

On-Time Public Comment List

Alaska Board of Fisheries Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish
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November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Soldotna and have a vested interest in the productive salmon fisheries in all regions in the state. All user groups benefit from the presence of robust hatchery programs and the State of Alaska benefits from taxes as a result of salmon returns, not to mention the positive economic impact hatcheries have in communities all over the state.

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.

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,

Abigail Turner Franke
Abigail.jeannette@gmail.com
(907) 953-0929



Ahtna Intertribal Resource Commission

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15 November 2021

To the Alaska Board of Fisheries:

Below are comments from the Ahtna Intertribal Resource Commission regarding the Board of Fisheries proposals currently under consideration for Prince William Sound, the Upper Copper River, as well as statewide proposals. Thank you for your consideration.

PRINCE WILLIAM SOUND (INCLUDING UPPER COPPER AND SUSITNA RIVERS) FINFISH AND SHELLFISH (EXCEPT SHRIMP) PROPOSALS **Commercial Groundfish**

PROPOSAL 5

5 AAC 24.361. Copper River King Salmon Management Plan.

Establish an optimal escapement goal for Copper River king salmon, as follows:

Adopt an optimum escapement goal for Copper River King Salmon:

Sustainable Escapement Goal, current 24,000 lower bound Sustainable Escapement Goal, ADF&G revision 21,000-31,000 **Optimum Escapement Goal, proposed 24,000-40,000**

The proposed OEG can be expected to provide high levels of both yield and recruitment. ADFG Memorandum of March 16, 2020 reported that the optimum yield profiles suggest yields diminish as you approach 40,000 spawners, which justifies an upper boundary for an escapement goal.

What is the issue you would like the board to address and why? A precautionary escapement goal is necessary for Copper River King Salmon because the aggregate goal is unlikely to provide adequate protection for the dozens of populations that occur in this very large and diverse basin. The aggregated goal may not provide adequate protections to maximize yield or recruitment of different populations with different run timings and varying levels of productivity. This problem is reflected in a very high degree of variability in the historical stock-recruitment data for the aggregate stock where escapements between 21,000 and 31,000 can produce run sizes of anywhere from 30,000 and 110,000.

PROPOSED BY: Kenai River Sportfishing Association

Comments:

We support Proposal 5 as written. The king salmon escapement goal should not be lowered, as the department is proposing to do, because it has not been met in recent years. As written, this proposal



would establish an escapement goal range that maintains the existing 24,000 king salmon as the lower bound. While we have concerns about whether this proposal is adequate, it is certainly a better alternative than the department's plan of lowering the escapement goal to 21,000 king salmon, which would result in more king salmon harvested by the commercial fishery, and fewer king salmon on the spawning grounds.

King salmon have seen marked declines in recent years. Estimated total run size averaged 47,386 for the 2010 – 2019 period, compared with 86,684 for the 1998 – 2007 period (Schwanke 2019: 3; appendix C). In 2010, 2014, 2016 and 2020, estimated Chinook escapement fell below the current minimum escapement goal (24,000). King salmon body sizes have declined in the Copper River and statewide, with smaller female salmon having less eggs. In all likelihood, then, more salmon are required on the spawning grounds in order to produce the same level of recruitment.

We cannot reverse this trend of Chinook decline by lowering escapement goals and putting fewer salmon on the spawning grounds. Already, we are seeing marked declines in body size, reducing the reproductive potential of each fish. Studies have shown that recent cohorts of Chinook are spending only three years at sea, whereas 30 years ago they used to spend four years in the ocean. The department's plan to lower the Chinook escapement goal to 21,000 salmon could potentially exacerbate this already alarming trend. Smaller-sized Chinook salmon necessitate more escapement to compensate for this reduced reproductive potential.

In practice, fisheries are currently being managed for commercial and personal-use, and not for subsistence. This goes against AS 16.05.258 to provide for subsistence. This also goes against the sustained yield principle in the Alaska Constitution.

Reasonable opportunities for subsistence uses did not improve when ADF&G lowered the goal in 2003 from 28,000 - 55,000 to 24,000 or more. This change has not resulted in an improved Chinook population. While we have considered an amendment to increase the escapement goal to address the ongoing concerns, we instead are supporting proposal 5 as it is written in order to urge the BOF to take precautionary action and adopt an OEG.

Upper Copper River Personal Use and Subsistence

PROPOSAL 6

5 AAC 01.630. Subsistence fishing permits; 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan; and 5 AAC 52.XXX. New section.

Require inseason reporting of subsistence, sport fish, and personal use harvest and effort, as follows:

Daily harvest reporting is already required on the Copper River for all fisheries except sport. In- season reporting would be relatively simple and could be done using an online app.

Participants in this fishery are required to report their recorded daily harvests to the department within three (3) days of when those harvests occur. Participants must report harvest attempts for any days during which their fishing gear was in the water, even if these harvest attempts are unsuccessful.

Harvest reports can be made using an online app or a call-in number.



What is the issue you would like the board to address and why? Copper River fisheries managers currently rely on an abundance-based management model that does not collect in-season harvest data and has very little empirical data about actual escapement onto the spawning grounds. This model assumes that escapement can be accurately estimated using on abundance at the Miles Lake sonar and harvests from previous years.

However, recent events suggest that the in-river harvest exceeds what can be biologically sustained and is not detected by our current harvest reporting system. The Gulkana hatchery has not been able to obtain its brood stock since 2015, while the 2018 sockeye run failure caught managers by surprise.

Obtaining accurate in-season harvest information would help to protect against the possibility of over harvest due to variable harvest levels and under reporting post-season.

PROPOSED BY: Karen Linnell

Comments:

We support proposal 6. We feel strongly that there is a need for more timely harvest data in the upriver subsistence, sport and personal-use fisheries. This could help to enable agile and informed management decisions, especially during times of low abundance. If executed well, it could also help to build greater trust between fisheries managers and participants in Copper River fisheries.

Sockeye abundance throughout the 2018 and 2020 seasons was extremely low, resulting in unprecedented restrictions on the personal-use and subsistence fisheries, and the closure of the commercial fisheries for nearly the entire season. While scientists do not know definitive causes for the recent run failures, they have caused alarm among long-term residents of the region, many of whom had already worried about the health of Copper River salmon stocks based on their observations and traditional knowledge. Meanwhile, the upper Copper River personal-use fishery showed a clear trend of increasing participation and harvest during the 2007 – 2016 period, while the subsistence fishery has also seen greater numbers of permits issued in recent years (Botz and Somerville 2017: 35, 45).

Long-term subsistence fishing families are not meeting their needs. The Alaska Board of Fisheries' Amount Necessary for Subsistence uses of salmon in the Gakona to Slana and Batzulnetas reach of the Copper River has been met in only 2 years during the past 15 years since the ANS was adopted. Similarly, ANS has not been met in 3 of the past 4 years in that reach of the river from the mouth of the Tonsina to the mouth of the Gakona. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success as defined in AS 16.05.258(f).

In-season assessment of sockeye salmon and Chinook salmon harvest levels in the upper Copper River could play a role in ensuring the long-term, sustainable management of in-river fisheries. In-season escapement modeling aggregates data from previous years' personal-use and subsistence fisheries, as participants in these fisheries are not required to submit their harvest records until after the end of the fishing season (AS 5 AAC 77.591; 24.360-361). With the recent discontinuation of the Long Lake Weir, fixed escapement enumeration projects in the upper river are limited to the Gulkana Counting Tower and the Tanada Weir (which has been unable to operate the past three years). Aerial surveys depend on favorable weather conditions during a very narrow window of time. Instead, managers use an abundance-based model that relies heavily on the Miles Lake Sonar near the mouth of the Copper River.



Accurate in-season data would help to augment management with an additional source of empirical data on upriver salmon migration.

It should be acknowledged that some ADF&G biologists have previously expressed the view that the current management system is working well, and that there is no need for in-season harvest data. While we tend to believe that more harvest data would be helpful, we acknowledge managers' first-hand expertise, and understand that those who do not see the importance of in-season harvest data have valid reasons for these viewpoints. For instance, there is a chance that having in-season harvest data would change little about how the fisheries are run. In spite of this ambiguity, it is worth implementing this change because of its potential to build greater trust toward management among Copper River fishers. Because current in-season management methods rely heavily on modeling, they tend to be fairly inaccessible to the public. Some fishers and other stakeholders have questioned whether the models are reliable and whether managers have enough information to make informed decisions. Whether well-founded or not, these doubts have grown louder after the low returns of 2018 and 2020. Collecting empirical harvest data in near real-time could help to demonstrate to the public that ADF&G takes their concerns seriously, and is trying to use as much information as possible to inform its management decisions. This would be especially helpful if these harvest data could be presented to the public in an accessible way during the fishing season (e.g. as Miles Lake sonar passage data are presented on the ADF&G website).

While this proposed change would require more frequent reporting, it would not require personal-use or subsistence fishers to report any more data on their harvests than is required currently. Subsistence and personal-use fishers are already supposed to write down their harvest totals each day, by species, and are required to report these totals at the end of each season. Until 1999, ADF&G required personal-use dipnet fishers to report their harvests at the end of each trip, but the system was discontinued when the department made permits available at locations outside of the region (Botz and Somerville 2017). For most users nowadays, it would be easy to do this reporting using an online app. For those without smartphones or reliable internet connections, other options should be made available, such as a call-in number. If the BOF feels that the three-day reporting requirement suggested in this proposal is too onerous, it could amend the proposal to lengthen this time period.

In October, 2020, the Southcentral Regional Advisory Council (SCRAC) voted in favor of requiring in-season reporting for federal subsistence users. Federal subsistence fishers harvest far less than do participants in the state subsistence and personal-use fisheries. Although members of the SCRAC represent the interests of federally-qualified subsistence users, they were willing to support this requirement in the name of conservation and better data collection. In-season data from the federal fishery would be far more useful if it were also available from state fisheries.

In all likelihood, timely reporting would produce better-quality data than does end-of-season reporting. A common problem with the current system is that subsistence fishers often fail to keep their permits up-to-date, waiting to fill them out till the end of the year when they are due, and guessing about their daily catch totals. During years of low abundance, in particular, these data could provide more granular and accurate data on the fishery, enabling more adaptive management decision-making. At the very least, they could help to build trust and consensus between fisheries management and an interested local public. We must take a proactive stance toward salmon management rather than waiting for the next crisis to occur.



PROPOSAL 7

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit guiding in subsistence finfish fisheries, as follows:

5 AAC 01.620

e) The permit holder must personally operate the fish wheel or dipnet. A subsistence fish wheel or dipnet permit may not be loaned or transferred except as permitted under 5 AAC 01.011.

NEW. (1). No guide or transport service shall charge a fee of a permit holder participating in fishery and no permit holder may give a fee to participate in the fishery.

What is the issue you would like the board to address and why? Lack of clarity for commercial enterprises starting to capitalize on subsistence fisheries. There are regulations for no fees to be involved with community permits for subsistence game hunts reference 5 AAC 92.072. It seems counter intuitive then to allow commercial guide entry into a subsistence fishery who then in turn charge people to navigate the boat for them, show them how and where to fish, help them fish, land, and process the catch all for a widely advertised fee structure.

PROPOSED BY: Shawn Gilman

Comments:

We support the concept of Proposal 7 to prohibit a Guide or Transporter to charge a fee to take a subsistence fisheries permit holder fishing in the Copper River. The Community Subsistence Hunt disallows hunters from receiving a fee for the taking of game or receipt of meat. This regulation should also apply to subsistence fishing in the Copper River. Alaska law defines subsistence uses as customary and traditional non-commercial uses (AS 16.05.940(7) and (34)), which should prohibit transporters or guides from charging a fee associated with fishing under a subsistence fishing permit in the Copper River as such activity is not customary or traditional.

Prince William Sound/Upper Copper River/ Upper Susitna River Fisheries Proposals

PROPOSAL 8

5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting near tributary mouths of the Upper Copper River District, as follows:

No dip netting in the confluence 500 yards below and 100 yards above any river or stream in the upper Copper River.

What is the issue you would like the board to address and why? Dip netting in the upper Copper River. If we do nothing we will continue to see our wild stock and Gulkana Brood stock decline. In some drainages that are very small we could lose that entire wild stock. Wild stocks are stopping and resting in these areas before continuing up river. The wild stocks are time sensitive and travel in small groups leaving them very vulnerable to over harvest in these areas. Remember these stocks are in some cases very small. There have been very little studies in these areas and there is virtually no data to support keeping these areas open until there is some kind of analysis. We already have an example of this that exists in the Gulkana confluence and 500 yards below that is fly fishing only. This only lets a sport fisher to take 3 reds and 1 king. The way the current dip net regulation reads, you can fish in the same area and the limit is 200 and in some cases more. This goes against the idea of trying to protect wild up river



stocks and brood stock at the Gulkana hatchery. They have not met their goals at the hatchery in the past 5 years and in some cases very low. This is only one example of how we can start to bring back our brood stocks, both wild and Gulkana hatchery. Something needs to be done soon about this problem. I have done my best to write this proposal in laymen's terms. I could quote several sections from ANILCA that directly relate to this issue. Also there is very little scientific data on this issue.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 8 with modification, such that the adoption would restrict dipnetting around the mouths of salmon-spawning tributaries (as opposed to "any stream or river" as the original proposal is worded). This would protect stock diversity, a particular concern on streams with small spawning populations that can easily be fished out. While returns on these tributaries may be small today, the genetic diversity these stocks provide may be important for resilience and adaptation to environmental change. Some tributaries are easy to access by large numbers of fishers, and are therefore fished at disproportionately high rates.

PROPOSAL 9

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit dipnetting from a boat in the Glennallen Subdistrict, as follows:

Eliminate Dip netting from boats as a method to take from the Glennallen sub district (up-stream from the bridge at Chitina).

What is the issue you would like the board to address and why? A lot of dip netters take fish at the mouths of tributaries off the Copper River. Currently there are markers only on the mouth of the Gulkana River. There are already fish wheels north of the Bridge at Chitina. You can dip net below the bridge at Chitina as well, so there is opportunity to get fish dip netting. By not allowing dip netting above the bridge more fish will make it to spawning areas.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee

Comments:

We strongly encourage the BOF to adopt proposals 9, 10, 11, and/or 13, all of which address the issue of dipnetting from boats. We feel that the dramatic increase in this method's popularity (Botz and Somerville 2017) poses significant conservation concerns. Proposal 9 (submitted by the Copper Basin AC) would prohibit dipnetting from boats in the state subsistence fishery in the Glennallen subdistrict; proposal 10 (submitted by Ahtna Tene Nene') would prohibit dipnetting from boats in both the subsistence and personal-use fisheries in the Upper Copper River; while proposal 11 would require boat dipnetters to tie off to the riverbank while fishing. Adopting any of these proposals would be a strong step toward reining in a technological innovation that is totally unregulated and growing in an uncontrolled way.

Salmon often delay their upriver migration during high water events, resting in deep parts of the river and/or areas such as eddies where the current is less intense. During these times, catch per unit effort for fish wheels and onshore dip netters tends to be quite low. However, dipnetters in boats are able to move throughout the river and target these resting areas. On the middle Copper River (i.e. Chitina – Gulkana), subsistence fishers have observed that when the water begins to recede, large pulses of fish



have often followed bringing very good fishing during the following days. During the past several years, local/traditional knowledge observations suggest that these pulses of fish have not occurred in the same way. Although research into this topic is warranted, a likely explanation for this change is that boat-based dip netters are catching much of the fish that are resting in these deep pockets.

Long-term subsistence fishing families are not meeting their needs. The Alaska Board of Fisheries' Amount Necessary for Subsistence uses of salmon in the Gakona to Slana and Batzulnetas reach of the Copper River has been met only 2 years during the past 15 years since the ANS was adopted. Similarly, ANS has not been met in 3 of the past 4 years in that reach of the river from the mouth of the Tonsina to the mouth of the Gakona. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success.

The mobility of boat dipnetters gives them a competitive advantage over both fishwheel users and dipnetters who fish from shore. Both fishwheel fishers and onshore dipnetters have reported disruptive encroachment by parties that are dipnetting from boats. Because fishwheels are large and stationary, they have no way of avoiding dipnetters from boats who are inconsiderate and come too close. This can also be an issue for dipnetters who are fishing from shore, as onshore fishing sites are limited in some parts of the river.

Proposal 11 may be an effective compromise that would not ban the practice outright, but could address many of the conservation concerns that accompany it. Under this proposal, dipnetters would still get the benefit of mobility that boats provide, but would be restricted from scooping up fish from the middle of the river.

Dipnetting salmon from boats is not a customary or traditional use of the resource. As such, the state has no imperative to permit it as a method for subsistence fishing. In traditional times, Ahtna fishers dipnetted from shore or from platforms that extended into the river (Simeone and Valentine 2007), but did not dip net from boats floating in the river. Even among non-native settlers, dip netting from boats does not have a long enough history to be considered a customary or traditional use of the resource.

Rather, this is a practice that is very recent. Although this is not, specifically, a difference in the equipment used to harvest salmon, it represents a dramatic change in the way in which the fishery is prosecuted. Using boats to drop people off on shore is different than the practice in which these boat-dipnetters are engaged, which more closely resembles trawling, as defined in 5 AAC 39.105(10): "a net towed through the water to capture fish or shellfish." Dragging nets through the river constitutes a new fishery that does not have a history of customary or traditional use on the Copper River. Boats can confer a competitive advantage over fishers who fish from shore.

The problems with dipnetting from boats are compounded by the lack of adequate enforcement in the fisheries on the upper Copper River. There is very little enforcement on the ground in popular fishing areas, let alone out in more remote reaches of the river that can be easily fished by boats.

The fact that the Fairbanks AC has submitted Proposal 18, which would extend the boundary for the dipnet fishery downriver by ½ mile to address the crowding of boats, indicates that there is a marked increase the prevalence of dipnetting from boats and unsafe crowding issues.

PROPOSAL 10



5 AAC 01.620. Lawful gear and gear specifications; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a boat in the Upper Copper River District, as follows:

Dipnet fishers in the must harvest from shore, from islands in the river, or from stationary objects connected to shore. Dipnet fishing from boats or craft floating in the river is not permitted.

