holder for 8 years. Prior to purchasing my own permit, I was a setnet crew member for 5 seasons in the Eshamy District.

**Proposal 27- OPPOSE** Proposal 27 suggests opening subsistence fishing seven days a week surrounding the commercial season, in addition to the current regulation. This is completely unnecessary, as there is already a subsistence plan in place that allows plenty of time and area to harvest subsistence fish.

**Proposal 42- OPPOSE** Proposal 42 is requesting to lower the allocation trigger point for the setnet gear group to a unrealistic, sensitive, and low trigger point that will continuously put us out of compliance. The original goal of the allocation plan was for all user groups to remain in compliance, and if they did exceed their triggers, the correlating emergency orders would promptly bring them back within their allocation. A trigger of 0.25% allows no flexibility and would constantly force us to be out of compliance. This proposed regulation change would have a severe, detrimental effect on the set gillnet gear group and would not accomplish the goal of the Prince William Sound Salmon Allocation Plan (5AAC 24.370).

Clearly, our allocation percentage is strongly linked to the seine and drift harvests. Both the setnet and the drift gear groups are out of compliance when the seine harvest is low. This is very clear in 2006-2008 and again in 2020. Other than the low average seine harvests from 2006-2008, the set gillnet gear group was out of compliance 4 years. Of those 4 years, the set gillnet gear group was only out of compliance for 2 consecutive years, showing that the trigger is efficiently working.

The author of this proposal completely disregards the Alaska Board of Fisheries Allocation Criteria (Alaska Statutes 16.05.251. Regulations of the Board of Fisheries. (e)). The author does not take into account that the Eshamy District has historically been a setnet fishery many years prior to the involvement of the drift fleet. The Eshamy District is the only district available for the set gillnet gear group to benefit from. The set gillnet gear group has no other alternative fisheries resources available, while the drift and seine gear groups have multiple districts available to harvest salmon.

Dating back to the 1984 Board of Fish meetings when the Main Bay Salmon Hatchery Harvest Plan was established (5AAC24.367), it was acknowledged that the set gillnet gear group would benefit most from the Main Bay Hatchery. With no alternative fishing resources available and the history of setnetting in the Eshamy District, it is clear that our allocation and trigger are both justifiable, fair, and efficient.

We ask that you not approve Proposal 42. Similar proposals in the 2008 and 2014-15 BOF meetings were already rejected (Scott Seaton Proposal 75 2008 Board Cycle (HQ-08F-51) and Jeff Olsen Proposal 10 2014-15 Board



Cycle (EF-C14-039)). These proposals suggested to remove our trigger and essentially force us out of compliance regularly. The author of Proposal 42 is suggesting we only have a 0.25% trigger, which again forces us to constantly trigger emergency order for being out of compliance. We must retain our 1% trigger in order to meet the goal of the allocation plan. The allocation plan intends to keep us in compliance, and both the previous Board Cycle Proposals and Proposal 42 in this meeting cycle would consistently encourage the set gillnet gear group to exceed their allocations (Alaska Board of Fisheries Findings on Prince William Sound Management and Salmon Enhancement Allocation Plan #2006-248-FB).

Table Below from Alaska Department of Fish and Game.

Five year rolling average allocation percentages by gear type, 2006–2020.

Management Year	Drift gillnet	Purse Seine	Set Gillnet
2020	52.30%	47.70%	5.40%
2019	43.10%	56.90%	4.70%
2018	46.70%	53.30%	5.20%
2017	47.00%	53.00%	5.10%
2016	44.70%	55.30%	4.50%
2015	44.60%	55.40%	4.30%
2014	46.30%	53.70%	4.30%
2013	42.40%	57.60%	4.10%
2012	39.00%	60.90%	3.70%
2011	41.00%	59.00%	4.00%
2010	37.90%	62.10%	3.70%
2009	42.90%	57.10%	5.30%
2008	52.40%	47.60%	6.00%
2007	54.60%	45.40%	6.30%
2006	56.89%	43.11%	5.84%

**Proposal 43-SUPPORT** VFDA enhanced salmon should be included in the regional plan, so all user groups can benefit from the value of the VFDA production.

**Proposal 44- OPPOSE** Proposal 44 is completely unnecessary, and the author’s request is an inconsistent and reckless attempt to correct allocation criteria that is already working efficiently.

There is no reason to change the current allocation corrective action criteria for the setnet fleet. If the setnet fleet exceeds the trigger, we should be limited to 36 hours per week and still be able to fish a portion of both openers. It is especially risky at the end of the season and could have much more dramatic effects on the setnet user group than intended if we are only limited to one opener per week. Presently, limiting the setnet gear group to two short openers totaling 36 hours per week still limits our harvest but does so in a more gradual way that has worked since the allocation plan was established. Our current trigger and correlating emergency order efficiently return our harvests to within our allocation but does not have the intention of dramatically affecting the livelihood of individuals within the setnet fleet.

There will always be variability in the management and nature of the run that determine the extent of the emergency orders put into place each season. We cannot change the allocation triggers and corrective action criteria based on single seasons. Over time, this trigger has been very effective and has been a reasonable cutback to the set gillnet group. The proposed emergency order could have severe detrimental effects on the set gillnet gear group.



If we were only allowed one opener a week after July 10th, there would be very few permit holders that stagnant for a week waiting for the next fishing period. We only have one district to operate in. If our district is closed for a week, we cannot fish for a week, while the drift and seine fleets have multiple districts they can benefit from if one of them is closed.

The author of this proposal completely disregards the Alaska Board of Fisheries Allocation Criteria (Alaska Statutes 16.05.251. Regulations of the Board of Fisheries. (e)). The author does not take into account that the Eshamy District has historically been a setnet fishery many years prior to the involvement of the drift fleet. The Eshamy District is the only district available for the set gillnet gear group to benefit from. The set gillnet gear group has no other alternative fisheries resources available, while the drift and seine gear groups have multiple districts available to harvest salmon.

The author of this proposal complains about the setnet fleet being above allocation twelve times and exceeding their trigger eight times over that last 15 years. With all the variables within a fishery, it is impossible to expect user groups to be in 100% compliance each and every year. The allocation plan is meant to work over time and gradually make corrections without significantly damaging the livelihoods of the user groups.

From 2006 to 2020, the seine fleet exceeded their trigger eight of the 15 years. If in fact there is an allocation issue here, the punishment should not be inflicted on the setnet gear group over a single percent of the common property fish when the allocations are most significantly affected by the drift and seine harvests. The setnet harvest has a minimal effect on the drift and seine allocations.

Other than the low average seine harvests from 2006-2008, the set gillnet gear group was out of compliance 4 years. Of those 4 years, the set gillnet gear group was only out of compliance for 2 consecutive years in 2017 and 2018, showing that the trigger and correlating emergency order put into action is efficiently working.

Dating back to the 1984 Board of Fish meetings when the Main Bay Salmon Hatchery Harvest Plan was established (5AAC24.367), it was acknowledged that the set gillnet gear group would benefit most from the Main Bay Hatchery. With no alternative fishing resources available and acknowledging the history of setnetting in the Eshamy District, it is clear that our allocation, trigger, and corrective action criteria are justifiable, fair, and efficiently working.

We ask that you not approve proposal 44, as the current setnet gear group trigger and correlating corrective action criteria are clearly working efficiently to keep us in compliance with the Prince William Sound Management and Salmon Enhancement Allocation Plan.

**Proposal 45- SUPPORT** As the author of this proposal, we encourage you all to approve this regulation change to restore the original intent of the Board. This is not an allocative issue or a biological issue. It is an enforcement issue that needs to be resolved to reduce gear conflict and alleviate unnecessary confusion and stress on law enforcement in the Main Bay Subdistrict THA.

#### **PROPOSAL 45**

##### **5 AAC 24.367. Main Bay Salmon Hatchery Harvest Management Plan.**

Increase minimum operation distance between set and drift gillnet gear in the Main Bay Subdistrict, as follows:

No portion of a drift gillnet may be operated within 30 fathoms of a set gillnet, except in the zone outside of the offshore end of the set gillnet.

**What is the issue you would like the board to address and why?** We are requesting a change in the distance between gear to restore the original intent of the Board and to increase the safety and reduce the gear conflict in the Main Bay Subdistrict Terminal Harvest Area. With recent management changes due to wild stock concerns and Main Bay Hatchery return shortfalls, the conflict in Main Bay has escalated to a point of pure chaos, especially in the waters inside the THA during build up openers.