What is the issue you would like the board to address and why? Many Copper Basin residents with intensive local knowledge of salmon ecology have raised concerns about the health of Copper River salmon stocks. The Gulkana Hatchery has not had enough brood-stock to meet its egg-take goals since 2014. Although overall escapement levels have been reasonable in the Copper drainage, very little tributary-by-tributary data are collected. Smaller stocks can easily be damaged by overharvest. Dipnetting from boats in the subsistence fishery raises some particular concerns. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. Fishermen who fish from boats are able to target salmon that are concentrated in these areas. The increased popularity of dipnetting from boats since 2010, combined with the high numbers of fish that each subsistence dipnetter can harvest, could be contributing to the depletion of some smaller stocks.

PROPOSED BY: Ahtna Tene Nene'

Comments:

See comments under Proposal 9.

PROPOSAL 11

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a moving boat in a portion of the Chitina Subdistrict, as follows:

Personal-use fishers who are fishing from boats between the mouths of O'Brien Creek and Haley Creek must be tied off to the riverbank, to an object on the riverbank, or to a stationary object in the river. (This does not apply to charter operators.)

What is the issue you would like the board to address and why? The recent trend of increased dip netting from boats presents some management challenges that demand sensible conservation measures. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. By dip netting from motorized boats, fishermen are able to target these stocks with a precision that other fishers lack. By motoring slowly while dip netting, fishers in boats can "trawl" slowly down the river, running more cubic feet of river water per minute through their nets than their counterparts on shore are able to.

If boat dipnetters were required to tie off to shore, it would help to level the playing field, and decrease some of the pressure on the resource. Fishers with boats would still have the advantage of being able to move around the river, quickly and easily, to different fishing spots.

There have also been some safety concerns about dip netters from boats in the Woods Canyon area. The current in this area is very strong, and there are very few beaches or banks suitable for landing a boat.



PROPOSED BY: Nicole Farnham

Comments:

See comments under Proposal 9.

PROPOSAL 12

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a boat when within 50 feet of a person dipnetting from shore in the Chitina Subdistrict, as follows:

No personal-use fishing from boats is permitted within 50 feet of any personal-use fisher who is standing either on the riverbank, on a rock in the river, or on any permanent, immobile object connected to shore.

What is the issue you would like the board to address and why? With the increasing popularity of dip netting from boats, there have been some issues with user conflicts between dip netters who are using boats and those who are dip netting from the shore in the personal-use area. An increasing number of dip netters who dip net from the riverbanks have expressed concern that fishers in boats have been coming too close for comfort. This can be frustrating and encroach on those without boats, making it more difficult to harvest fish.

In the Woods Canyon area the banks are very steep, and the number of dip net sites is not unlimited. Also, it is much easier for a boat to move up or down the river (avoiding conflict) than for a dip netter on the riverbanks to move to another spot. For a shore dip netter to move, they usually must pack equipment and fish up a steep embankment.

The recent trend of increased dip netting from boats presents some management challenges that demand sensible conservation measures. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. By dip netting from motorized boats, fishermen are able to target these stocks with a precision that other fishers lack. By motoring slowly while dip netting, fishers in boats can "trawl" slowly down the river, running more cubic feet of river water per minute through their nets than their counterparts on shore are able to.

If boat dipnetters were required to tie off to shore, it would help to level the playing field, and mitigate some of the pressure on the resource. Fishers with boats would still have the advantage of being able to move around the river, quickly and easily, to different fishing spots.

There have also been some safety concerns about dip netters from boats in the Woods Canyon area. The current in this area is very strong, and there are very few beaches or banks suitable for landing a boat.

PROPOSED BY: Nicole Farnham

Comments:

We support proposal 12. We have concerns about a trend of increased efficiency of the personal-use fishery resulting from the rising popularity of dipnetting from boats. Adopting this proposal would be a strong step toward reining in a technological innovation that is totally unregulated and growing in an uncontrolled way.

We would prefer that the Board of Fisheries adopt proposal 10, which would ban dipnetting from boats in the upper Copper River district. However, if the BOF declines to adopt proposal 10, we feel that this proposal would partially address the concerns surrounding this practice.



PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit dipnetting from a boat within 75 feet of an operating fish wheel in the Glennallen Subdistrict, as follows:

Subsistence fishing from boats may not occur within 75 feet of any fishwheel in operation.

What is the issue you would like the board to address and why? With the increasing popularity of dip netting from boats, there have been some reports of user conflicts between dip netters and fish wheel operators. A number of fish wheel owners have expressed concern that they have had dip net fishers come too close for comfort. This can encroach on the fish wheel operators' ability to harvest fish. Fish wheels are stationary, so their operators cannot simply go elsewhere to avoid encroachment or conflict. Moreover, there are only a limited number of fish wheel sites on many sections of the river.

PROPOSED BY: Faye Ewan

Comments:

We support proposal 13, to restrict dipnetting from boats adjacent to operating fishwheels. Fishwheels are large, stationary equipment that cannot be easily relocated from one site to another. Fishwheel sites are very limited on the upper Copper River. Boats, on the other hand, are perfectly mobile and can fish on any of the expansive reaches of river where there are no fishwheels. In recent years, fishwheel users in the Glennallen subdistrict have complained about dipnetters in boats encroaching too closely on their fishing sites. This proposal would help to discourage user conflicts and encourage respect for space.

We would prefer that the Board of Fisheries adopt proposal 10, which would ban dipnetting from boats in the upper Copper River district. However, if the BOF will not adopt this proposal, we feel that this proposal would partially address the concerns surrounding this practice.

PROPOSAL 14 5 AAC 01.620. Lawful gear and gear specifications.

Prohibit the use of gillnet mesh in dip nets, as follows:

Dip nets rigged with monofilament and multifilament mesh may not be used before August 15. Before this date only dip nets rigged with branded, inelastic mesh are permitted.

What is the issue you would like the board to address and why? Recent Copper River abundance and escapement estimates have raised concern about the drainage-wide health of Chinook salmon populations. For this reason, fishers have been permitted to keep only 5 Chinook salmon per year. However, the use of dip nets with monofilament or multifilament mesh (i.e. Gill-net material) has raised concern about survival rates of Chinooks that are caught and released. Compared with braided inelastic mesh nets (i.e. seine-style), salmon tend to become far more entangled in monofilament-type nets. It can take as long as ten minutes to untangle and release a salmon from such a net. Salmon experience stress and increased mortality rates in proportion to the length of time they are out of the water. Additionally, these entanglements frequently cause injuries, such as split tail-fins, which further increase their mortality.

PROPOSED BY: Kirk Wilson

Comments:

We support proposal 14, which would ban monofilament-type dipnets between June 1st and August 15th. This impact of monofilament nets on Chinook survival was originally brought to our attention by a guide



on the Copper River who has many years of experience, and extensive local knowledge of dipnet fisheries and their effect on salmon. While Chinook salmon run sizes have fluctuated, they have shown a clear trend of decline during the past 20 years (Savereide et al. 2018). Biologists are investigating the reasons for these declines; multiple factors are likely implicated in these changes, such as changing ocean conditions. Even so, simple in-river conservation measures would help to maximize the survival rates of Chinook salmon during spawning migration, while still maintaining in-river harvest opportunities.

This proposal could reduce mortality among Chinook salmon caught in nets and then released back into the river. These releases occur frequently with Chinook salmon, both when dip net fishers have exceeded their seasonal limits, and when fishers voluntarily release Chinooks due to conservation concerns. Salmon are far more likely to become severely entangled in monofilament/multifilament nets than in nets with inelastic bags. As the same kind of mesh material used in gillnets, monofilament nets are more likely to catch fish on the jaws, gill-plates, fins and other protruding areas of the fish, as well as to stretch and become tightly girdled around their abdomens. These entanglements can cause direct injuries to the salmon (e.g. split tail-fins, broken gill-plates, abrasion), and at the very least, it can make untangling salmon from these nets a far longer and more difficult process, especially for inexperienced fishers. Longer time out of the water leads to increased stress and greater likelihood of mortality. Inelastic-type dip nets, on the other hand, are far more likely to merely enclose the salmon without causing excessive entanglement or injury.

Both dipnets constructed with inelastic seine-style mesh, and the traditional Ahtna style made with inelastic mesh, are effective at catching salmon. Inelastic, seine-style nets are widely available and are no more expensive than monofilament-type nets. This proposal would not reduce opportunity, and would have no effect on the number of Chinook salmon federally-qualified dip net fishers would be allowed to retain each year.

One slight modification to this resolution should be considered: as it is currently worded, this resolution could be interpreted as prohibiting the rigid dipnets that are customary traditional to Ahtna fishers (commonly made of chicken-wire nowadays). Because of their rigidity, these traditional-type nets do not cause entanglement or particular conservation issues. Accordingly, the resolution should contain language specifically allowing these, such as by removing the word “braided” from the proposed regulation:

“You may not use a dipnet that is rigged with monofilament or multifilament mesh before August 15th (when the majority of the Chinook run has passed into the upper Copper River). Before this time, your dipnet must be rigged with ~~braided~~, inelastic mesh.”

PROPOSAL 15

5 AAC 01.620. Lawful gear and gear specifications; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of gillnet mesh in dip nets, as follows:

Eliminate Monofilament/Multifilament/web gill net material on dip nets on the Copper River.

What is the issue you would like the board to address and why? When you catch fish in multifilament dip nets it is really hard to get fish out. When you do finally get fish out of the net if you have a King and



have to release they will probably die when you release. The advantage of monofilament/multifilament nets is that the nets glide in the water easier than other material

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

Comments:

See comments under Proposal 14.

PROPOSAL 16

5 AAC 01.620. Lawful gear and gear specifications; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of depth or fish finders on boats in the Upper Copper River District, as follows:

No electronic devices that indicate bathymetry and/or fish locations are permitted on boats while they are participating in this fishery in the upper Copper River drainage from June 1 to September 30.

What is the issue you would like the board to address and why? The use of electronic devices that indicate bathymetry and/or fish locations (i.e. fish finders) is contributing to unsustainable harvest practices on the upper Copper River. These devices enable fishers to locate and target specific holding areas in the river. Wild stocks are very vulnerable in these areas. These stocks are very time-sensitive and probably travel in small groups and use these areas to hold before continuing upriver. If we do not address this issue, we will continue to see our wild stocks and Gulkana brood-stocks not meet their objectives. The Gulkana Hatchery has not met their brood- stock goals for the past five years, and this is surely also the case for some wild stocks.

PROPOSED BY: Kirk Wilson (EF-F20-014), Copper Basin Fish and Game Advisory Committee

Comments:

We support Proposal 16, which would bans fish finders from boats that are fishing on the Copper River. Obviously, if proposals 9, 10 and/or 11 are approved, this proposal will not be necessary. However if these proposals are voted down, the board should at least ban the use of devices that enable boat-based fishers to target schools of fish. This targeting contributes to the likely overfishing of salmon during high-water events, as mentioned above.

Long-term subsistence fishing families are not meeting their needs. The Alaska Board of Fisheries' Amount Necessary for Subsistence uses of salmon in the Gakona to Slana and Batzulnetas reach of the Copper River has been met only 2 years during the past 15 years since the ANS was adopted. Similarly, ANS has not been met in 3 of the past 4 years in that reach of the river from the mouth of the Tonsina to the mouth of the Gakona. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success in harvesting salmon.

Fish finders are a technology that is in no way customary or traditional to the subsistence fishery on the upper Copper River. Restricting fish-finders would most likely have little impact on experienced fishers, who usually already know where the find schools of fish on the Copper River. It would, however, encourage inexperienced fishers to develop the knowledge and experience that are critically important for fishing on a swift, dangerous river such as the Copper. Fish-finders are not necessary as a safety



device on the Copper River, as the river is too swift and silty for them to be effective. In fact, their use promotes more dangerous boating behaviors, as fishers who use fish-finders tend to look down at these devices when they should be actively trying to read the river.

If there are concerns about safety, this proposal could be modified to allow transducer devices (which detect river depth and show fish) cannot be deployed from, or attached to, a boat, but that GPS chart-plotter units may be used for navigation (for example, to show navigable channels in braided reaches of river). Such language should indicate that GPS chart-plotter units are not to be used while people on a boat are actively fishing.

PROPOSAL 17

5 AAC 01.645. Subsistence bag, possession, and size limits; annual limits.

Establish specific permit and bag limits when dipnetting from a boat in the Glennallen Subdistrict, as follows:

If using a standard subsistence permit, dipnet fishers in the Glennallen subdistrict must harvest from shore, from islands in the river, or from stationary objects connected to shore. Upon request, subsistence fishers may obtain a supplemental permit to dipnet harvest salmon from boats, with the following limits applying to boat-caught salmon:

- (A) no more than a total of 30 salmon for a permit issued to a household with one person, of which no more than five may be king salmon;
- (B) no more than a total of 60 salmon for a permit issued to a household with two or more persons, of which no more than five may be king salmon.

What is the issue you would like the board to address and why? Many Copper Basin residents with intensive local knowledge of salmon ecology have raised concerns about the health of Copper River salmon stocks. The Gulkana Hatchery has not had enough brood-stock to meet its egg-take goals since 2014. Although overall escapement levels have been reasonable in the Copper drainage, very little tributary-by-tributary data are collected. Smaller stocks can easily be damaged by overharvest.

Dipnetting from boats in the subsistence fishery raises some particular concerns. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. Fishermen who fish from boats are able to target salmon that are concentrated in these areas. The increased popularity of dipnetting from boats since 2010, combined with the high numbers of fish that each subsistence dipnetter can harvest, could be contributing to the depletion of some smaller stocks.

PROPOSED BY: Faye Ewan

Comments:

We support Proposal 17. We are concerned about the increased numbers of subsistence permittees fishing under state subsistence permits. These users are increasingly using boats to harvest salmon, and we cannot yet fully evaluate the impact of this on stock diversity, given that dipnetting has customarily and traditionally been conducted from shore and has almost exclusively harvested bank-oriented salmon. Accordingly, we support this proposal for precautionary reasons—it would still allow all dipnetters the opportunity to harvest significant numbers of salmon, but would help to ensure that smaller, sensitive stocks are not overfished as a result of the increasing popularity of dipnetting from boats.



PROPOSAL 18

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Extend the lower boundary of the Chitina Subdistrict downstream ½ mile, as follows:

Currently in regulation 5 AAC 77.591(h), the Chitina Personal Use Dipnet Fishery (CPUDF) boundary consists of all mainstream waters of the Copper River from the downstream edge of the Chitina McCarthy Bridge downstream to an east west line crossing the Copper River approximately 200 yards upstream of Haley Creek.

Our proposed remedy for the hazard of so many boats fishing in a small area is for the BOF to approve extending the CPUDF lower boundary approximately ½ mile downstream from the existing CPUDF lower boundary. This would allow boat dipnetters a longer continuous drift, allowing more spacing between boats, and alleviate the dangerous congestion of boats that occurs now.

New wordage in 5 AAC 77.591(h) would read **“For the purposes of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina-McCarthy Bridge downstream to a line crossing the Copper River from a point just downstream of Canyon Creek on the east (lat. 61 deg. 24'30.00”N -- lon. 144 deg. 28'39.00”W) to a point directly across the Copper River on the west (lat. 61 deg. 24'37.00”N—lon. 144 deg. 29'3.00”W)**

This small increase in size of the Chitina Sub-district is unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan.

The Chitina Dipnetters Association in its public comments will include a map identifying the existing and proposed lower boundaries.

What is the issue you would like the board to address and why? In the last 10 years, drift dipnetting from personal boats has substantially increased as a method of harvesting salmon in the CPUDF. This is in large part due to the very limited number of suitable sites available for shore based dipnetting. Because much of the CPUDF lies within the deep turbulent waters of Woods Canyon on the Copper River, productive areas to dip from boats are very limited. A favorable and high use area for drift dipnetting from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the lower boundary of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with up to and over 15 boats drifting the same area. This congestion of boats has created a very dangerous navigation hazard for these boaters within the swift waters of the Copper River.

PROPOSED BY: The Chitina Dipnetters Association and Fairbanks Fish and Game Advisory Committee

Comments:

We strongly oppose proposal 18, proposed by the Chitina Dipnetters’ Association (CDA) and the Fairbanks Fish and Game Advisory Committee (Fairbanks AC), which would extend the area for personal-use dipnetting downriver by one-half mile.



Given the abysmally low sockeye returns of 2018 and 2020, this is an inopportune time to extend harvest opportunity in the Chitina Dipnet Personal Use Fishery (CPUDF). Proposal 18 correctly points out that “drift dipnetting from personal boats has substantially increased as a method of harvest in the CPUDF.” The proposal attributes this increase to the fact that there is a limited number of suitable sites for shore-based dipnetting, and similarly points out that personal-use fishers who dipnet from boats are constrained to very small “productive areas”—primarily between the mouth of Wood Canyon and the regulatory marker at Hailey Creek.

All of these assertions highlight the fact that there is crowding at personal-use dipnet sites, one indicator of the immense pressure on the resource, which is constantly increasing with the growing participation of urban users. While extending the regulatory boundary one-half mile downriver may provide some temporary relief from this congestion, over the long term we can expect it will only attract more dipnetters. It is likely that the expanded area would eventually become just as crowded as the current downstream end of the fishery is. If this happens, would it be unreasonable to imagine that the CDA might again complain about the crowding, and again ask the BOF to extend the boundary even further downriver? They have already tried to do this in 2017, with proposal 17, which would have extended the lower boundary of the personal-use fishery down to the mouth of the Umanatna River.

The proposal claims that this change would be “unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan.” However, the lack of in-season harvest data and minimal coverage by weirs and counting towers in the Copper drainage means that managers rely on general estimates—based largely on multi-year patterns—to infer the harvest efficacy of the personal-use fishery at given points during the fishing season. Managers do not obtain precise estimates of how many salmon have been harvested until many months after the end of the fishing season. Because of this, closures provide only a very coarse way of controlling harvest levels in the upriver fisheries. This proposal is clearly an attempt to extend opportunity. Most likely, this will result in increased fishing effort, which will result in some additional harvest. While this additional harvest would likely be fairly modest, during years of low abundance it could be a significant factor in eventual escapement estimates, or in the number of fish available for the subsistence users upriver. Indirectly, creating further opportunities for the personal-use dipnet fishery may result in further restrictions on the commercial fishery, which has suffered the most onerous closures during recent years of scarcity.