We are requesting this change to reinforce the intent of the current regulations that were established in 1984 BOF meetings when the Main Bay Salmon Hatchery Harvest Plan was established (5 AAC 24.367). At this point, the setnet fleet gave up access to all open waters outside of 50 fathoms within the THA and all waters outside of 100



fathoms in the rest of the Main Bay Subdistrict. In exchange, setnetters are allowed to fish their gear 50 apart inside the THA, while the distance between set and drift gear was set at 25 fathoms. These regulations were placed with the assumption that drift gear would not be able to be legally set between set nets 50 fathoms apart. This has not been the case, as drift gillnet permit holders continually claim that they can legally set between setnets and hold their position within a couple fathoms. Illegally, they essentially become setnetters with the added ability to maneuver their 150 fathom net that runs between setnets back to the beach.

To resolve a similar issue in 1996, the Board of Fish took action on a proposal submitted by the Alaska Wildlife Troopers to increase the distance between setnet and drift gear in the Crafton Island Subdistrict from 50 fathoms to 60 fathoms, while the required distance between setnets remained at 100 fathoms (5AAC 24.335). Prior to this change, drifters were attempting to fish a perfect line between setnets 100 fathoms apart. Board of Fish took action to eliminate this ambiguity in regulation and reduce the gear conflict in the Crafton Island Subdistrict.

The action taken in 1996 set the precedent of what the original intent of the regulations were and essentially restored a safe and orderly fishery in the Crafton Island Subdistrict.

Subsequent to the Board approving the increased distance between set and drift gillnets, there has been no increase in the percentage of total catch for the setnet gear group and no imbalance created in allocation between set and drift gillnet harvest district wide.

We request the same be done to reinforce the current regulations in the Main Bay Subdistrict THA. We are proposing to increase the minimum legal distance between set and drift gear to 30 fathoms in the Main Bay THA, while maintaining the current legal distance between setnets at 50 fathoms in the Main Bay THA. This action will eliminate the majority of the gear conflict in the Main Bay Subdistrict THA and would provide law enforcement clarity to efficiently regulate these high conflict build up openers.

As an association, we have proposed this change in three separate Board of Fish Meetings with no success due to perceived allocation issues. However, the original intent of the Board was not to allow drift gillnets to fish between legally spaced setnets spaced 50 fathoms apart within the Main Bay Terminal Harvest Area. The actual outcomes in the fishery are chaos and compromised safety. Therefore, it is imperative the Board look to previously approved (1996) regulation to resolve the ongoing conflict. There are no valid arguments, allocative or otherwise, that prevent the Board from enacting this proposed regulation change. We look to the current Board to rely on the precedent established in 1996 to enact this proposed regulation that will bring this fishery a safe and easily enforced resolution of the current ongoing conflict.

**Proposal 46- OPPOSE** We oppose this proposal, as management already has the ability to allow the use of deep gear under emergency order to prevent the degradation in fish quality in terminal harvest areas, if wild and hatchery escapements permit. In addition, this proposed change in regulation would increase the likelihood of intercepting wild and hatchery stocks of salmon bound for other districts before escapement goals are met.

**Proposal 47- OPPOSE** We oppose this proposal, as management already has ability to close districts to prevent intercepting wild and hatchery runs destined for other districts.

**Proposal 48- OPPOSE** We oppose this proposal, as management already has ability to close districts to prevent intercepting wild and hatchery runs destined for other districts. The author of this proposal also falsely claims that there are no wild chum or pink salmon systems in the Eshamy District. In addition, shutting down the Eshamy District to prevent minimal interception of stocks bound for other districts could lead to major degradation in fish quality and severe economic consequences.

**Proposals 49 thru 55- OPPOSE** We oppose Proposals 49-55, as they are all attempting to reduce hatchery production without reasonable data to justify the regulation change. The passing of any one of these proposals could result in extreme, unnecessary economic and biological effects on the fishery. Without these two viable organizations (PWSAC and VFDA) in the sound, it would be impossible to provide sustainable salmon for all user groups.

**Proposal 58- OPPOSE** The author of this proposal is suggesting daily fishing periods in AFK. The consequence would be a high risk of intercepting sockeye bound for Coghill River, Eshamy River, and Main Bay. Also, the lag



time in the harvest data doesn't allow management to act based on day to day harvests. I encourage you to oppose this reckless proposal that disregards the importance of good management practices, wild and hatchery escapement goals in other districts, and the livelihood of fishermen in other districts.