While ADF&G’s data indicated a healthy total sockeye run size between 2007 and 2016 (Botz and Somerville 2017), the exceedingly poor runs of 2018 and 2020 are troubling. The last time the Copper has seen sockeye runs this weak was nearly four decades ago, in 1980 – 81 (Simeone and Valentine 2007). Because it is too soon to say for certain whether 2018 and 2020 are an aberration or the beginning of a longer-term pattern, it only makes sense to use the precautionary principle, and to be conservative in enacting new regulations. If the past three years have been a blip, and salmon runs are exceedingly strong in the coming years, perhaps CDA and the Fairbanks AC will have a stronger case when they resubmit this proposal in 2023.

Even if future sockeye returns are strong, however, Chinook salmon have shown definitive patterns of decline during the past decade. Every effort should be taken to conserve Chinook stocks and prevent them from further declining. Although total annual Chinook retention reported in the personal-use fishery has been relatively small (generally in the range of 1,000 – 3,000 per year, according to information on the ADF&G website), dipnetting mortality due to catch-and-release is poorly understood, and is undoubtedly significant. Because this proposal is likely to increase fishing effort in an area where



Chinook salmon migrate, it is likely to increase Chinook mortality. The likely creation of a new federal subsistence fishery in the lower Copper River flats will compound this effect. Because Copper River salmon management focuses on sockeye, it may not be as responsive to further signs of trouble in Chinook and other species.

Changes in fishing access are likely to further strain the resource. The Alaska Department of Transportation recently improved the road from O'Brien Creek to Haley Creek. This will make motorized access by dipnetters far quicker and easier along this reach of river. Despite the limited number of onshore sites pointed out in this proposal, we expect that the improved road will already significantly increase fishing effort during the course of the season.

On the heels of a few years of alarmingly low salmon returns, the Board of Fisheries must avoid catering to the convenience of a well-equipped special-interest group that already has many options available to obtain fish.

The area below the current lower boundary of the personal-use fishery is one of the most dangerous parts of the Copper River, particularly during high water. There is a large whirlpool immediately below the current regulatory boundary that presents a significant hazard for boaters, especially those with smaller boats and motors.

Finally, and most importantly, Haley Creek is the lower boundary of the upper Copper River District. It is possible that extending the boundary downriver, below the current regulatory marker, would effectively create a new fishery in the Lower Copper River District. This would potentially open the floodgates to further expansion of the personal-use fishery into lower reaches of the river--a serious conservation concern given the current state of salmon stocks.

PROPOSAL 19

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Reduce the maximum harvest level in the Chitina Subdistrict Personal Use Fishery when the Copper River commercial fishery harvest is 50% below the 10-year average on June 1, as follows:

Amend the Copper River Personal Use Dipnet Salmon Fishery Management Plan to factor in the effect of a below-average run on projected in-river numbers and availability for harvest by the personal use fishery.

Add a new section under 5 AAC 77.591 to read:

If the Copper River District commercial harvest is 50% below the 10 year average by June 1 the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

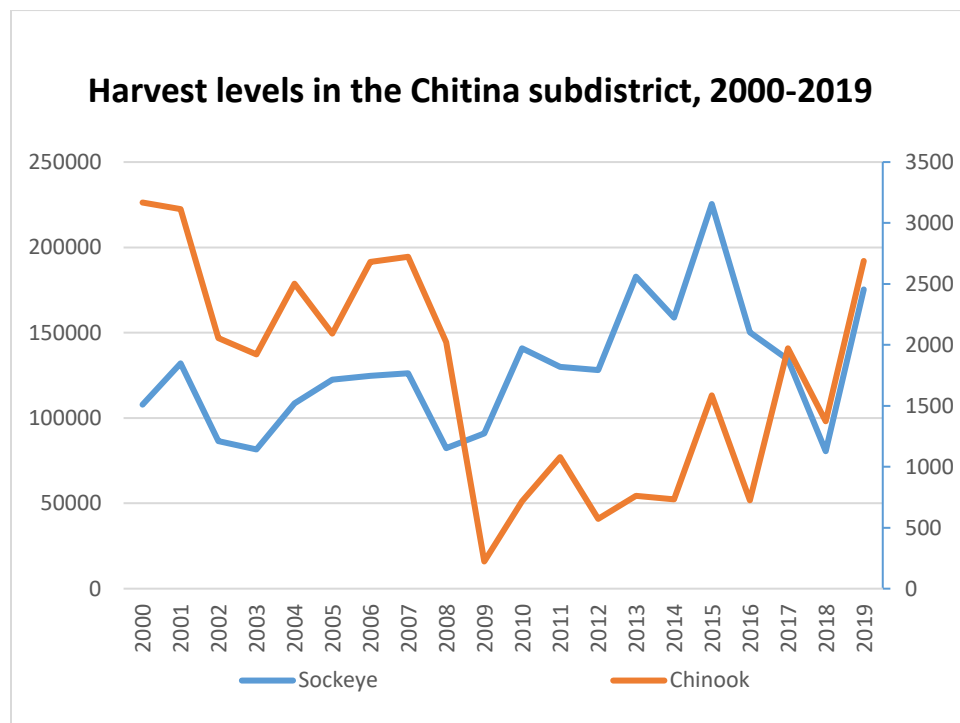
What is the issue you would like the board to address and why? In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not. In an effort for this burden of conservation to be shared amongst all user groups, we propose adopting a triggered regulation for conservation purposes.

PROPOSED BY: Cordova District Fishermen United



Comments:

We support Proposal 19 to reduce Personal Use Fisheries by 50,000 if the commercial harvest is 50% below the 10 year average by June 1st. Since 2009, average harvest levels in the Chitina subdistrict—of which the personal-use dipnet fishery accounts for the vast majority—show clear trends of increase for both Chinook and sockeye (see graph below; Somerville and Hansen 2021, table 9). The average harvest of sockeye from 2009 – 2018 was 140,340, and the 2014 – 2018 average harvest of sockeye was 147,804. For Chinook salmon, these trends of increase are even more pronounced. The average king salmon harvest from 2009 – 2018 was 953 kings, compared to the more recent 2014 – 2018 average of 1,247 (Somerville and Hansen 2021, table 7).



There are significant questions about the efficacy of current inriver management. As noted in previous comments, ADF&G bases its escapement estimates on inriver abundance at the Miles Lake sonar counter, extrapolating inriver harvest/mortality based on previous years' fishing patterns, etc. Both sockeye and Chinook salmon have seen marked declines in recent years. While the causes of this are not definitively known, inriver conservation measures could certainly benefit the situation. During years when the commercial fishery is suffering severe closures, these kind of conservation measures would seem similarly warranted in the upriver fisheries, even if their harvest levels are much smaller.

If commercial fishing is restricted, other fisheries should also be restricted in order to ensure sufficient reasonable opportunities for harvest in other portions of the river—particularly for the subsistence fisheries, which are the furthest upriver, and have management priority over other fisheries. This proposal will help to ensure that priority customary and traditional uses are protected.

PROPOSAL 20

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Amend the annual limit for salmon in the Chitina Subdistrict, as follows:



The total annual limit for each personal use salmon fishing permit is 15 for a household of one and 30 for a household of more than one.

Supplemental permits for 10 additional sockeye shall be available when ADFG determines that a weekly harvestable surplus of 50,000 salmon or greater will be present in the Chitina Subdistrict. An additional supplemental permit may be issued to a permittee who has met the limits of a previously issued supplemental permit.

What is the issue you would like the board to address and why? In 2014, the Board of Fish (BOF) increased the limits for the Chitina Personal-use (PU) dipnet fishery. It is now 25 sockeye for a head of household and 10 additional for each additional member. Previously, the limit was 15 sockeye for a household of one and 30 for a household of more than one, with the possibility for the Alaska Department of Fish & Game (ADF&G) to permit an additional 10 sockeye per household when there was a weekly surplus of 50,000 or more.

The previous limits were more conservative, as well as more adaptive to the in-season realities of salmon abundance. Several signs indicate that the sockeye fishery on the Copper River is currently experiencing strain. In 2018, the fishery was unable to meet its sockeye escapement goals, even after commercial fisheries remained closed for almost the entire season. For the past five years, the Gulkana hatchery has been unable to obtain sufficient brood-stock to meet its egg-take goals. A return to these previous limits would help to address these issues.

At the time this regulatory change was adopted, the justification given was that it would standardize regulations, bringing the Chitina PU fishery into line with the limits of the Kenai PU fishery. However, the Copper and Kenai are two very different river systems, with different ecological characteristics as well as different patterns of fisheries participation.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 20 to adjust Personal Use Fisheries annual limit fishing permit to 15 for a household of one and 30 for a household of more than one with supplemental permits for 10 additional sockeyes when ADF&G determines that there is weekly harvestable surplus of 50,000 salmon or greater in the Chitina Subdistrict. As the proposer mentions, this was the limit for personal-use harvest until 2014.

As noted in the comments on proposal 19, fishing activity in the Chitina personal-use dipnet fishery has shown a general pattern of increase during the past twelve years, both in terms of the number of permits fished, and in terms of the numbers of sockeye and Chinook harvested. Recent years have seen a series of very weak sockeye and Chinook runs, however. In order to accommodate the realities of increasing numbers of people using the resource, combined with declining salmon runs, harvest limits should be adjusted downward.

PROPOSAL 21

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Amend the opening date of the Chitina Subdistrict personal use fishery from June 7 to June 1, as follows:

Change June 7 personal use season opener to June 1.



What is the issue you would like the board to address and why? The June 7 start date was enacted many years ago as part of an effort for every user group to bear a perceived King salmon conservation burden, but because the personal use (PU) fishery is set by sonar numbers, and because some years there are strong early runs, and King has been generally restricted from PU harvest in recent years, the rationale no longer applies. The department can still push back the opener for biological reasons. It would not result in increased allocation, just an early start if conditions dictate.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

We strongly oppose Proposal 21, which would change the Chitina Subdistrict Personal Use fishing season start date from June 7 to June 1. Given the low sockeye and Chinook returns discussed above, this is no time to liberalize regulations on any fishery. In the past, the personal-use dipnet fishery used to open on June 1st, but the Board of Fisheries changed this date because it compelled conservation during the early season, when limited data are available.

Last season saw the implementation of severe Chinook restrictions, with Chinook retention closed in all state fisheries (Mark Somerville, “Copper River Management Update July 21”). Additionally, the opening of the personal-use fishery was delayed by a week due to low early sockeye returns.

Given low returns of sockeye and Chinook salmon, now is not the time to increase number of fishing days for the Personal Use fishery. Sockeye escapement goals may have been met in recent years, but run sizes have been very small and escapement has been at the lower end of the range. The escapement goal for Chinook salmon has not been met in recent years.

It is interesting that there are currently no proposals before the BOF that seek to liberalize salmon harvest regulations in the upper Copper River sport and/or subsistence fisheries. Most upper Copper River fisheries stakeholders seem to recognize the need for conservation at this time. Yet personal-use dipnetters—predominantly non-local urban Alaskans—exempt themselves from these concerns by seeking expanded harvest opportunity via both proposal 18 and this current proposal.

Instead of starting on June 1st or 7th, the start date for the personal-use fishery should be June 14th, to ensure that there is adequate opportunity for early-season escapement before intensive personal-use fishing begins.

PROPOSAL 22

5 AAC 01.616. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses.

Reverse the positive customary and traditional subsistence use determination for freshwater finfish within the Chitina Subdistrict, as follows:

Subsistence C&T findings within the Chitina subdistrict. Other freshwater finfish, negative.

What is the issue you would like the board to address and why? We are asking that you remove the positive finding of C&T on freshwater finfish other than salmon within the Chitina Subdistrict (PU fishery). The BOF has found a negative finding of C&T on all salmon within the Chitina subdistrict, but never addressed the other freshwater finfish. If salmon (the most desirable and sought fish to fulfill



subsistence needs) cannot meet the eight criteria for C&T in the Chitina subdistrict then how can other freshwater finfish within the Chitina subdistrict have a positive finding? Other freshwater finfish in the Chitina subdistrict do not meet the eight criteria for a positive finding of C&T.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

We do not support Proposal 22. In December 2008, the Alaska Board of Fisheries determined that nonsalmon finfish species are associated with customary and traditional (C&T) uses in the upper Copper and upper Susitna rivers. In order to reverse a C&T determination, there needs to be new significant information. This proposal includes no new information indicating that patterns of use of nonsalmon fish have changed significantly since 2008. Nonsalmon finfish continue to be an important customary & traditional resource utilized by Copper Basin residents, as demonstrated in comprehensive subsistence research conducted by ADF&G since 2008.

Upper Copper River Personal Use and Subsistence

PROPOSAL 23

5 AAC 01.610. Fishing seasons; 5 AAC 01.616. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses; and 5 AAC 01.645. Subsistence bag, possession, and size limits; annual limits. Reverse the positive customary and traditional subsistence use determination for rainbow and steelhead trout in the Prince William Sound Area, or establish amounts reasonably necessary for subsistence and bag and possession limits for rainbow and steelhead trout in the Prince William Sound Area, as follows:

Modify regulations to make rainbow trout and steelhead negative for C&T, or identify stocks and create harvest opportunity to meet the lowest amount determined reasonably necessary to meet the positive C&T. Currently, the amount necessary for all finfish other than salmon is 25,000 – 42,000.

What is the issue you would like the board to address and why? Rainbow trout and steelhead have a positive C&T, but retention is not allowed except as incidental fishwheel catch.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

We do not support Proposal 23. In December 2008, the Alaska Board of Fisheries determined that nonsalmon finfish species are associated with customary and traditional (C&T) uses in the upper Copper and upper Susitna rivers. In order to reverse a C&T determination, there needs to be new significant information. This proposal includes no new information indicating that patterns of use of nonsalmon fish have changed significantly since 2008. Nonsalmon finfish continue to be an important customary & traditional resource utilized by the Ahtna people, as demonstrated in comprehensive subsistence research conducted by ADF&G since 2008.

PROPOSAL 28

5 AAC 01.645. Subsistence bag, possession, and size limits; annual limits. Amend household harvest limits for subsistence-caught salmon, as follows:

We recommend increasing the limits of drift gillnet users to 30 salmon for a household of one, 60 salmon for a household of two, and ten additional salmon for each additional member of the household. We further seek to allow the harvest of up to 500 salmon by request, however we wish to limit these additional salmon to pink salmon and chum salmon.



What is the issue you would like the board to address and why? Subsistence salmon harvest limits in the Copper River District subsistence fishery are half that of those harvesting the same salmon stocks in the Glennallen Subdistrict subsistence fishery. A further disparity exists in the ability of Glennallen Subdistrict subsistence users to request a harvest limit increase of up to 500 salmon per household. We seek parity between the limits in these two fisheries, but we do not wish to reduce any harvest limits upriver.

PROPOSED BY: Native Village of Eyak

Comments:

We oppose Proposal 28 as written to amend harvest limits for subsistence-caught salmon to 30 for a household of one, 60 for a household of two, and ten additional salmon for each additional household member. However, we support the supplemental limit of pink and chum, equal to the household limit of salmon.

Increasing harvest limits for all salmon species in the Copper River District will most certainly negatively affect the Upper Copper River District. Escapement goals for King Salmon have repeatedly not been met in recent years. Escapement returns for Sockeyes are at the lower end of the spectrum. Brood stock returns to Gulkana Hatchery are extremely low too. Conservation measures must be taken to conserve salmon in the Copper River rather than allowing more harvest for all user groups.

Additionally, both sockeye and Chinook are undergoing well-documented declines in their overall size. Smaller salmon tend to be less fecund—as a result, more escapement is needed in order to produce comparable returns.

PROPOSAL 29

5 AAC 01.620. Lawful gear and gear specifications.

Allow use of drift gillnets to harvest salmon for subsistence uses throughout Prince William Sound, as follows:

We seek to allow subsistence salmon fishing using drift gillnet gear throughout Prince William Sound concurrent with commercial fishing openers and on Saturdays from 6am until 10pm.

What is the issue you would like the board to address and why? The Prince William Sound legal subsistence gear type is tied to the legal commercial gear type in each fishing district. This gear type seems unnecessarily restrictive when you consider that the household harvest potential is already capped through maximum catch. Most subsistence users in PWS utilize gillnets and don't have the option to utilize seine gear in districts where seine is the legal commercial gear type. We would like subsistence users to be allowed access to the entire Prince William Sound with gillnet gear to support subsistence opportunity in areas where a harvestable surplus is available and underutilized by subsistence users.

PROPOSED BY: Native Village of Eyak

Comments:

No comment.

Prince William Sound and Upper Copper and Susitna Rivers Sport



PROPOSAL 30

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Extend single-hook, artificial fly regulations in the Gulkana River to include the area under the Richardson Highway Bridge, as follows:

5 AAC 52.023 (9) is amended to read:

- (A) from June 1 – July 31, only single-hook, artificial flies, with a gap that does not exceed three-quarters inch between the point and shank, may be used in that portion of the Gulkana River downstream **of** [FROM] the **upstream edge of the** Richardson Highway Bridge to an ADF&G regulatory marker located approximately 500 yards downstream of the confluence with the Copper River; additional weight may only be used 18 inches or more ahead of the fly;

...

What is the issue you would like the board to address and why? A section of the Gulkana River downstream of the Richardson Highway Bridge allows for only single-hook, artificial flies to be used from June 1–July 31, while a section of the river upstream of the Richardson Highway Bridge allows for bait and artificial lures (including treble hooks) to be used from June 1–July

19. As written, the area under the bridge would fall under general area regulations (i.e., unbaited, single-hook, artificial lures) because it is neither upstream nor downstream of the bridge. Adding the language to include the area under the bridge in the artificial fly only area would reduce regulatory complexity and uncertainty on methods and means restrictions while fishing on the Gulkana River, specifically near the bridge, which is a popular fishing location.