**Proposal 59- OPPOSE** We oppose this proposal as it encourages opening closed waters that are meant to protect wild escapement goals. This proposal could cause enforcement and biological concerns.

**Proposal 60- SUPPORT** We support this proposal, as long as the updated GPS locations do not affect historic lines and setnet leases.

Thank you for the opportunity to comment.

Forest Jenkins  
Prince William Sound Setnetters' Association

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Forest Jenkins  
Partner at River Valley Burgers  
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November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Cordova, Alaska, and I participate in the commercial, subsistence, and sport salmon fisheries of the Prince William Sound Region.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region,



especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Fred Newirth  
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Submitted By  
Galina GLASIONOV  
Submitted On  
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30%+ of Alaskans depend on dipnetting at Copper River and at least double of that on Kenai and Kasilof Rivers. Cooper River dipnetting is not an easy fishing grounds and there are yearly reports of lifes lost there.

The propositions made by The Copper Basin Advisory Committee at their large are made not by biologists or sientists, but by people from local areas, who are people of personal interests and their opinions are totaly biased.

If changes has to be made, they should be based on marine reseach and opinion of commpetent people without personal interests. If limits have to be established they have to be through out the line: Sport, Personal use, Subsistense and especially Commercial Fisheries, not just at the mouth of Cooper but at salmon feeding grounds in the Ocean.

Boat dipnetting has to remain avilable, however limits may need to decrease along with limits for other fisheries.

About the Propositions:

Oppose: 6, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 41

Support 5, 7, 16, 18, 20, 21, 22

Thank you



Submitted By  
Gene McCabe  
Submitted On  
11/10/2021 2:05:47 PM  
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Proposal 6 - **OPPOSE** The current reporting works well and is not reliant upon limited connectivity in the fishery area.

Proposal 7 - **STRONGLY OPPOSE** The use of licenses and experienced guides reduces risk of injury or death in the area and reduces people trespassing to access the water.

Proposal 8 - **OPPOSE** Language lacks needed specificity regarding access at popular access points.

Proposal 9 - **OPPOSE** Same as Proposal 8 - requires additional specificity on access to the fishery

Proposal 10 - **OPPOSE** Same as Proposal 7, the use of boats piloted by experienced guides or private operators enhances the safe harvest of fish and reduces trespass and injury accessing the fishery.

Proposal 12 - **STRONGLY OPPOSE** boats and shore fishers can coexist safely and without impact to one another. Shore netters should not create a hazard to navigation of a navigable waterway.

Proposal 13 - **STRONGLY OPPOSE** Fish wheels are clear hazards easily avoided by mariners on a navigable waterway and there is no evidence passing boats impact fish wheels in any manner

Proposal 14 and 15 - **STRONGLY OPPOSE** responsible anglers can avoid fish injury using the current allowable gear.

Proposal 16 - **STRONGLY OPPOSE** the responsible use of sonar for navigation hazards is a safety issue for all mariners and fishers. Sonar is a well known and available technology to detect snags and submerged hazards to navigation.

Proposal 17 - **STRONGLY OPPOSE** this proposal penalizes safe harvest of the fishery and burdens personal use fishers needlessly.

Proposal 18 - **STRONGLY SUPPORT** the addition of drift area will only serve to reduce congestion and increase safe operations.

Proposal 19 and 20 - **STRONGLY OPPOSE**

Proposal 21 and 22 - **SUPPORT**

Submitted By  
George Heiser  
Submitted On  
11/15/2021 4:03:51 PM  
Affiliation  
Resident



PC090  
1 of 1

Proposal 6 -Oppose! Reporting as of now is works fine and requiring 3 day reporting impacts travel plans because of lack of internet access in the area could impact peoples travels plans and will reduce tourism opportunities for local businesses.

Proposal 7 - Strongly Oppose! Banning guide services will prevent access to thousands of users who do not own a boat or do not wish stand on slippery rocks or wade into the fast current to try and catch fish. Properly licensed and vetted Guide services provide safe access to residents who would otherwise be unable to participate.

Proposal 8 - Oppose! Language is too vague and would restrict access to the Personal Use and Subsistence Fishery at the Bridge, O'Brian Creek, Terral Creek, Eskaleta Creek and Haley Creek. All of these drainages are popular access points for users.

Proposal 9 - Oppose! Language is too vague and would restrict access to the Subsistence Fishery at the Bridge.