PROPOSED BY: Alaska Department of Fish and Game

Comments:

We support Proposal 30 to extend single-hook, artificial fly regulations in the Gulkana River to include the area under the Richardson Highway Bridge. It seems to be a housekeeping proposal that was inadvertently left out of regulation.

PROPOSAL 31

5 AAC 52.022. General provisions for season, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Increase the possession limit for sockeye salmon in the Upper Copper River, as follows:

In the upper Copper River, the sport Sockeye limit is three per day, three in possession. Elsewhere, like the Kenai, the possession limit is two daily bag limits. Especially in years with King restrictions, a Sockeye angler should be able to retain two daily bag limits, especially in areas like this where most anglers drive long distances or take multi-day float trips and would like to retain two daily bag limits without having to freeze the first day's limit.

What is the issue you would like the board to address and why? Align Sockeye possession limits with similar regions.



deep or good on gill then they will die anyways. Keeping 1 rainbow/steelhead, especially one hooked badly will not hurt the population as they would die anyways. We also feel this will allow for more salmon eggs which will be good for the salmon populations.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

Comments:

We do not support Proposal 32. We do not support sport-fish retention of trout until the population can withstand it because we do not want to lose subsistence harvest opportunities for trout. If sport fishers retain too many trout from the Gulkana River drainage, it is possible that incidental retention of rainbow/steelhead trout by fishwheel users may be restricted.

PROPOSAL 33

5 AAC 52.023. Special provisions for season, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Allow harvest of rainbow trout 18 inches or less in the Gulkana River, as follows:

There are approximately 13,000 rainbow trout in the Gulkana with 7,000 greater than 18 inches. Allow anglers to retain 1 rainbow trout under 18 inches. If not on the entire Gulkana, then at least above the “No bait” marker on the mainstem above the West Fork confluence, an area of high abundance usually only accessible by floaters, who should have the opportunity to eat a normally hooked rainbow trout instead of releasing it dead or dying.

What is the issue you would like the board to address and why? Inability to retain any Rainbow Trout in the Gulkana River, even those fish caught on King gear that have died, or will likely die, upon release.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

See comments under Proposal 32

PROPOSAL 34

5 AAC 52.023. Special Provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Remove the 14-inch size limit for Gulkana River Arctic grayling, as follows: 5 AAC 52.023 is amended to read:

(9) (C) in waters upstream of Paxson Lake and those waters of Paxson Lake within a 100-yard radius of the mouth of the East Fork at the north end of Paxson Lake upstream to Summit Lake,

(iii) the bag and possession limit for Arctic grayling is two fish, with no size limit[OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH];

(D) in all flowing waters from 100 yards upstream from the narrows at the Paxson Lake outlet downstream to the confluence with the Middle Fork;

(iii) [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, WITH NO SIZE LIMIT OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]



(A) in all waters of the Middle Fork of the Gulkana River from the outlet of Dickey Lake to an ADF&G regulatory marker located approximately three miles downstream, including Hungry Hollow Creek and Twelvemile Creek,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, WITH NO SIZE LIMIT OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(B) in all other waters of the Middle Fork of the Gulkana River not specified in (E) of this section,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, WITH NO SIZE LIMIT OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(C) all waters downstream of the confluence of the Middle Fork,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(D) in all flowing waters of the West Fork of the Gulkana River upstream of an ADF&G regulatory marker located one-half mile upstream of the confluence of the West Fork and mainstem of the Gulkana River,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(18) in Paxson Lake,

[(E) THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH WITH NO SIZE LIMIT, OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(20) in the Summit Lake drainage,

(F) the bag and possession limit for Arctic grayling is two fish, **with no size limit**[OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH];

...

What is the issue you would like the board to address and why? Based on a study of Gulkana River Arctic grayling, a one fish over 14-inch size restriction was imposed in 1989 to preserve the size structure of the Arctic grayling populations in that system. Subsequent assessments have been conducted since that time, including a comprehensive study completed in 2019. Based on these studies and recent harvest trends, it was determined that the 14-inch restriction is no longer needed to maintain the desired population size and structure.

PROPOSED BY: Alaska Department of Fish and Game

Comments:

We support Proposal 34 to remove the 14-inch size limit for Gulkana River Arctic grayling. Restriction on size is no longer needed in the Gulkana River system as long as sportsmen keep grayling and do not release it back into the water.



PROPOSAL 35

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Amend bag and possession limits for Arctic grayling and methods and means in Moose Creek, as follows:

Moose creek: sport anglers may use baited or unbaited single hook artificial lures. Bag limit is 2 and 2 in possession. Season is open year round. Only catch and release fishing is allowed from April 1 to May 31.

What is the issue you would like the board to address and why? Fishing regulations for Moose Creek in the Copper River Basin do not provide for the protection of the Grayling spawning run. What was once a plentiful fishery has noticeably declined. Along with that loss, is the loss of the symbiotic relationships between Grayling and Mink/Otter, King Fisher, Seagulls and Eagles that has altered where this wildlife is no longer seen hunting the creek. Sport fishing in Moose Creek by youth and adult is now seldom participated in.

Adequate management of this fishery includes (1) Creation and implementation of fishing regulations for Grayling that protect the spawning run and provide for healthy future populations of Grayling in Moose Creek in the Copper River Basin. And, (2) Restoration or reintroduction of Grayling in Moose Creek, in the Copper River Basin, allowing for recreational fishing and the return of the symbiotic relationship between Grayling and other wildlife.

PROPOSED BY: Bonnie McLeod

Comments:

We oppose Proposal 35 to amend bag and possession for Arctic grayling and methods and means in Moose Creek in the Copper River Basin. We do not support catch and release of graylings from April 1 to May 31st or at any other time.

Additionally, the culverts that were installed a few years ago has allowed fish passage more readily. Graylings are not holding up near the older, smaller culvert as they used to. It was the culvert that allowed more graylings to linger in one spot, which made it appear that there more graylings than there actually were.

PROPOSAL 36

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Increase the bag and possession limit of lake trout in Crosswind Lake, as follows: 3 lake trout one over 30" per year in Crosswinds Lake

What is the issue you would like the board to address and why? Overabundance of lake trout in Crosswinds Lake. PWSA has been planting up to 10 million sockeye salmon smelt each year over 20 years. This has increased the trout population 10-fold & in some cases the big fish are starting to get skinny. Small fish are taking over lake. There May need to be more liberal limits in the future or big fish will start to diminish due to competition from small fish. This number of trout is starting to diminish the smelt fry to the point the Gulkana Hatchery can't meet their egg take goals since 2015. If the stocking doesn't keep smelt coming at a regular rate you will see skinny lake trout in all size ranges & big fish



could starve out. It only makes good since to let fishers take more fish when there is so many fish available. This regulation will promote a healthy sport fishery.
Due to cost of flying there are less and less fishermen participating in this fishery.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 36 to increase the bag limit and possession limit of Lake Trout in Crosswind Lake to 3 Lake Trout over 30" per year. It appears that small fish are overeating food sources in Crosswind Lake, larger Lake Trout may not be able to eat to stay healthy.

Commercial Finfish

Copper River King Salmon Management Plan

PROPOSAL 41

5 AAC 24.361. Copper River King Salmon Management Plan. Repeal mandatory closed waters from the Copper River King Salmon Management Plan, as follows:

Repeal mandatory inside commercial closures for any statistical week from regulation. Repeal mandatory commercial salmon fishery inside waters closures in the Copper River King Salmon Management Plan, as follows: Draft regulatory language: 5 AAC 24.361. Copper River King Salmon Management Plan.

(b) **Repealed xx/xx/20.** [IN THE COMMERCIAL FISHERY, DURING THE STATISTICAL WEEKS 20 AND 21, THE COMMISSIONER MAY NOT OPEN MORE THAN ONE 12-HOUR FISHING PERIOD WITHIN THE INSIDE CLOSURE AREA OF THE COPPER RIVER DISTRICT DESCRIBED IN 5 AAC 24.350(1)(B).]

What is the issue you would like the board to address and why? Alaska Department of Fish and Game (ADFG) has the authority to manage fisheries and has demonstrated its ability to do so effectively; therefore, mandatory closures are unnecessary. There has been an upward trend in the Copper River Chinook run in recent years further making mandatory closures unnecessary. ADFG has opposed mandatory closures on sport fisheries as these closures are mandated even when the circumstances of a current year's run strength and timing do not require them. This proposal does not suggest eliminating the inside closure tool as it is warranted, but rather suggests the elimination of this mandatory language.

PROPOSED BY: Cordova District Fishermen United

Comments:

We strongly oppose Propose 41 to repeal mandatory inside commercial closures for any statistical week from regulation. In 2020 King Salmon escapement goal was not met, and in 2020 sockeye escapement goal was barely met. Now is not the time to repeal mandatory closures.

The Chinook salmon conservation measure that the proposers are seeking to repeal has only been in place since 2011. Given the stark declines in Chinook returns during the past decade, this is an inappropriate time to repeal this conservation measure.

Sockeyes should be considered a Stock of Concern by the Alaska Board of Fisheries. Less wild stock- (sockeyes) and enhanced Gulkana hatchery fish are returning to spawn each year. In 2020 503,000 sockeyes returned and 22,000 King Salmon returned to spawn.



**STATEWIDE ALL SHELLFISH (EXCEPT PRINCE WILLIAM SOUND, SOUTHEAST AND YAKUTAT) AND
PRINCE WILLIAM SOUND SHRIMP ONLY**

42 proposals

Miscellaneous sport

PROPOSAL 234

5 AAC 75.XXX. New Section.

Require inseason reporting of non-resident sport fish harvest and effort, as follows:

All non-resident sport fisherman must keep track of a catch and harvest record of all species finfish and shellfish regardless of annual limit status of the species.

What is the issue you would like the board to address and why? The Ketchikan Indian Community Tribal Government believes nonresident sport fishermen and their fishing activities are severely data deficient, which has a negative impact on the management of all fisheries in the state of Alaska. It is imperative for these fishermen to report their catch and harvest so that management of our fisheries can use them for future population estimates of the fish abundance and distribution.

PROPOSED BY: Ketchikan Indian Community

Comments:

We support Proposal 234 to require sports fishermen to report catch of fish in Alaska. All of the other users have to report, sports fisheries are not required to do so. Valuable fisheries information could be applied by fisheries biologist if they had real-time information on harvest of salmon caught.

PROPOSAL 23

5 AAC 39.975. Definitions; and 5 AAC 75.995. Definitions.

Modify the definition of domicile and include in sport fishing regulations, as follows:

“**domicile**” means the location of a person’s primary residence which allows the person to meet the eligibility requirements for the Alaska Permanent Fund Dividend as defined in AS 43.23.005 (a)(1-7); evidence of domicile includes:

- (C) a statement made to obtain a license to drive, hunt, fish, or engage in an activity regulated by a government entity;
- (D) an affidavit of the person, or of another person who may know of that person’s domicile;
- (E) the place of voter registration
- (F) the location of a residence owned, rented, or leased;
- (G) the location where household goods are stored;
- (H) the location of a business owned or operated;
- (I) the residence of a spouse or minor children or dependents;
- (J) a government to which a tax is paid;



(K) evidence indicating whether the person has a claimed residence in another location for the purpose of obtaining benefits provided by the government in that location;”

AS 43.23.005. Eligibility.

(L) An individual is eligible to receive one permanent fund dividend each year in an amount to be determined under AS 43.23.025 if the individual

- applies to the department;
- is a state resident on the date of application;
- was a state resident during the entire qualifying year;
- has been physically present in the state for at least 72 consecutive hours at some time during the prior two years before the current dividend year;
- is

(A) a citizen of the United States;

(B) an alien lawfully admitted for permanent residence in the United States;

(C) an alien with refugee status under federal law; or

(D) an alien that has been granted asylum under federal law;

(6) was, at all times during the qualifying year, physically present in the state or, if absent, was absent only as allowed in AS 43.23.008; and

(7) was in compliance during the qualifying year with the military selective service registration requirements imposed under 50 U.S.C. App. 453 (Military Selective Service Act), if those requirements were applicable to the individual, or has come into compliance after being notified of the lack of compliance.

What is the issue you would like the board to address and why? Alaska has an increasing population of seasonal residents who come to Alaska only during the fishing season or hunting seasons to take advantage of the resources of Alaska. They reside most of the year in another state. Many of these seasonal residents have never been domiciled in Alaska for 12 consecutive months. Some tow or drive an RV to Alaska and lease an area to park their RV on during their temporary stay in Alaska. Some have family and spouses who do not travel with them to Alaska during their visit.

The issue is some of these visitors to Alaska are obtaining Alaska resident hunting and fishing licenses and benefits. They are obtaining an Alaska driver's license and registering to vote in Alaska. They are registering their vehicles in Alaska which has some of the lowest vehicle registration fees in the USA. If they are claiming a resident of a qualified area of the state, they are also permanently registering their vehicle in Alaska and never have to pay a registration fee on that vehicle again.

In past practices of the Alaska Court System, if the person is charged with a false statement on a ADF&G resident license permit, the definition of domicile continually keeps being the deciding factor in court decisions. A person may leave suitcases in a room of a house in Alaska. The court system has determined that this is the start of a person's domicile and after 12 consecutive months, they are eligible for an ADF&G resident license or permit. If a person maintains a yearly space rent at an RV park, that space rent qualifies as a person's domicile. The Alaska Court System does not consider paying resident taxes in another state as a benefit.

So in short reference, a resident of the lower 48 can take vacation time from their job. They can tow their RV to Alaska to their RV park which they have a year lease on a space. They can hunt, sport fish, and subsistence fish for a short time as an Alaska resident. They then can return back to their year round



residence with freezers full of Alaskan salmon, halibut, and moose meat to their spouse and family in the lower 48. They do intend to visit their year round leased RV space year after year and repeat the cycle.

Another scenario is a person could come up to a lodge for a vacation in Alaska. During their vacation, they buy a cabin and return almost yearly. They do not buy a resident fishing license in the state which they work and reside in that state for 11 months out of the year. They intend to return most years to the cabin in Alaska. They purchase a resident ADF&G sport fishing license and obtain an Alaska subsistence salmon permit. The person is eligible because they are domiciled in Alaska according to the current definition and the Alaska Court System. When charged for giving a false statement on an ADF&G resident license, the person is found not guilty by the Alaska Court System because the person has been domiciled in Alaska for 12 consecutive months and intends to return to Alaska.

Most residents in Alaska do not comprehend how common of a situation they have in their communities concerning seasonal residents obtaining ADF&G resident benefits. The East Prince of Wales Advisory Committee purchased the ADF&G licensing list for their represented communities. The licensing list showed that several seasonal residents are in fact purchasing resident ADF&G licenses or have a Permanent Identification Card. Some of these seasonal residents can't even correctly pronounce the name of the community they claim to reside in or spell the name correctly. Mostly all of these seasonal residents will use a mail forwarding service such as the UPS Store, a neighbor, or they have a USPS Postal Box with all mail forwarded to their residence in another state.

The definition of "Domicile" under 5 AAC 39.975 and creating a definition of "Domicile" 5 AAC 75.995 as well as other respective applicable administrative codes, needs to be changed to prevent non-residents from obtaining resident benefits. True residents of Alaska are very familiar with the Alaska Permanent Fund and the requirements to be eligible to receive a yearly dividend. Changing the ADF&G Administrative Code's definition of "Domicile" to include meeting the requirements of obtaining an Alaska Permanent Fund dividend will clarify any confusion.

Alaskans will still be able to retire and visit a warm place during the winter months when this definition change is adopted. Alaska will obtain additional funds not only from the increased non-resident license sales, but also from the 3 to 1 dollar matching federal funds through the Dingell-Johnson and Pittman-Robertson funds. Currently a resident sport license costs \$29. Alaska would also receive \$87 of federal matching funds. Total revenue to the state is \$116 for a sale of a resident sport fishing license. If a non-resident sport license is purchased at \$145, Alaska would also receive \$435 in matching federal funds. Total revenue to the state is \$580 for the sale of an annual non-resident sport fishing license.

This change of the definition of "Domicile" will ensure the fish and game resources are for Alaskans. Seasonal and often referred locally as "fake" residents will most likely not meet the definition requirements and have to purchase non-resident licenses in Alaska. The increased licenses revenue will benefit Alaska at a much needed time. The fish and game populations will be better protected for the residents of Alaska as a seasonal "fake" resident will no longer qualify for resident bag limits or subsistence rights.

PROPOSED BY: East Prince of Wales Fish and Game Advisory Committee

Comments:



We do not support Proposal 23 as written, nor is it legal to include such unnecessary personal information to sport fish in Alaska. Fishermen may well be fishing illegally in Alaska, however, a definition should not include a person's place of business, taxes, voter registration, residency, stored location of household goods, etc. Individuals' have a right to privacy, their personal information should not be given out to fish in Alaska.

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Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

October 29, 2021

ADF&G Support Section
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Via email to dfg.bof.comments@alaska.gov

To Members of the Alaska Board of Fisheries:

On behalf of the shareholders of Ahtna, Incorporated (Ahtna), we are submitting the following comments on select proposals in the Board of Fisheries' 2021-2022 Proposal Book. Ahtna is an Alaska Native Regional corporation formed pursuant to the Alaska Native Claims Settlement Act. Ahtna's shareholders consist of the Ahtna Athabascan people who have occupied the Copper River area in Southcentral Alaska since time immemorial. Ahtna holds title to approximately 1.7 million acres of land, much of which borders the Copper River and its tributaries. The Ahtna people rely on these waters for their cultural and traditional food source.

**PRINCE WILLIAM SOUND (INCLUDING UPPER COPPER
AND SUSITNA RIVERS) FINFISH AND SHELLFISH (EXCEPT SHRIMP) PROPOSALS**

Commercial Groundfish

PROPOSAL 5

5 AAC 24.361. Copper River King Salmon Management Plan.

Establish an optimal escapement goal for Copper River king salmon, as follows:

Adopt an optimum escapement goal for Copper River King Salmon:

Sustainable Escapement Goal, current 24,000 lower bound Sustainable Escapement Goal, ADF&G revision 21,000-31,000 **Optimum Escapement Goal, proposed 24,000-40,000**

The proposed OEG can be expected to provide high levels of both yield and recruitment. ADFG Memorandum of March 16, 2020 reported that the optimum yield profiles suggest yields diminish as you approach 40,000 spawners, which justifies an upper boundary for an escapement goal.