Proposal 10 - Strongly Oppose! This proposal lacks common sense and would effectively force everyone to Dipnet from the shore leaving dip netter to stand on slippery rocks or wade into the river. This puts users at undo risk.

Proposal 11 - Strongly Oppose! This proposal would like all boaters who navigate their boats into the canyon could only tie off to the canyon walls or shore. As a professional mariner I feel that forcing lay people to navigate their boats into very very sketchy currents is a receipt for disaster and puts undue risk to the fisherman and their passengers.

Proposal 12- Strongly Oppose! There are a few places in the PU fishery that this interaction occurs. There are only a handful of locations to safely Dipnet from a boat in the PU where as there is nearly 20 miles of river bank for people who wish to Dipnet from shore can. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetter who wade into the water in the same drift as boats are putting themselves at risk and present a hazard to navigation. By pushing out 30-40' poles these folks run their nets under the running gear of the boats presenting a possibility of fouling the motor and setting the vessel dead adrift creating a safety hazard for the captain and crew.

Proposal 13 - Strongly Oppose! Fish wheels are stationary hazards that boats avoid. By limiting navigation near fish wheels the proposal could eliminate access to the entire length of the Kotsina flood plain just above the bridge forcing everyone to fish across the river on the West Bank of the Copper. One person's "too close for comfort" is not another's. Data needs to be provided that demonstrates actual accidental contact or fouling of Dipnet gear from a boat with a Fishwheel. The hazard lies with the boat operator who could expect to capsize on contact with a wheel and thus can navigate around this hazard with this knowledge. Whether its a Fishwheel operator who drives a boat to their wheel or a dipentter the boat is only a momentary sound that quickly passes and does not impact fishing success. If it did the Fishwheel operator would not run a boat near their wheel.

Proposal 14 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 15 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar on while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, aerial spotters and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more and aide to navigation than to find fish. The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards. In discussing this proposal this with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied."

Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer more time effective method of take and an additional burden on the user to obtain multiple permits and additional reporting.

Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. On busy days this area can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long" there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition though incrementally small adds a drift that is safe to navigate. This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who what to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.

Proposal 22 -Support!



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Seward, Alaska and I participate in the commercial salmon fisheries of the Prince William Sound region. I have lived in Seward, AK for over 20 years. I work in fish processing plant (OBI). We served the fishing community here in Seward. We help feed people from all over the USA and the world. Prince William Sound is more important to me, my friends and my family. The "Sound" is a large part of my livelihood and also people in our great community of Seward. Yes, from people around our great country and beyond. Salmon Season is in the blood of our co-workers and fishing family. Mid May everyone is gearing up for the following salmon season. It supports more than fisherman and processors. Think of all the vendors supporting the fisherman and processing plants. The "Sound" is in all of our blood, sweat and tears. It's the air we breath. Yes, science is important for all of us. Please don't take our lives away from us. Please follow the science it's our lives. Thank you.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Gilbert Sheridan

[Gil.Sheridan@obiseafoods.com](mailto:Gil.Sheridan@obiseafoods.com)

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Submitted By  
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Submitted On  
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Reporting impacts travel plans because of lack of internet access in the area could impact peoples travels plans and will reduce tourism opportunities for local businesses.

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Proposal 15 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar on while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, aerial spotters and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more and aide to navigation than to find fish.

The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal this with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied."

Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer more time take and an additional burden on the user to obtain multiple permits and additional reporting.



Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. Or can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition though incrementally small adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who what to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.

Proposal 22 - Support!



Submitted By  
Heather Maxcy  
Submitted On  
11/12/2021 5:40:39 PM  
Affiliation

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## Heather L Maxcy

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November 12, 2021

Board of Fisheries  
Alaska Department of Fish and Game

Dear Board Members,

I am writing to address the Board of Fish Proposals that will be addressed in the upcoming meeting in Cordova, November 30 - December 6, 2021. The decisions made at this Board of Fish meeting will impact both the economic viability of Copper River salmon and its future as a resource for all user groups. The legendary and vibrant resource that is the Copper River fishery deserves informed and scientifically based decisions now more than ever if our children and their children are to experience this unparalleled resource.

**Proposal 1: I support** establishing a skate fishery in PWS as it would add to the economic income of small boat fishermen and the economy of the small surrounding communities such as Cordova. Current data indicates that a small scale fishery would in no way negatively impact the skate population.

**Proposal 5: I oppose** establishing an optimum escapement goal for Copper River king salmon when ADF&G already has a sustainable escapement goal in place.

**Proposal 6: I strongly support** requiring in season reporting of subsistence, sport fish, and personal use harvest and effort. The commercial fleet reports every period. To delay reporting of harvest until after the fact is a reactionary method of management versus a proactive method of management which puts this valuable resource in jeopardy. Subsistence, personal use and sport fishing are impacting the fishery exponentially more than ever before. Current catch data from all user groups aids in appropriate and informed management decisions.

**Proposal 8, 9, 10: I support** all three of these proposals as they are an attempt to reverse the recent practice of dipnetting or trawling from a boat to get personal use and subsistence fish. The majority of charter boat operators utilize this method. It is not customary or traditional and, due to its efficiency, is very detrimental to the resource.

**Proposals 14, 15: I support** eliminating monofilament and multifilament mesh material in dip nets as it causes harm to an at risk resource. Switching to an inelastic mesh net (seine -style) will decrease the mortality rate of the released king salmon.

**Proposal 18: I oppose** expanding the personal use fishery when the Copper River fishery is strained and additional restrictions of time and area are being placed on the commercial fleet. Expanding the personal use fishery is not warranted when there is concern over the health of the resource.

**Proposal 19: I strongly support** trying to conserve the few fish that are making it to the spawning grounds. This proposal imposes restrictions on the upriver users and makes an attempt to conserve an invaluable resource for all user groups. Currently, the commercial

fleet shoulders the entire burden of the conservation on this fishery with unprecedented reductions in time and area. commercial fleet has not and will not protect the resource enough to ensure its continuation.



**Proposal 21:** I **oppose** increasing the personal use season when the commercial fleet has seen unprecedented declines over the health of the fishery resource. The personal use of this resource is occurring where the fish are the most vulnerable and where they cannot easily escape to spawn.

**Proposals 38, 39, 40:** I **strongly support** these proposals because they are needed to conserve our coho returns. I love to sport fish, however, there has been unprecedented pressure from sport fishermen and it is negatively impacting both the resource and the fishing experience. I would like to think that the board cares enough to ensure that our children will still have a sport fishing opportunity in Cordova in the years to come.

**Proposals 49-55:** I **strongly oppose** these proposals because they are not being proposed based on independent scientific review. Their aim is strictly to reduce hatchery production.

**Proposals 61-67, 69-72:** I **support** these proposals because they seek to increase winter fishing opportunities for Cordova's small boat fleet and current proposals will not negatively impact the populations.

Sincerely,

Heather L. Maxcy



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private nonprofit salmon hatchery program.

I live in Valdez, Alaska. I participate in the commercial fisheries in Prince William Sound. I am a first-generation commercial fisherwoman and permit holder in Prince William Sound, Alaska. I have claimed Valdez as my home and have worked hard to create bonds and partnerships with like-minded stake holders in the industry and community. I have started building a business and a home to keep me grounded in Alaska for years to come. I am engaged in responsible harvesting of hatchery salmon in Prince William Sound. My livelihood and entire future depends on salmon fishing. I have plans to keep this boat and industry running for the rest of my working years. It is very important to me to see progressive action towards enhancing what systems are already in place as well as instigating creative approaches to new ideas. I work closely with local businesses to keep the boat running and the local economy healthy.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive



impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Hope Finley  
[finley.hope@gmail.com](mailto:finley.hope@gmail.com)  
(907) 370-3258



November 14, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I participate in the salmon fisheries of the Prince William Sound region through processing. Our company is one of the largest shore based processors in Alaska. We own and operate 10 plants, two of which are located in Prince William Sound area. We have two processing plants in that region that are heavily depend on local fisheries.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

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The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Irina Zilanova  
irina.zilanova@obiseafoods.com

Submitted By  
Isaac Hutchison  
Submitted On  
11/15/2021 3:28:49 PM  
Affiliation