What is the issue you would like the board to address and why? A precautionary escapement goal is necessary for Copper River King Salmon because the aggregate goal is unlikely to provide adequate protection for the dozens of populations that occur in this very large and diverse basin. The aggregated goal may not provide adequate protections to maximize yield or recruitment of different populations



with different run timings and varying levels of productivity. This problem is reflected in a very high degree of variability in the historical stock-recruitment data for the aggregate stock where escapements between 21,000 and 31,000 can produce run sizes of anywhere from 30,000 and 110,000.

PROPOSED BY: Kenai River Sportfishing Association

Comments:

We support Proposal 5, with amendment to establish an optimal goal of 35,000 – 50,000 for king salmon in the Copper River. The king salmon escapement goal should not be lowered, as the department is proposing to do, because it has not been met in recent years. As written, this proposal would establish an escapement goal range that maintains the existing 24,000 king salmon as the lower bound. While we have concerns about whether this proposal is adequate, it is certainly a better alternative than the department's plan of lowering the escapement goal to 21,000 king salmon, which would result in more king salmon harvested by the commercial fishery, and fewer king salmon on the spawning grounds.

King salmon have seen marked declines in recent years. Estimated total run size averaged 47,386 for the 2010 – 2019 period, compared with 86,684 for the 1998 – 2007 period (Schwanke 2019: 3; appendix C). In 2010, 2014, 2016 and 2020, estimated king salmon escapement fell below the current minimum escapement goal (24,000).

We cannot reverse this trend of king salmon decline by lowering escapement goals and putting fewer salmon on the spawning grounds. Already, we are seeing marked declines in body size, reducing the reproductive potential of each fish. Studies have shown that recent cohorts of king salmon are spending only three years at sea, whereas 30 years ago they would spend four years at sea. The department's plan to lower the king salmon escapement goal to 21,000 salmon could potentially exacerbate this already concerning trend. Smaller-sized king salmon necessitate more escapement to compensate for this reduced reproductive potential.

In practice, fisheries are currently being managed for commercial and personal use, and not for subsistence. See AS 16.05.258.

Upper Copper River Personal Use and Subsistence

PROPOSAL 6

5 AAC 01.630. Subsistence fishing permits; 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan; and 5 AAC 52.XXX. New section.

Require in-season reporting of subsistence, sport fish, and personal use harvest and effort, as follows:

Daily harvest reporting is already required on the Copper River for all fisheries except sport. In- season reporting would be relatively simple and could be done using an online app.

What is the issue you would like the board to address and why? Copper River fisheries managers currently rely on an abundance-based management model that does not collect in-season harvest data



Participants in this fishery are required to report their recorded daily harvests to the department within three (3) days of when those harvests occur. Participants must report harvest attempts for any days during which their fishing gear was in the water, even if these harvest attempts are unsuccessful.

Harvest reports can be made using an online app or a call-in number and has very little empirical data about actual escapement onto the spawning grounds. This model assumes that escapement can be accurately estimated using on abundance at the Miles Lake sonar and harvests from previous years.

However, recent events suggest that the in-river harvest exceeds what can be biologically sustained and is not detected by our current harvest reporting system. The Gulkana hatchery has not been able to obtain its brood stock since 2015, while the 2018 sockeye run failure caught managers by surprise.

Obtaining accurate in-season harvest information would help to protect against the possibility of over harvest due to variable harvest levels and under reporting post-season.

PROPOSED BY: Karen Linnell

Comments:

We support Proposal 6. We feel strongly that there is a need for more timely harvest data in the upriver subsistence, sport, and personal use fisheries. This could help to enable agile and informed management decisions, especially during times of low abundance. If executed well, it could also help to build greater trust between fisheries managers and participants in Copper River fisheries.

Sockeye abundance throughout the 2018 and 2020 seasons was extremely low, resulting in unprecedented restrictions on the personal use and subsistence fisheries, and the closure of the commercial fisheries for nearly the entire season. While scientists do not know definitive causes for the recent run failures, they have caused concern among Ahtna fishers and other residents of the region, many of whom had already worried about the health of Copper River salmon stocks based on their observations and traditional knowledge. Meanwhile, the upper Copper River personal use fishery showed a clear trend of increasing participation and harvest during the 2007 – 2016 period, while the subsistence fishery has also seen greater numbers of permits issued in recent years (Botz and Somerville 2017: 35, 45).

The needs of long-term subsistence fishing families are not being met. The Alaska Board of Fisheries' Amount Necessary for Subsistence uses of salmon in the Gakona to Slana and Batzulnetas reach of the Copper River has only been met in 2 years during the past 15 years since the ANS was adopted. Similarly, ANS has not been met in 3 of the past 4 years in the reach of the river from the mouth of the Tonsina to the mouth of the Gakona. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success as defined in AS 16.05.258(f).

In-season assessment of sockeye salmon and king salmon harvest levels in the upper Copper River could play a role in ensuring the long-term, sustainable management of in-river fisheries. In-season escapement modeling aggregates data from previous years' personal use and subsistence fisheries, as participants in these fisheries are not required to submit their harvest records until after the end of the



fishing season (5 AAC 77.591; 24.360-361). With the recent discontinuation of the Long Lake Weir, fixed escapement enumeration projects in the upper river are limited to the Gulkana Counting Tower and the Tanada Weir (which has been unable to operate the past three years). Aerial surveys depend on favorable weather conditions during a very narrow window of time. Instead, managers use an abundance-based model that relies heavily on the Miles Lake Sonar near the mouth of the Copper River. Accurate in-season data would help to augment management with an additional source of empirical data on upriver salmon migration.

It should be acknowledged that some ADF&G biologists have previously expressed the view that the current management system is working well, and that there is no need for in-season harvest data. While we tend to believe that more harvest data would be helpful, we acknowledge managers' first-hand expertise, and understand that those who do not see the importance of in-season harvest data have valid reasons for these viewpoints. For instance, there is a chance that having in-season harvest data would change little about how the fisheries are run. Despite this ambiguity, it is worth implementing this change because of its potential to build greater trust in management among Copper River fishers. Because current in-season management methods rely heavily on modeling, they tend to be inaccessible to the public. Some fishers and other stakeholders have questioned whether the models are reliable and whether managers have enough information to make informed decisions. Whether well-founded or not, these doubts have grown louder after the low returns of 2018 and 2020. Collecting empirical harvest data in near real-time could help to demonstrate to the public that ADF&G takes their concerns seriously and is trying to use as much information as possible to inform its management decisions. This would be especially helpful if the harvest data could be presented to the public in an accessible way during the fishing season (e.g., as Miles Lake sonar passage data is presented on the ADF&G website).

While this proposed change would require more frequent reporting, it would not require personal-use or subsistence fishers to report any more data on their harvests than is required currently. Subsistence and personal-use fishers are already supposed to write down their harvest totals each day, by species, and are required to report these totals at the end of each season. Until 1999, ADF&G required personal use dipnet fishers to report their harvests at the end of each trip, but the system was discontinued when the department made permits available at locations outside of the region (Botz and Somerville 2017). For most users, it would be easy to do this reporting using an online app. For those without smartphones or reliable internet connections, other options should be made available, such as a call-in number. If the Board of Fisheries feels that the three-day reporting requirement suggested in this proposal is too onerous, it could amend the proposal to lengthen this time period.

In October 2020, the Southcentral Regional Advisory Council (SCRAC) voted in favor of requiring in-season reporting for federal subsistence users. Federal subsistence fishers harvest far less than participants in the State subsistence and personal-use fisheries. Although members of the SCRAC represent the interests of federally qualified subsistence users, they were willing to support this requirement in the name of conservation and better data collection. In-season data from the Federal fisheries would be far more useful if it were also available from State fisheries.

Timely reporting would produce better-quality data than end-of-season reporting. A common problem with the current system is that subsistence fishers often fail to keep their permits up to date, waiting to fill them out until the end of the year when they are due, and guessing about their daily catch totals.



During years of low abundance this data could provide more granular and accurate data on the fishery, enabling more adaptive management decision-making. It could also help to build trust and consensus between fisheries management and the local public. We must take a proactive stance toward salmon management rather than waiting for the next crisis to occur.

PROPOSAL 7

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit guiding in subsistence finfish fisheries, as follows:

5 AAC 01.620

e) The permit holder must personally operate the fish wheel or dipnet. A subsistence fish wheel or dipnet permit may not be loaned or transferred except as permitted under 5 AAC 01.011.

NEW. (1). No guide or transport service shall charge a fee of a permit holder participating in fishery and no permit holder may give a fee to participate in the fishery.

What is the issue you would like the board to address and why? Lack of clarity for commercial enterprises starting to capitalize on subsistence fisheries. There are regulations for no fees to be involved with community permits for subsistence game hunts reference 5 AAC 92.072. It seems counter intuitive then to allow commercial guide entry into a subsistence fishery who then in turn charge people to navigate the boat for them, show them how and where to fish, help them fish, land, and process the catch all for a widely advertised fee structure.

PROPOSED BY: Shawn Gilman

Comments:

We support the concept of Proposal 7 prohibiting a Guide or Transporter to charge a fee to take subsistence fisheries permit holder fishing in the Copper River. The Community Subsistence Hunt disallows hunters from receiving a fee for the taking of game or receipt of meat. This regulation should also apply to subsistence fishing in the Copper River. Alaska law defines subsistence use as customary and traditional non-commercial use (AS 16.05.940(7) and (34)), which should prohibit transporters or guides from charging a fee associated with fishing under a subsistence fishing permit in the Copper River.

Prince William Sound/Upper Copper River/ Upper Susitna River Fisheries Proposals

PROPOSAL 8

5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting near tributary mouths of the Upper Copper River District, as follows:

No dip netting in the confluence 500 yards below and 100 yards above any river or stream in the upper Copper River.

What is the issue you would like the board to address and why? Dip netting in the upper Copper River. If we do nothing, we will continue to see our wild stock and Gulkana Brood stock decline. In some



drainages that are very small we could lose that entire wild stock. Wild stocks are stopping and resting in these areas before continuing upriver. The wild stocks are time sensitive and travel in small groups leaving them very vulnerable to over harvest in these areas. Remember these stocks are in some cases very small. There have been very little studies in these areas and there is virtually no data to support keeping these areas open until there is some kind of analysis. We already have an example of this that exists in the Gulkana confluence and 500 yards below that is fly fishing only. This only lets a sport fisher to take 3 reds and 1 king. The way the current dip net regulation reads, you can fish in the same area and the limit is 200 and in some cases more. This goes against the idea of trying to protect wild upriver stocks and brood stock at the Gulkana hatchery. They have not met their goals at the hatchery in the past 5 years and in some cases very low. This is only one example of how we can start to bring back our brood stocks, both wild and Gulkana hatchery. Something needs to be done soon about this problem. I have done my best to write this proposal in laymen's terms. I could quote several sections from ANILCA that directly relate to this issue. Also, there is very little scientific data on this issue.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 8 with modification, such that the adoption would restrict dipnetting around the mouths of salmon-spawning tributaries (as opposed to "any stream or river" as the original proposal is worded). This would protect stock diversity, which is a concern on streams with small spawning populations that can easily be fished out. While returns on these tributaries may be small today, the genetic diversity these stocks provide may be important for resilience and adaptation to environmental change. Some tributaries are easy to access by large numbers of fishers and are therefore fished at disproportionately high rates.

PROPOSAL 9

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit dipnetting from a boat in the Glennallen Subdistrict, as follows:

Eliminate Dip netting from boats as a method to take from the Glennallen sub district (up-stream from the bridge at Chitina).

What is the issue you would like the board to address and why? A lot of dip netters take fish at the mouths of tributaries off the Copper River. Currently there are markers only on the mouth of the Gulkana River. There are already fish wheels north of the Bridge at Chitina. You can dip net below

the bridge at Chitina as well, so there is opportunity to get fish dip netting. By not allowing dip netting above the bridge more fish will make it to spawning areas.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee

Comments:

We strongly encourage the Board of Fisheries to adopt Proposals 9, 10, 11, and/or 13, all of which address the issue of dipnetting from boats. We feel that the dramatic increase in this method's



popularity (Botz and Somerville 2017) poses significant conservation concerns. Proposal 9 (submitted by the Copper Basin AC) would prohibit dipnetting from boats in the State subsistence fishery in the Glennallen subdistrict; Proposal 10 (submitted by Ahtna Tene Nene') would prohibit dipnetting from boats in both the subsistence and personal-use fisheries in the Upper Copper River; and Proposal 11 would require boat dipnetters to tie off to the riverbank while fishing. Adopting any of these proposals would be a strong step toward reining in a technological innovation that is unregulated and growing in an uncontrolled way.

Salmon often delay their upriver migration during high water events, resting in deep parts of the river and/or areas such as eddies where the current is less intense. During these times, catch per unit effort for fish wheels and onshore dipnetters tends to be quite low. However, dipnetters in boats are able to move throughout the river and target these resting areas. On the middle Copper River (i.e., Chitina – Gulkana), subsistence fishers have observed that when the water begins to recede, large pulses of fish often follow, bringing very good fishing during the following days. During the past several years, local/traditional observations suggest that these pulses of fish have not occurred in the same way. Although research into this topic is needed a likely explanation for this change is that boat-based dipnetters are catching much of the fish that are resting in these deep pockets.

The needs of long-term subsistence fishing families are not being met. The Alaska Board of Fisheries' Amount Necessary for Subsistence uses of salmon in the Gakona to Slana and Batzulnetas reach of the Copper River has only been met in 2 years during the past 15 years since the ANS was adopted. Similarly, ANS has not been met in 3 of the past 4 years in the reach of the river from the mouth of the Tonsina to the mouth of the Gakona. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success.

The mobility of boat dipnetters gives them a competitive advantage over both fishwheel users and dipnetters who fish from shore. Both fishwheel users and onshore dipnetters have reported disruptive encroachment by fishers that are dipnetting from boats. Because fishwheels are large and stationary, they have no way of avoiding dipnetters from boats who are inconsiderate and come too close. This can also be an issue for dipnetters who are fishing from shore, as onshore fishing sites are limited in some parts of the river.

Proposal 11 may be an effective compromise that would not ban the practice outright but could address many of the conservation concerns that accompany it. Under this proposal, dipnetters would still get the benefit of mobility that boats provide but would be restricted from scooping up fish in the middle of the river.

Dipnetting salmon from boats is not a customary or traditional use of the resource. As such, the State has no imperative reason to permit it as a method for subsistence fishing. In traditional times, Ahtna fishers dipnetted from shore or from platforms that extended into the river (Simeone and Valentine 2007) but did not dipnet from boats floating in the river. Even among non-native settlers, dipnetting from boats does not have a long enough history to be considered a customary or traditional use of the resource.



This is a practice that is very recent. Although this is not a difference in the equipment used to harvest salmon, it represents a dramatic change in the way in which the fishery is regulated. Using boats to drop people off on shore is different than the practice of dipnetting from a boat, which more closely resembles trawling, as defined in 5 AAC 39.105(10): "a net towed through the water to capture fish or shellfish." Dragging nets through the river does not have a history of customary or traditional use on the Copper River. Boats have a competitive advantage over fishers who fish from shore.

The problems with dipnetting from boats are compounded by the lack of adequate enforcement in the fisheries on the upper Copper River. There is very little enforcement on the ground in popular fishing areas, let alone in more remote reaches of the river that can be easily fished by boats.

The fact that the Fairbanks AC has submitted Proposal 18, which would extend the boundary for the dipnet fishery downriver by ½ mile to address the crowding of boats, indicates that there is a marked increase in the prevalence of dipnetting from boats and unsafe crowding issues.

PROPOSAL 10

5 AAC 01.620. Lawful gear and gear specifications; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a boat in the Upper Copper River District, as follows:

Dipnet fishers in the must harvest from shore, from islands in the river, or from stationary objects connected to shore. Dipnet fishing from boats or craft floating in the river is not permitted.

What is the issue you would like the board to address and why? Many Copper Basin residents with intensive local knowledge of salmon ecology have raised concerns about the health of Copper River salmon stocks. The Gulkana Hatchery has not had enough brood-stock to meet its egg-take goals since 2014. Although overall escapement levels have been reasonable in the Copper drainage, very little tributary-by-tributary data are collected. Smaller stocks can easily be damaged by overharvest. Dipnetting from boats in the subsistence fishery raises some particular concerns. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. Fishermen who fish from boats are able to target salmon that are concentrated in these areas. The increased popularity of dipnetting from boats since 2010, combined with the high numbers of fish that each subsistence dipnetter can harvest, could be contributing to the depletion of some smaller stocks.

PROPOSED BY: Ahtna Tene Nene'

Comments:

See comments under Proposal 9.

PROPOSAL 11

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a moving boat in a portion of the Chitina Subdistrict, as follows:



Personal-use fishers who are fishing from boats between the mouths of O'Brien Creek and Haley Creek must be tied off to the riverbank, to an object on the riverbank, or to a stationary object in the river. (This does not apply to charter operators.)

What is the issue you would like the board to address and why? The recent trend of increased dip netting from boats presents some management challenges that demand sensible conservation measures. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. By dip netting from motorized boats, fishermen are able to target these stocks with a precision that other fishers lack. By motoring slowly while dip netting, fishers in boats can "trawl" slowly down the river, running more cubic feet of river water per minute through their nets than their counterparts on shore are able to.

If boat dipnetters were required to tie off to shore, it would help to level the playing field, and decrease some of the pressure on the resource. Fishers with boats would still have the advantage of being able to move around the river, quickly and easily, to different fishing spots.

There have also been some safety concerns about dip netters from boats in the Woods Canyon area. The current in this area is very strong, and there are very few beaches or banks suitable for landing a boat.

PROPOSED BY: Nicole Farnham

Comments:

See comments under Proposal 9.

PROPOSAL 12

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a boat when within 50 feet of a person dipnetting from shore in the Chitina Subdistrict, as follows:

No personal-use fishing from boats is permitted within 50 feet of any personal-use fisher who is standing either on the riverbank, on a rock in the river, or on any permanent, immobile object connected to shore.