PC096  
1 of 1

- Proposal 6 – Oppose
- Proposal 7 – Strongly Oppose
- Proposal 8 – Oppose
- Proposal 9 – Oppose
- Proposal 10 – Strongly Oppose
- Proposal 11 – Strongly Oppose
- Proposal 12 – Strongly Oppose
- Proposal 13 – Strongly Oppose
- Proposal 14 – Strongly Oppose
- Proposal 15 – Strongly Oppose
- Proposal 16 – Strongly Oppose
- Proposal 17 – Strongly Oppose
- Proposal 19 – Strongly Oppose
- Proposal 20 – Strongly Oppose
- Proposal 18 – Strongly Support
- Proposal 21 – Support
- Proposal 22 – Support



Submitted By  
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11/10/2021 9:17:44 AM  
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To the Alaska Board of Fisheries,

I oppose, the Commercial Finfish Proposals #49 through #55

As Clem Tillion said at the hatchery meeting in October of 2018, "Don't mess around with what works." The hatchery program has been one of the most successful non profit organizations in Alaska. This program has provided a sustainable source of food and employment for thousands of people. The Prince William Sound hatcheries, have seen the return of more than thirty generations of salmon to the region with continuing robust returns. These returns have secured the livelihood of the fisherman involved in the harvest in PWS. With the harvests of the salmon, the program has provided food security on a national level. Any disruptions to the hatcheries production of salmon would have severe consequences to the Alaskan economy, and national food security.

Ivan Stonorov

Life long Alaskan, commercial and sport fisherman.

currently PWS Seiner

Submitted By  
J Denison  
Submitted On  
11/14/2021 9:09:47 AM  
Affiliation



PC098  
1 of 1

**Proposal 6 - Oppose!** Current reporting procedures are fine

**Proposal 7 - Strongly Oppose!** I've used guide services for the past 5 years due to being unable to stand or even navigate getting to a spot on the rocks because of back issues. Banning these services would make me unable to dipnet

**Proposal 8 - Oppose!**

**Proposal 9 - Oppose!**

**Proposal 10 - Strongly Oppose**

**Proposal 11 - Strongly Oppose!**

**Proposal 12- Strongly Oppose!**

**Proposal 13 - Strongly Oppose!**

**Proposal 14 - Strongly Oppose!** King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

**Proposal 15 - Strongly Oppose!** King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

**Proposal 16 - Strongly Oppose!**

**Proposal 17 - Strongly Oppose!**

**Proposal 18 - Strongly Support!**

**Proposal 19 - Strongly Oppose!**

**Proposal 20 - Strongly Oppose!**

**Proposal 21 - Support!**

**Proposal 22 - Support!**



Submitted By  
Jack G Stevenson  
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11/14/2021 12:19:33 PM  
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#### Proposal #45

I strongly oppose proposal #45.

The fishable area is already such a small space for both user groups in the main bay subdistrict. There is almost no areas to get a driftgillnet on the beach as it is in most parts of falls bay and main bay. Creating more distance will just be taking away the little areas we have left to fish on the beach. We need to keep the fishery even for both user groups.

I strongly urge to board to reject this proposal and leave the regulations the same as previous years.

#### Proposal #44

I strongly support proposal #44

With the current regulations, the set netters are getting the most opportune fishing time after they have already met their allocation of 4%. The drift gillnet group should be getting the AGZ after a weekened of build up fish to prevent the set netters from continuing to go over their allocation.

I strongly urge the board to pass this proposal and put it into effect.

#### Proposal #7

I strongly support proposal #7

There has been an ongoing issue of several companies charging money to guide clients on the upper copper. The subsistence fishery of the copper was not intended to be commercialized.

I urge the board to pass this proposal and put some regulations on the personal use and subsistence fishery on the upper copper. The small run of salmon has more and more pressure year after year with the growing number users coming from anchorage and surrounding areas.



Submitted By  
jacki Bond  
Submitted On  
11/15/2021 7:37:07 PM  
Affiliation

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Anchorage, Alaska 99515

I wish to voice a strong objection to proposal 9, eliminating the use of boats in the Glennallen sub district.

My family and I rely on the ability to harvest salmon under a subsistence permit on the Copper River. This proposal would greatly reduce our fishing opportunities and limit the number of fish we count on throughout the year. A concern was voiced regarding the number of fish reaching the spawning areas; however, the annual harvest from subsistence is significantly lower than that of commercial or personal use. I believe it would be more beneficial for all parties to lower the limit of fish per permit rather than close off boat access. We are very fortunate to live in a state with subsistence opportunities, and I believe they should be protected for all those families who depend on a subsistence way of life.

Thank you for your time,

Jacki Bond