What is the issue you would like the board to address and why? With the increasing popularity of dip netting from boats, there have been some issues with user conflicts between dip netters who are using boats and those who are dip netting from the shore in the personal-use area. An increasing number of dip netters who dip net from the riverbanks have expressed concern that fishers in boats have been coming too close for comfort. This can be frustrating and encroach on those without boats, making it more difficult to harvest fish.

In the Woods Canyon area, the banks are very steep, and the number of dip net sites is not unlimited. Also, it is much easier for a boat to move up or down the river (avoiding conflict) than for a dip netter on the riverbanks to move to another spot. For a shore dip netter to move, they usually must pack equipment and fish up a steep embankment.



The recent trend of increased dip netting from boats presents some management challenges that demand sensible conservation measures. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. By dip netting from motorized boats, fishermen are able to target these stocks with a precision that other fishers lack. By motoring slowly while dip netting, fishers in boats can "trawl" slowly down the river, running more cubic feet of river water per minute through their nets than their counterparts on shore are able to.

If boat dipnetters were required to tie off to shore, it would help to level the playing field, and mitigate some of the pressure on the resource. Fishers with boats would still have the advantage of being able to move around the river, quickly and easily, to different fishing spots.

There have also been some safety concerns about dip netters from boats in the Woods Canyon area. The current in this area is very strong, and there are very few beaches or banks suitable for landing a boat.

PROPOSED BY: Nicole Farnham

Comments:

We support Proposal 12. We have concerns about a trend of increased efficiency of the personal use fishery resulting from the rising popularity of dipnetting from boats. Adopting this proposal would be a strong step toward reining in a technological innovation that is unregulated and growing in an uncontrolled way.

We would prefer that the Board of Fisheries adopt proposal 10, which would ban dipnetting from boats in the upper Copper River district. However, if the Board of Fisheries declines to adopt Proposal 10, we feel that this proposal would partially address the concerns surrounding this practice.

PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit dipnetting from a boat within 75 feet of an operating fish wheel in the Glennallen Subdistrict, as follows:

Subsistence fishing from boats may not occur within 75 feet of any fishwheel in operation.

What is the issue you would like the board to address and why? With the increasing popularity of dip netting from boats, there have been some reports of user conflicts between dip netters and fish wheel operators. A number of fish wheel owners have expressed concern that they have had dip net fishers come too close for comfort. This can encroach on the fish wheel operators' ability to harvest fish. Fish wheels are stationary, so their operators cannot simply go elsewhere to avoid encroachment or conflict. Moreover, there are only a limited number of fish wheel sites on many sections of the river.

PROPOSED BY: Faye Ewan



Comments:

We support Proposal 13 to restrict dipnetting from boats adjacent to operating fishwheels. Fishwheels are large, stationary equipment that cannot be easily relocated from one site to another. Fishwheel sites are very limited on the upper Copper River. Boats, on the other hand, are perfectly mobile and can fish on any of the expansive reaches of the river where there are no fishwheels. In recent years, fishwheel users in the Glennallen subdistrict have complained about dipnetters in boats encroaching too closely on their fishing sites. This proposal would help to discourage user conflicts and encourage respect for space.

We would prefer that the Board of Fisheries adopt Proposal 10, which would ban dipnetting from boats in the upper Copper River district. However, if the Board of Fisheries will not adopt Proposal 10, we feel that this proposal would partially address the concerns surrounding this practice.

PROPOSAL 14

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit the use of gillnet mesh in dip nets, as follows:

Dip nets rigged with monofilament and multifilament mesh may not be used before August 15. Before this date only dip nets rigged with branded, inelastic mesh are permitted.

What is the issue you would like the board to address and why? Recent Copper River abundance and escapement estimates have raised concern about the drainage-wide health of Chinook salmon populations. For this reason, fishers have been permitted to keep only 5 Chinook salmon per year. However, the use of dip nets with monofilament or multifilament mesh (i.e., Gill-net material) has raised concern about survival rates of Chinooks that are caught and released. Compared with braided inelastic mesh nets (i.e., seine-style), salmon tend to become far more entangled in monofilament-type nets. It can take as long as ten minutes to untangle and release a salmon from such a net. Salmon experience stress and increased mortality rates in proportion to the length of time they are out of the water. Additionally, these entanglements frequently cause injuries, such as split tailfins, which further increase their mortality.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 14, which would ban monofilament-type dipnets between June 1st and August 15th. The impact of monofilament nets on chinook salmon survival was originally brought to our attention by a guide on the Copper River who has many years of experience and extensive local knowledge of dipnet fisheries and their effect on salmon. While chinook salmon run sizes have fluctuated, they have shown a clear trend of decline during the past 20 years (Savereide et al. 2018). Biologists are investigating the reasons for these declines. Multiple factors are likely implicated in these changes, such as changing ocean conditions. Even so, simple inriver conservation measures would help to maximize the survival rates of chinook salmon during spawning migration, while still maintaining in-river harvest opportunities.



This proposal could reduce mortality among chinook salmon caught in nets and then released back into the river. These releases occur frequently with chinook salmon, both when dipnet fishers have exceeded their seasonal limits, and when fishers voluntarily release chinook salmon due to conservation concerns. Salmon are far more likely to become severely entangled in monofilament/multifilament nets than in nets with inelastic bags. As the same kind of mesh material used in gillnets, monofilament nets are more likely to catch fish on the jaws, gill-plates, fins, and other protruding areas of the fish, as well as to stretch and become tightly girdled around their abdomens. These entanglements can cause direct injuries to the salmon (e.g., split tailfins, broken gill-plates, abrasion), and can make untangling salmon from these nets a far longer and more difficult process, especially for inexperienced fishers. Longer time out of the water leads to increased stress and greater likelihood of mortality. Inelastic type dipnets are far more likely to enclose the salmon without causing excessive entanglement or injury.

Both dipnets constructed with inelastic seine-style mesh, and the traditional Ahtna style made with inelastic mesh, are effective at catching salmon. Inelastic, seine-style nets are widely available and are no more expensive than monofilament-type nets. This proposal would not reduce opportunity and would have no effect on the number of chinook salmon federally qualified for dipnet fishers to retain each year.

One slight modification to this resolution should be considered: as it is currently worded, this resolution could be interpreted as prohibiting the rigid dipnets that are customary and traditional to Ahtna fishers (now commonly made of chicken-wire). Because of their rigidity, these traditional-type nets do not cause entanglement or conservation issues. We believe that removing the word "braided" as shown below would allow for the use of these traditional-type nets.

"You may not use a dipnet that is rigged with monofilament or multifilament mesh before August 15th (when the majority of the Chinook run has passed into the upper Copper River). Before this time, your dipnet must be rigged with ~~braided~~, inelastic mesh."

PROPOSAL 15

5 AAC 01.620. Lawful gear and gear specifications; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of gillnet mesh in dip nets, as follows:

Eliminate Monofilament/Multifilament/web gill net material on dip nets on the Copper River.

What is the issue you would like the board to address and why? When you catch fish in multifilament dip nets it is really hard to get fish out. When you do finally get fish out of the net if you have a King and have to release, they will probably die when you release. The advantage of monofilament/multifilament nets is that the nets glide in the water easier than other material

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

Comments:

See comments under Proposal 14.



PROPOSAL 16

5 AAC 01.620. Lawful gear and gear specifications; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of depth or fish finders on boats in the Upper Copper River District, as follows:

No electronic devices that indicate bathymetry and/or fish locations are permitted on boats while they are participating in this fishery in the upper Copper River drainage from June 1 to September 30.

What is the issue you would like the board to address and why? The use of electronic devices that indicate bathymetry and/or fish locations (i.e., fish finders) is contributing to unsustainable harvest practices on the upper Copper River. These devices enable fishers to locate and target specific holding areas in the river. Wild stocks are very vulnerable in these areas. These stocks are very time-sensitive and probably travel in small groups and use these areas to hold before continuing upriver. If we do not address this issue, we will continue to see our wild stocks and Gulkana brood-stocks not meet their objectives. The Gulkana Hatchery has not met their brood- stock goals for the past five years, and this is surely also the case for some wild stocks.

PROPOSED BY: Kirk Wilson (EF-F20-014), Copper Basin Fish and Game Advisory Committee

Comments:

We support Proposal 16, which would ban fish finders from boats that are fishing on the Copper River. If proposals 9, 10 and/or 11 are approved, this proposal will not be necessary. However, if these proposals are voted down, the Board of Fisheries should ban the use of devices that enable boat-based fishers to target schools of fish. This targeting contributes to the overfishing of salmon during high-water events, as mentioned above.

The needs of long-term subsistence fishing families are not being met. The Alaska Board of Fisheries' Amount Necessary for Subsistence uses of salmon in the Gakona to Slana and Batzulnetas reach of the Copper River has only been met in 2 years during the past 15 years since the ANS was adopted. Similarly, ANS has not been met in 3 of the past 4 years in the reach of the river from the mouth of the Tonsina to the mouth of the Gakona. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success in harvesting salmon.

Fish finders are a technology that is in no way customary or traditional to the subsistence fishery on the upper Copper River. Restricting fish-finders would most likely have little impact on experienced fishers who usually already know where to find schools of fish on the Copper River. It would, however, encourage inexperienced fishers to develop the knowledge and experience that is critically important for fishing on a swift, dangerous river such as the Copper River. Fish-finders are not necessary as a safety device on the Copper River, as the river is too swift and silty for them to be effective. In fact, their use promotes more dangerous boating behaviors because fishers who use fish-finders tend to look down at these devices when they should be actively trying to read the river.



PROPOSAL 17

5 AAC 01.645. Subsistence bag, possession, and size limits; annual limits.

Establish specific permit and bag limits when dipnetting from a boat in the Glennallen Subdistrict, as follows:

If using a standard subsistence permit, dipnet fishers in the Glennallen subdistrict must harvest from shore, from islands in the river, or from stationary objects connected to shore. Upon request, subsistence fishers may obtain a supplemental permit to dipnet harvest salmon from boats, with the following limits applying to boat-caught salmon:

- (A) no more than a total of 30 salmon for a permit issued to a household with one person, of which no more than five may be king salmon;
- (B) no more than a total of 60 salmon for a permit issued to a household with two or more persons, of which no more than five may be king salmon.

What is the issue you would like the board to address and why? Many Copper Basin residents with intensive local knowledge of salmon ecology have raised concerns about the health of Copper River salmon stocks. The Gulkana Hatchery has not had enough brood-stock to meet its egg-take goals since 2014. Although overall escapement levels have been reasonable in the Copper drainage, very little tributary-by-tributary data are collected. Smaller stocks can easily be damaged by overharvest.

Dipnetting from boats in the subsistence fishery raises some particular concerns. Wild salmon stocks tend to hole up in deep areas and rest on their way up the river, especially during high water. Fishermen who fish from boats are able to target salmon that are concentrated in these areas. The increased popularity of dipnetting from boats since 2010, combined with the high numbers of fish that each subsistence dipnetter can harvest, could be contributing to the depletion of some smaller stocks.

PROPOSED BY: Faye Ewan

Comments:

We support Proposal 17. We are concerned about the increased numbers of subsistence permittees fishing under State subsistence permits. These users are increasingly using boats to harvest salmon, and we cannot yet fully evaluate the impact of this on stock diversity, given that dipnetting has customarily and traditionally been conducted from shore and has almost exclusively harvested bank-oriented salmon. Accordingly, we support this proposal for precautionary reasons—it would still allow all dipnetters the opportunity to harvest significant numbers of salmon, but would help to ensure that smaller, sensitive stocks are not overfished as a result of the increasing popularity of dipnetting from boats.

PROPOSAL 18

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Extend the lower boundary of the Chitina Subdistrict downstream ½ mile, as follows:

Currently in regulation 5 AAC 77.591(h), the Chitina Personal Use Dipnet Fishery (CPUDF) boundary consists of all mainstream waters of the Copper River from the downstream edge of the Chitina



McCarthy Bridge downstream to an east west line crossing the Copper River approximately 200 yards upstream of Haley Creek.

Our proposed remedy for the hazard of so many boats fishing in a small area is for the BOF to approve extending the CPUDF lower boundary approximately ½ mile downstream from the existing CPUDF lower boundary. This would allow boat dipnetters a longer continuous drift, allowing more spacing between boats, and alleviate the dangerous congestion of boats that occurs now.

New wordage in 5 AAC 77.591(h) would read **“For the purposes of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina-McCarthy Bridge downstream to a line crossing the Copper River from a point just downstream of Canyon Creek on the east (lat. 61 deg. 24'30.00"N -- lon. 144 deg. 28'39.00"W) to a point directly across the Copper River on the west (lat. 61 deg. 24'37.00"N—lon. 144 deg. 29'3.00"W)**

This small increase in size of the Chitina Sub-district is unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan.

The Chitina Dipnetters Association in its public comments will include a map identifying the existing and proposed lower boundaries.

What is the issue you would like the board to address and why? In the last 10 years, drift dipnetting from personal boats has substantially increased as a method of harvesting salmon in the CPUDF. This is in large part due to the very limited number of suitable sites available for shore based dipnetting. Because much of the CPUDF lies within the deep turbulent waters of Woods Canyon on the Copper River, productive areas to dip from boats are very limited. A favorable and high use area for drift dipnetting from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the lower boundary of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with up to and over 15 boats drifting the same area. This congestion of boats has created a very dangerous navigation hazard for these boaters within the swift waters of the Copper River.

PROPOSED BY: The Chitina Dipnetters Association and Fairbanks Fish and Game Advisory Committee

Comments:

We strongly oppose Proposal 18, proposed by the Chitina Dipnetters' Association (CDA) and the Fairbanks Fish and Game Advisory Committee (Fairbanks AC), which would extend the area for personal use dipnetting downriver by one-half mile.

Given the low sockeye returns of 2018 and 2020, this is an inopportune time to extend harvest opportunity in the Chitina Dipnet Personal Use Fishery (CPUDF). Proposal 18 correctly points out that “drift dipnetting from personal boats has substantially increased as a method of harvest in the CPUDF.” The proposal attributes this increase to the fact that there is a limited number of suitable sites for shore-based dipnetting, and similarly points out that personal use fishers who dipnet from boats are



constrained to very small “productive areas”—primarily between the mouth of Wood Canyon and the regulatory marker at Haley Creek.

All of these assertions highlight the fact that there is crowding at personal use dipnet sites, one indicator of the immense pressure on the resource, which is constantly increasing with the growing participation of urban users. While extending the regulatory boundary one-half mile downriver may provide some temporary relief from this congestion, over the long term, we can expect it will only attract more dipnetters. It is likely that the expanded area would eventually become just as crowded as the current downstream end of the fishery. If this happens, it is likely that the CDA might again complain about the crowding, and again ask the Board of Fisheries to extend the boundary even further downriver. They have already tried to do this in 2017 with Proposal 17, which would have extended the lower boundary of the personal-use fishery down to the mouth of the Umanatna River.

The proposal claims that this change would be “unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan.” However, the lack of in-season harvest data and minimal coverage by weirs and counting towers in the Copper drainage means that managers rely on general estimates—based largely on multi-year patterns—to infer the harvest efficacy of the personal use fishery at given points during the fishing season. Managers do not obtain precise estimates of how many salmon have been harvested until many months after the end of the fishing season. Because of this, closures provide only a very coarse way of controlling harvest levels in the upriver fisheries. This proposal is clearly an attempt to extend opportunity. Most likely, this will result in increased fishing effort, which will result in some additional harvest. While this additional harvest would be fairly modest, during years of low abundance, it could be a significant factor in eventual escapement estimates, or in the number of fish available for the subsistence users upriver.

While ADF&G’s data indicated a healthy total sockeye run size between 2007 and 2016 (Botz and Somerville 2017), the exceedingly poor runs of 2018 and 2020 are troubling. The last time the Copper River has seen sockeye runs this weak was nearly four decades ago, in 1980 – 81 (Simeone and Valentine 2007). Because it is too soon to say for certain whether 2018 and 2020 are an aberration or the beginning of a longer-term pattern, it makes sense to use the precautionary principle, and to be conservative in enacting new regulations.

Even if future sockeye returns are strong, king salmon have shown definitive patterns of decline during the past decade. Every effort should be taken to conserve king salmon stocks and prevent them from further declining. Although total annual Chinook retention reported in the personal use fishery has been relatively small (generally in the range of 1,000 – 3,000 per year, according to information on the ADF&G website), dipnetting mortality due to catch and release is poorly understood and is undoubtedly significant. Because this proposal is likely to increase fishing effort in an area where king salmon migrate, it is likely to increase king salmon mortality. The creation of a new federal subsistence fishery in the lower Copper River flats will compound this effect. Because Copper River salmon management focuses on sockeye, it may not be as responsive to further signs of trouble in king salmon and other species.



Changes in fishing access are likely to further strain the resource. The Alaska Department of Transportation recently improved the road from O'Brien Creek to Haley Creek. This will make motorized access by dipnetters far quicker and easier along this reach of the river. During a period of low water in September 2020, several employees of Ahtna, Inc. drove a pickup truck and a 4-wheeler across O'Brien Creek and were able to get to Haley Creek in only about 15 minutes. Despite the limited number of onshore sites discussed in this proposal, we expect that the improved road will significantly increase fishing efforts during the course of the season.

The Board of Fisheries should be prioritizing the protection of subsistence fishing, especially during low salmon returns.

PROPOSAL 19

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Reduce the maximum harvest level in the Chitina Subdistrict Personal Use Fishery when the Copper River commercial fishery harvest is 50% below the 10-year average on June 1, as follows:

Amend the Copper River Personal Use Dipnet Salmon Fishery Management Plan to factor in the effect of a below-average run on projected in-river numbers and availability for harvest by the personal use fishery.

Add a new section under 5 AAC 77.591 to read:

If the Copper River District commercial harvest is 50% below the 10-year average by June 1 the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

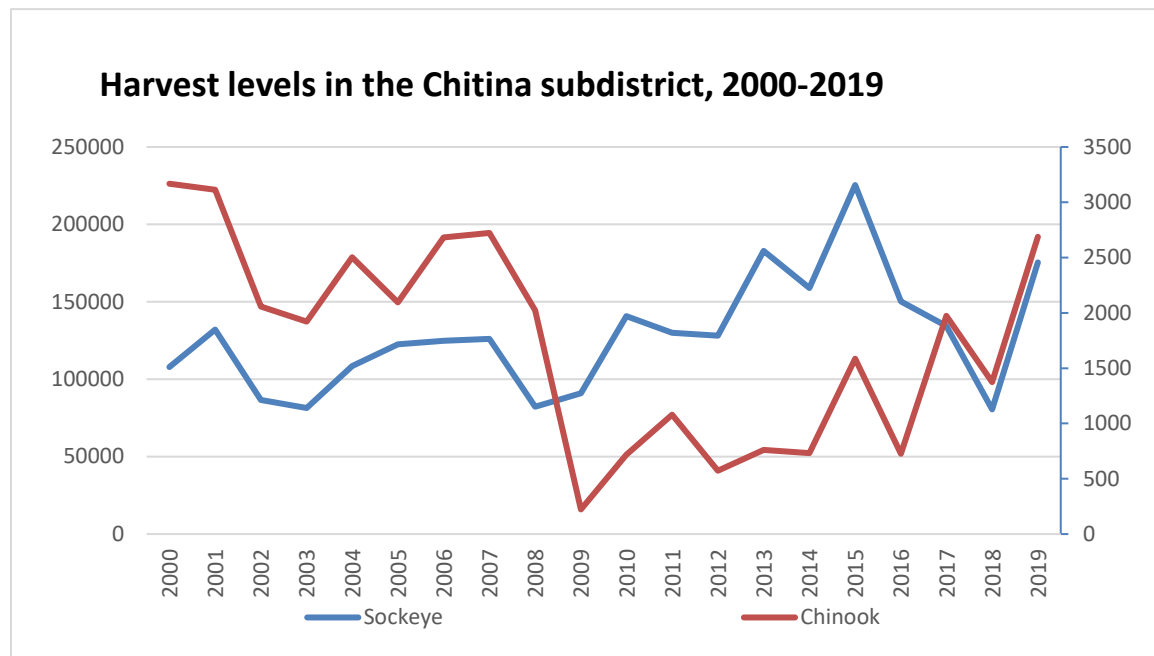
What is the issue you would like the board to address and why? In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not. In an effort for this burden of conservation to be shared amongst all user groups, we propose adopting a triggered regulation for conservation purposes.

PROPOSED BY: Cordova District Fishermen United



Comments:

We support Proposal 19 to reduce Personal Use Fisheries by 50,000 if the commercial harvest is 50% below the 10-year average by June 1st. Since 2009, average harvest levels in the Chitina subdistrict—of which the personal-use dipnet fishery accounts for the vast majority—show clear trends of increase for both king salmon and sockeye salmon (see graph below; Somerville and Hansen 2021, table 9)). The average harvest of sockeye from 2009 – 2018 was 140,340, and the average harvest of sockeye from 2014 – 2018 was 147,804. For king salmon, these trends of increase are even more pronounced. The average king salmon harvest from 2009 – 2018 was 953, compared to the more recent 2014 – 2018 average of 1,247 (Somerville and Hansen 2021, table 7).



There are significant questions about the efficacy of current in-river management. As noted in previous comments, ADF&G bases its escapement estimates on in-river abundance at the Miles Lake sonar counter, extrapolating in-river harvest/mortality based on the previous years' fishing patterns, etc. Both sockeye salmon and king salmon have seen marked declines in recent years. While the causes of this are not definitively known, in-river conservation measures could certainly aid in increasing the decline. During years when the commercial fishery is suffering severe closures, these kinds of conservation measures would seem similarly helpful in the upriver fisheries, even if their harvest levels are much smaller.

If commercial fishing is restricted, other fisheries should also be restricted to ensure sufficient reasonable opportunities for harvest in other portions of the river—particularly for the subsistence fisheries, which are the furthest upriver and have management priority over other fisheries. This proposal will help to ensure that priority customary and traditional uses are protected.



PROPOSAL 20

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Amend the annual limit for salmon in the Chitina Subdistrict, as follows:

The total annual limit for each personal use salmon fishing permit is 15 for a household of one and 30 for a household of more than one.

Supplemental permits for 10 additional sockeye shall be available when ADFG determines that a weekly harvestable surplus of 50,000 salmon or greater will be present in the Chitina Subdistrict. An additional supplemental permit may be issued to a permittee who has met the limits of a previously issued supplemental permit.

What is the issue you would like the board to address and why? In 2014, the Board of Fish (BOF) increased the limits for the Chitina Personal-Use (PU) dipnet fishery. It is now 25 sockeye for a head of household and 10 additional for each additional member. Previously, the limit was 15 sockeye for a household of one and 30 for a household of more than one, with the possibility for the Alaska Department of Fish & Game (ADF&G) to permit an additional 10 sockeye per household when there was a weekly surplus of 50,000 or more.

The previous limits were more conservative, as well as more adaptive to the in-season realities of salmon abundance. Several signs indicate that the sockeye fishery on the Copper River is currently experiencing strain. In 2018, the fishery was unable to meet its sockeye escapement goals, even after commercial fisheries remained closed for almost the entire season. For the past five years, the Gulkana hatchery has been unable to obtain sufficient brood-stock to meet its egg-take goals. A return to these previous limits would help to address these issues.

At the time this regulatory change was adopted, the justification given was that it would standardize regulations, bringing the Chitina PU fishery into line with the limits of the Kenai PU fishery. However, the Copper and Kenai are two very different river systems, with different ecological characteristics as well as different patterns of fisheries participation.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 20 to adjust Personal Use Fisheries annual limit fishing permit to 15 for a household of one and 30 for a household of more than one with supplemental permits for 10 additional sockeyes when ADF&G determines that there is a weekly harvestable surplus of 50,000 salmon or greater in the Chitina Subdistrict. As the proposer mentions, this was the limit for personal-use harvest until 2014.

As noted in the comments on Proposal 19, fishing activity in the Chitina personal use dipnet fishery has shown a general pattern of increase during the past twelve years, both in terms of the number of permits fished and in terms of the numbers of sockeye and king salmon harvested. Recent years have seen a series of very weak sockeye and king salmon runs, however in order to accommodate the



realities of increasing numbers of people using the resource, combined with declining salmon runs, harvest limits should be adjusted downward.

PROPOSAL 21

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Amend the opening date of the Chitina Subdistrict personal use fishery from June 7 to June 1, as follows:

Change June 7 personal use season opener to June 1.

What is the issue you would like the board to address and why? The June 7 start date was enacted many years ago as part of an effort for every user group to bear a perceived king salmon conservation burden, but because the personal use (PU) fishery is set by sonar numbers, and because some years there are strong early runs, and King has been generally restricted from PU harvest in recent years, the rationale no longer applies. The department can still push back the opener for biological reasons. It would not result in increased allocation, just an early start if conditions dictate.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

We strongly oppose Proposal 21, which would change the Chitina Subdistrict Personal Use fishing season start date from June 7 to June 1. Given the low sockeye and king salmon returns discussed in other comments above, this is no time to liberalize regulations on any fishery. In the past, the personal use dipnet fishery opened on June 1, but the Board of Fisheries changed this date because it compelled conservation during the early season, when limited data are available.

Last season saw the implementation of severe king salmon restrictions, with king salmon retention closed in all state fisheries (Mark Somerville, "Copper River Management Update July 21"). Additionally, the opening of the personal-use fishery was delayed by a week due to low early sockeye returns.

Given low returns of sockeye and king salmon, now is not the time to increase the number of fishing days for the Personal Use fishery. Sockeye escapement goals may have been met in recent years but run sizes have been very small and escapement has been at the lower end of the range. The escapement goal for king salmon has not been met in recent years.

There are currently no proposals before the Board of Fisheries that seek to liberalize salmon harvest regulations in the upper Copper River sport and/or subsistence fisheries. Most upper Copper River fisheries stakeholders seem to recognize the need for conservation at this time. Yet personal use dipnetters exempt themselves from these concerns by seeking expanded harvest opportunity via both Proposal 18 and this proposal.

If any change is to be made to the season start date, it should be moved later to June 14, to ensure that there is adequate opportunity for early-season escapement before intensive personal-use fishing begins.



PROPOSAL 22

5 AAC 01.616. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses.

Reverse the positive customary and traditional subsistence use determination for freshwater finfish within the Chitina Subdistrict, as follows:

Subsistence C&T findings within the Chitina subdistrict. Other freshwater finfish, negative.

What is the issue you would like the board to address and why? We are asking that you remove the positive finding of C&T on freshwater finfish other than salmon within the Chitina Subdistrict (PU fishery). The BOF has found a negative finding of C&T on all salmon within the Chitina subdistrict, but never addressed the other freshwater finfish. If salmon (the most desirable and sought fish to fulfill subsistence needs) cannot meet the eight criteria for C&T in the Chitina subdistrict then how can other freshwater finfish within the Chitina subdistrict have a positive finding? Other freshwater finfish in the Chitina subdistrict do not meet the eight criteria for a positive finding of C&T.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

We do not support Proposal 22. In December 2008, the Alaska Board of Fisheries determined that non salmon finfish species are associated with customary and traditional (C&T) uses in the upper Copper and upper Susitna rivers. In order to reverse a C&T determination, there needs to be significant new information. This proposal includes no new information indicating that patterns of use of non-salmon finfish have changed significantly since 2008. Non salmon finfish continue to be an important C&T resource utilized by the Ahtna people, as demonstrated in comprehensive subsistence research conducted by ADF&G since 2008.

Upper Copper River Personal Use and Subsistence

PROPOSAL 23

5 AAC 01.610. Fishing seasons; 5 AAC 01.616. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses; and 5 AAC 01.645. Subsistence bag, possession, and size limits; annual limits.

Reverse the positive customary and traditional subsistence use determination for rainbow and steelhead trout in the Prince William Sound Area, or establish amounts reasonably necessary for subsistence and bag and possession limits for rainbow and steelhead trout in the Prince William Sound Area, as follows:

Modify regulations to make rainbow trout and steelhead negative for C&T or identify stocks and create harvest opportunity to meet the lowest amount determined reasonably necessary to meet the positive C&T. Currently, the amount necessary for all finfish other than salmon is 25,000 – 42,000.

What is the issue you would like the board to address and why? Rainbow trout and steelhead have a positive C&T, but retention is not allowed except as incidental fishwheel catch.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee



Comments:

See comments under Proposal 22.

PROPOSAL 28

5 AAC 01.645. Subsistence bag, possession, and size limits; annual limits. Amend household harvest limits for subsistence-caught salmon, as follows:

We recommend increasing the limits of drift gillnet users to 30 salmon for a household of one, 60 salmon for a household of two, and ten additional salmon for each additional member of the household. We further seek to allow the harvest of up to 500 salmon by request, however we wish to limit these additional salmon to pink salmon and chum salmon.

What is the issue you would like the board to address and why? Subsistence salmon harvest limits in the Copper River District subsistence fishery are half that of those harvesting the same salmon stocks in the Glennallen Subdistrict subsistence fishery. A further disparity exists in the ability of Glennallen Subdistrict subsistence users to request a harvest limit increase of up to 500 salmon per household. We seek parity between the limits in these two fisheries, but we do not wish to reduce any harvest limits upriver.

PROPOSED BY: Native Village of Eyak

Comments:

We oppose Proposal 28 as written to amend harvest limits for subsistence-caught salmon for pink and chum salmon. Increasing harvest limits in the Copper River District will most certainly negatively affect the Upper Copper River District. Incidental harvest of sockeye salmon and king salmon will be caught in drift gill nets.

Escapement goals for king salmon have not been met repeatedly in recent years. Escapement returns for sockeye salmon are at the lower end of the spectrum. Brood stock returns to Gulkana Hatchery are extremely low too. Measures must be taken to conserve salmon in the Copper River rather than allowing more harvest for all user groups.

Additionally, both sockeye salmon and king salmon are undergoing well-documented declines in their overall size. Smaller salmon tend to be less fertile—as a result, more escapement is needed in order to produce comparable returns.

PROPOSAL 29

5 AAC 01.620. Lawful gear and gear specifications.

Allow use of drift gillnets to harvest salmon for subsistence uses throughout Prince William Sound, as follows:

We seek to allow subsistence salmon fishing using drift gillnet gear throughout Prince William Sound concurrent with commercial fishing openers and on Saturdays from 6am until 10pm.



What is the issue you would like the board to address and why? The Prince William Sound legal subsistence gear type is tied to the legal commercial gear type in each fishing district. This gear type seems unnecessarily restrictive when you consider that the household harvest potential is already capped through maximum catch. Most subsistence users in PWS utilize gillnets and don't have the option to utilize seine gear in districts where seine is the legal commercial gear type. We would like subsistence users to be allowed access to the entire Prince William Sound with gillnet gear to support subsistence opportunity in areas where a harvestable surplus is available and underutilized by subsistence users.

PROPOSED BY: Native Village of Eyak

Comments:

No comments.

Prince William Sound and Upper Copper and Susitna Rivers Sport

PROPOSAL 30

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Extend single-hook, artificial fly regulations in the Gulkana River to include the area under the Richardson Highway Bridge, as follows:

5 AAC 52.023 (9) is amended to read:

(A) from June 1 – July 31, only single-hook, artificial flies, with a gap that does not exceed three-quarters inch between the point and shank, may be used in that portion of the Gulkana River downstream of [FROM] the upstream edge of the Richardson Highway Bridge to an ADF&G regulatory marker located approximately 500 yards downstream of the confluence with the Copper River; additional weight may only be used 18 inches or more ahead of the fly;

What is the issue you would like the board to address and why? A section of the Gulkana River downstream of the Richardson Highway Bridge allows for only single-hook, artificial flies to be used from June 1–July 31, while a section of the river upstream of the Richardson Highway Bridge allows for bait and artificial lures (including treble hooks) to be used from June 1–July

19. As written, the area under the bridge would fall under general area regulations (i.e., unbaited, single-hook, artificial lures) because it is neither upstream nor downstream of the bridge. Adding the language to include the area under the bridge in the artificial fly only area would reduce regulatory complexity and uncertainty on methods and means restrictions while fishing on the Gulkana River, specifically near the bridge, which is a popular fishing location.

PROPOSED BY: Alaska Department of Fish and Game



Comments:

We support Proposal 30 to extend single-hook, artificial fly regulations in the Gulkana River to include the area under the Richardson Highway Bridge. It seems to be a housekeeping proposal that was inadvertently left out of the regulation.

PROPOSAL 31

5 AAC 52.022. General provisions for season, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Increase the possession limit for sockeye salmon in the Upper Copper River, as follows:

In the upper Copper River, the sport Sockeye limit is three per day, three in possession. Elsewhere, like the Kenai, the possession limit is two daily bag limits. Especially in years with King restrictions, a Sockeye angler should be able to retain two daily bag limits, especially in areas like this where most anglers drive long distances or take multi-day float trips and would like to retain two daily bag limits without having to freeze the first day's limit.

What is the issue you would like the board to address and why? Align Sockeye possession limits with similar regions.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

Comments:

We oppose Proposal 31 to increase the sockeye bag limit to three in possession. The Upper Copper River. Sports Fisheries must be restricted during times of low escapement of sockeye salmon. Sockeye salmon returns have been met, but it is at the lower end of the 360,000-escapement range. The king salmon escapement goal was not met. Incidental catch of king salmon will occur. More king salmon may be damaged by catch and release.

PROPOSAL 32

5 AAC 52.023. Special provisions for season, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Allow harvest of rainbow trout 20 inches or less in a portion of the Gulkana River, as follows:

You can retain one rainbow/steelhead trout per day and only one in possession 20 inches or less from the tip of the nose to the fork of the tail. This should apply to all flowing waters of the Gulkana River excluding Middle Fork, from Dickey Lake to the confluence with the main-stem, where fishery should remain catch-release only.

What is the issue you would like the board to address and why? Currently rainbow/steelhead trout fishing is catch-and-release only throughout the entire Gulkana River drainage. I have been guiding on the Gulkana River for 40 years, and especially during the past 10 years, I have observed that rainbow/steelhead trout populations have grown dramatically. This creates problems because rainbow/steelhead trout prey on salmon row and smelt. Since 2015 the Gulkana Hatchery has been



unable to obtain sufficient brood stock to meet its egg-take goals. This raises concern about the sustainability of wild salmon stocks in the Gulkana drainage, particularly in smaller streams.

PROPOSED BY: Kirk Wilson

Sport fisheries should be allowed to retain one rainbow or steelhead trout per day, measuring 20 inches or less from the tip of the nose to the fork of the tail. The possession limit should be one. This should apply to all flowing waters of the Gulkana River excluding Middle Fork from Dickey Lake to the confluence with the main stem, where the fishery should remain catch and release only.

What is the issue you would like the board to address and why? Currently, rainbow/steelhead trout fishing is catch-and-release only throughout the entire Gulkana River drainage. Rainbow/steelhead trout populations have grown dramatically. Since 2015, the Gulkana Hatchery has been unable to obtain sufficient brood-stock to meet its egg-take goals. This raises concern about the sustainability of wild sockeye and Chinook stocks in the Gulkana drainage, particularly in smaller streams. You haven't been able to keep rainbow/steelhead for a long time. If you catch fish even with a fly, if the fish takes the fly deep or good on gill then they will die anyways. Keeping 1 rainbow/steelhead, especially one hooked badly will not hurt the population as they would die anyways. We also feel this will allow for more salmon eggs which will be good for the salmon populations.

PROPOSED BY: Copper Basin Fish and Game Advisory Committee

Comments:

We do not support Proposal 32. We do not support sport-fish retention of trout until the population can withstand it because we do not want to lose subsistence harvest opportunities for trout. If sport fishers retain too many trout from the Gulkana River drainage, it is possible that incidental retention of rainbow/steelhead trout by fishwheel users may be restricted.

PROPOSAL 33

5 AAC 52.023. Special provisions for season, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Allow harvest of rainbow trout 18 inches or less in the Gulkana River, as follows:

There are approximately 13,000 rainbow trout in the Gulkana with 7,000 greater than 18 inches. Allow anglers to retain 1 rainbow trout under 18 inches. If not on the entire Gulkana, then at least above the "No bait" marker on the mainstem above the West Fork confluence, an area of high abundance usually only accessible by floaters, who should have the opportunity to eat a normally hooked rainbow trout instead of releasing it dead or dying.

What is the issue you would like the board to address and why? Inability to retain any Rainbow Trout in the Gulkana River, even those fish caught on King gear that have died, or will likely die, upon release.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee



Comments:

See comments under Proposal 32.

PROPOSAL 34

5 AAC 52.023. Special Provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Remove the 14-inch size limit for Gulkana River Arctic grayling, as follows: 5 AAC 52.023 is amended to read:

(9) (C) in waters upstream of Paxson Lake and those waters of Paxson Lake within a 100-yard radius of the mouth of the East Fork at the north end of Paxson Lake upstream to Summit Lake,

(iii) the bag and possession limit for Arctic grayling is two fish, with no size limit[OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH];

(D) in all flowing waters from 100 yards upstream from the narrows at the Paxson Lake outlet downstream to the confluence with the Middle Fork;

(iii) [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, WITH NO SIZE LIMIT OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(A) in all waters of the Middle Fork of the Gulkana River from the outlet of Dickey Lake to an ADF&G regulatory marker located approximately three miles downstream, including Hungry Hollow Creek and Twelve Mile Creek,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, WITH NO SIZE LIMIT OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(B) in all other waters of the Middle Fork of the Gulkana River not specified in (E) of this section,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, WITH NO SIZE LIMIT OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(C) all waters downstream of the confluence of the Middle Fork,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(D) in all flowing waters of the West Fork of the Gulkana River upstream of an ADF&G regulatory marker located one-half mile upstream of the confluence of the West Fork and mainstem of the Gulkana River,

- [THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH, OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(18) in Paxson Lake,



[(E) THE BAG AND POSSESSION LIMIT FOR ARCTIC GRAYLING IS FIVE FISH WITH NO SIZE LIMIT, OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH;]

(20) in the Summit Lake drainage,

(F) the bag and possession limit for Arctic grayling is two fish, **with no size limit**[OF WHICH ONLY ONE MAY BE 14 INCHES OR GREATER IN LENGTH];

...

What is the issue you would like the board to address and why? Based on a study of Gulkana River Arctic grayling, a one fish over 14-inch size restriction was imposed in 1989 to preserve the size structure of the Arctic grayling populations in that system. Subsequent assessments have been conducted since that time, including a comprehensive study completed in 2019. Based on these studies and recent harvest trends, it was determined that the 14-inch restriction is no longer needed to maintain the desired population size and structure.

PROPOSED BY: Alaska Department of Fish and Game

Comments:

We support Proposal 34 to remove the 14-inch size limit for Gulkana River Arctic grayling.

Restriction on size is no longer needed in the Gulkana River system as long as sportsmen keep grayling and do not release them back into the water.

PROPOSAL 35

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Amend bag and possession limits for Arctic grayling and methods and means in Moose Creek, as follows:

Moose creek: sport anglers may use baited or unbaited single hook artificial lures. Bag limit is 2 and 2 in possession. Season is open year-round. Only catch and release fishing is allowed from April 1 to May 31.

What is the issue you would like the board to address and why? Fishing regulations for Moose Creek in the Copper River Basin do not provide for the protection of the Grayling spawning run. What was once a plentiful fishery has noticeably declined. Along with that loss, is the loss of the symbiotic relationships between Grayling and Mink/Otter, King Fisher, Seagulls and Eagles that has altered where this wildlife is no longer seen hunting the creek. Sport fishing in Moose Creek by youth and adult is now seldom participated in.

Adequate management of this fishery includes (1) Creation and implementation of fishing regulations for Grayling that protect the spawning run and provide for healthy future populations of Grayling in Moose Creek in the Copper River Basin. And, (2) Restoration or reintroduction of Grayling in Moose Creek, in the Copper River Basin, allowing for recreational fishing and the return of the symbiotic relationship between Grayling and other wildlife.



PROPOSED BY: Bonnie McLeod

Comments:

We oppose Proposal 35 to amend bag and possession limits for arctic grayling and methods and means in Moose Creek in the Copper River Basin. We do not support the catch and release of graylings from April 1 to May 31 or at any other time.

Additionally, the culverts that were installed a few years ago have allowed fish passage more readily. Graylings are not holding up near the older, smaller culvert as they used to. It was the culvert that allowed more graylings to linger in one spot, which made it appear that there were more graylings than there actually were.

PROPOSAL 36

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Increase the bag and possession limit of lake trout in Crosswind Lake, as follows: 3 lake trout one over 30" per year in Crosswinds Lake

What is the issue you would like the board to address and why? Overabundance of lake trout in Crosswinds Lake. PWSA has been planting up to 10 million sockeye salmon smelt each year over 20 years. This has increased the trout population 10-fold & in some cases the big fish are starting to get skinny. Small fish are taking over lake. There May need to be more liberal limits in the future or big fish will start to diminish due to competition from small fish. This number of trout is starting to diminish the smelt fry to the point the Gulkana Hatchery can't meet their egg take goals since 2015. If the stocking doesn't keep smelt coming at a regular rate you will see skinny lake trout in all size ranges & big fish could starve out. It only makes good since to let fishers take more fish when there is so many fish available. This regulation will promote a healthy sport fishery.

Due to cost of flying there are less and less fishermen participating in this fishery.

PROPOSED BY: Kirk Wilson

Comments:

We support Proposal 36 to increase the bag limit and possession limit of lake trout in Crosswind Lake to three lake trout over 30" per year. It appears that small fish are overeating food sources in Crosswind Lake, larger lake trout may not be able to eat to stay healthy.

Commercial Finfish

Copper River King Salmon Management Plan

PROPOSAL 41

5 AAC 24.361. Copper River King Salmon Management Plan. Repeal mandatory closed waters from the Copper River King Salmon Management Plan, as follows:

Repeal mandatory inside commercial closures for any statistical week from regulation. Repeal mandatory commercial salmon fishery inside waters closures in the Copper River King Salmon



Management Plan, as follows: Draft regulatory language: 5 AAC 24.361. Copper River King Salmon Management Plan.

(b) **Repealed xx/xx/20.** [IN THE COMMERCIAL FISHERY, DURING THE STATISTICAL WEEKS 20 AND 21, THE COMMISSIONER MAY NOT OPEN MORE THAN ONE 12-HOUR FISHING PERIOD WITHIN THE INSIDE CLOSURE AREA OF THE COPPER RIVER DISTRICT DESCRIBED IN 5 AAC 24.350(1)(B).]

What is the issue you would like the board to address and why? Alaska Department of Fish and Game (ADFG) has the authority to manage fisheries and has demonstrated its ability to do so effectively; therefore, mandatory closures are unnecessary. There has been an upward trend in the Copper River Chinook run in recent years further making mandatory closures unnecessary. ADFG has opposed mandatory closures on sport fisheries as these closures are mandated even when the circumstances of a current year's run strength and timing do not require them. This proposal does not suggest eliminating the inside closure tool as it is warranted, but rather suggests the elimination of this mandatory language.

PROPOSED BY: Cordova District Fishermen United

Comments:

We strongly oppose Proposal 41 to repeal mandatory inside commercial closures for any statistical week from regulation. In 2020 the king salmon escapement goal was not met, and in 2020 the sockeye salmon escapement goal was barely met. Now is not the time to repeal mandatory closures.

The king salmon conservation measure that the proposers are seeking to repeal has only been in place since 2011. Given the stark declines in king salmon returns during the past decade, this is an inappropriate time to repeal this conservation measure.

Sockeye salmon should be considered a Stock of Concern by the Alaska Board of Fisheries. Less wild stock- (sockeyes) and enhanced Gulkana hatchery fish are returning to spawn each year. In 2020, 503,000 sockeye salmon returned, and 22,000 king salmon returned to spawn.

STATEWIDE ALL SHELLFISH (EXCEPT PRINCE WILLIAM SOUND, SOUTHEAST AND YAKUTAT) AND PRINCE WILLIAM SOUND SHRIMP ONLY

42 proposals

Miscellaneous sport

PROPOSAL 234

5 AAC 75.XXX. New Section.

Require inseason reporting of non-resident sport fish harvest and effort, as follows:

All non-resident sport fisherman must keep track of a catch and harvest record of all species finfish and shellfish regardless of annual limit status of the species.



What is the issue you would like the board to address and why? The Ketchikan Indian Community Tribal Government believes nonresident sport fishermen and their fishing activities are severely data deficient, which has a negative impact on the management of all fisheries in the state of Alaska. It is imperative for these fishermen to report their catch and harvest so that management of our fisheries can use them for future population estimates of the fish abundance and distribution.

PROPOSED BY: Ketchikan Indian Community

Comments:

We support Proposal 234 to require sport fishermen to report their catch of fish in Alaska. All other users have to report, sports fisheries are not required to do so. Valuable fisheries information could be applied by fisheries biologists if they had real-time information on harvest of salmon caught.

PROPOSAL 235

5 AAC 39.975. Definitions; and 5 AAC 75.995. Definitions.

Modify the definition of domicile and include in sport fishing regulations, as follows:

“**“domicile”** means the location of a person’s primary residence which allows the person to meet the eligibility requirements for the Alaska Permanent Fund Dividend as defined in AS 43.23.005 (a)(1-7); evidence of domicile includes:

- (C) a statement made to obtain a license to drive, hunt, fish, or engage in an activity regulated by a government entity;
- (D) an affidavit of the person, or of another person who may know of that person’s domicile;
- (E) the place of voter registration
- (F) the location of a residence owned, rented, or leased;
- (G) the location where household goods are stored;
- (H) the location of a business owned or operated;
- (I) the residence of a spouse or minor children or dependents;
- (J) a government to which a tax is paid;
- (K) evidence indicating whether the person has a claimed residence in another location for the purpose of obtaining benefits provided by the government in that location;”

AS 43.23.005. Eligibility.

(L) An individual is eligible to receive one permanent fund dividend each year in an amount to be determined under AS 43.23.025 if the individual

- applies to the department;
- is a state resident on the date of application;
- was a state resident during the entire qualifying year;
- has been physically present in the state for at least 72 consecutive hours at some time during the prior two years before the current dividend year;
- is

(A) a citizen of the United States;

(B) an alien lawfully admitted for permanent residence in the United States;



- (C) an alien with refugee status under federal law; or
- (D) an alien that has been granted asylum under federal law;
- (6) was, at all times during the qualifying year, physically present in the state or, if absent, was absent only as allowed in AS 43.23.008; and
- (7) was in compliance during the qualifying year with the military selective service registration requirements imposed under 50 U.S.C. App. 453 (Military Selective Service Act), if those requirements were applicable to the individual, or has come into compliance after being notified of the lack of compliance.

What is the issue you would like the board to address and why? Alaska has an increasing population of seasonal residents who come to Alaska only during the fishing season or hunting seasons to take advantage of the resources of Alaska. They reside most of the year in another state. Many of these seasonal residents have never been domiciled in Alaska for 12 consecutive months. Some tow or drive an RV to Alaska and lease an area to park their RV on during their temporary stay in Alaska. Some have family and spouses who do not travel with them to Alaska during their visit.

The issue is some of these visitors to Alaska are obtaining Alaska resident hunting and fishing licenses and benefits. They are obtaining an Alaska driver's license and registering to vote in Alaska. They are registering their vehicles in Alaska which has some of the lowest vehicle registration fees in the USA. If they are claiming a resident of a qualified area of the state, they are also permanently registering their vehicle in Alaska and never have to pay a registration fee on that vehicle again.

In past practices of the Alaska Court System, if the person is charged with a false statement on an ADF&G resident license permit, the definition of domicile continually keeps being the deciding factor in court decisions. A person may leave suitcases in a room of a house in Alaska. The court system has determined that this is the start of a person's domicile and after 12 consecutive months, they are eligible for an ADF&G resident license or permit. If a person maintains a yearly space rent at an RV park, that space rent qualifies as a person's domicile. The Alaska Court System does not consider paying resident taxes in another state as a benefit.

So, in short reference, a resident of the lower 48 can take vacation time from their job. They can tow their RV to Alaska to their RV park which they have a year lease on a space. They can hunt, sport fish, and subsistence fish for a short time as an Alaska resident. They then can return back to their year-round residence with freezers full of Alaskan salmon, halibut, and moose meat to their spouse and family in the lower 48. They do intend to visit their year-round leased RV space year after year and repeat the cycle.

Another scenario is a person could come up to a lodge for a vacation in Alaska. During their vacation, they buy a cabin and return almost yearly. They do not buy a resident fishing license in the state which they work and reside in that state for 11 months out of the year. They intend to return most years to the cabin in Alaska. They purchase a resident ADF&G sport fishing license and obtain an Alaska subsistence salmon permit. The person is eligible because they are domiciled in Alaska according to the current definition and the Alaska Court System. When charged for giving a false statement on an ADF&G resident license, the person is found not guilty by the Alaska Court System because the person has been domiciled in Alaska for 12 consecutive months and intends to return to Alaska.



Most residents in Alaska do not comprehend how common of a situation they have in their communities concerning seasonal residents obtaining ADF&G resident benefits. The East Prince of Wales Advisory Committee purchased the ADF&G licensing list for their represented communities. The licensing list showed that several seasonal residents are in fact purchasing resident ADF&G licenses or have a Permanent Identification Card. Some of these seasonal residents can't even correctly pronounce the name of the community they claim to reside in or spell the name correctly. Mostly all of these seasonal residents will use a mail forwarding service such as the UPS Store, a neighbor, or they have a USPS Postal Box with all mail forwarded to their residence in another state.

The definition of "Domicile" under 5 AAC 39.975 and creating a definition of "Domicile" 5 AAC 75.995 as well as other respective applicable administrative codes, needs to be changed to prevent non-residents from obtaining resident benefits. True residents of Alaska are very familiar with the Alaska Permanent Fund and the requirements to be eligible to receive a yearly dividend. Changing the ADF&G Administrative Code's definition of "Domicile" to include meeting the requirements of obtaining an Alaska Permanent Fund dividend will clarify any confusion.

Alaskans will still be able to retire and visit a warm place during the winter months when this definition change is adopted. Alaska will obtain additional funds not only from the increased non-resident license sales, but also from the 3 to 1 dollar matching federal funds through the Dingell-Johnson and Pittman-Robertson funds. Currently a resident sport license costs \$29. Alaska would also receive \$87 of federal matching funds. Total revenue to the state is \$116 for a sale of a resident sport fishing license. If a non-resident sport license is purchased at \$145, Alaska would also receive \$435 in matching federal funds. Total revenue to the state is \$580 for the sale of an annual non-resident sport fishing license.

This change of the definition of "Domicile" will ensure the fish and game resources are for Alaskans. Seasonal and often referred locally as "fake" residents will most likely not meet the definition requirements and have to purchase non-resident licenses in Alaska. The increased licenses revenue will benefit Alaska at a much-needed time. The fish and game populations will be better protected for the residents of Alaska as a seasonal "fake" resident will no longer qualify for resident bag limits or subsistence rights.

PROPOSED BY: East Prince of Wales Fish and Game Advisory Committee

Comments:

We do not support Proposal 235 as written, nor is it proper to require such unnecessary personal information to apply to sport fish in Alaska. Individuals' have a right to privacy; their personal information should not be given out in order to fish in Alaska.

Respectfully,

A handwritten signature in black ink, appearing to read "Nicholas Jackson".

Nicholas Jackson, Chair
Ahtna, Incorporated
Customary & Traditional Committee

Submitted By
ALAN KAPP
Submitted On
11/3/2021 10:13:48 AM
Affiliation



PC004
1 of 1

Opposed to Proposal 43.

We had a heated allocation argument at a Board of Fish meeting in Valdez many years ago. An allocation compromise was reached then between the three gear groups, drift and set net gillnet fishermen and the purse seine fishermen. To consider any change of the PWS allocation now is not acceptable.



November 11, 2021

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

RE: Oppose proposals 49 – 55, PWS BOF meeting

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (board) meeting scheduled for Nov 30 – Dec 6 in Cordova.

The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including three shorebased processors located in Cordova and Valdez. The Alaska Fisheries Development Foundation (AFDF) is a non-profit organization that represents harvesters, processors, and support sector businesses with a mission to identify common opportunities in the Alaska seafood industry and to develop efficient, sustainable outcomes that provide benefits to the economy, environment, and communities.

Alaska's unique salmon fisheries enhancement program is critical to the stability of the fishery-dependent communities and processing infrastructure in Prince William Sound, as well as the livelihoods of and recreational opportunities for thousands of Alaskans. **PSPA and AFDF oppose proposals 49 – 55** which serve to reduce hatchery production for no identified specific benefit but would cause direct harm to thousands of fishing and processing businesses, communities, and recreational, personal use, and subsistence fishermen.

Alaska's salmon hatcheries contribute nearly a quarter of the value of our state's salmon harvests and generate \$600 million in economic output, with impacts throughout the economy. More than 16,000 fishermen, processing employees, and hatchery workers can attribute some portion of their income to Alaska's salmon hatchery production. In addition, more than 270,000 hatchery-origin salmon are harvested annually in sport and related fisheries, and these numbers are considered conservative (McDowell, 2018). Prince William Sound hatcheries alone account for 2,200 annualized jobs, \$104 million in labor income, \$69 million in ex-vessel value to fishermen, and \$316 million in total annual economic output.¹ Prince William Sound and Copper River hatcheries have supplied over 1 million fish to Alaskans who participate in personal use and subsistence fisheries in the area since 1999.

Hatchery pink and chum salmon are crucial for Prince William Sound processors, as well as processors in other regions, because they provide the volume and stability needed to keep plants operating. In this

¹Economic Impacts of Alaska's Salmon Hatcheries, McDowell Group, 2018. The number of jobs is an annualized estimate; the number of people who earn some income from the harvest of hatchery salmon is several times the annual average.



way seafood processors remain viable and provide markets not just for salmon fishermen, but for all other commercial fisheries as well. Processors and harvesters have made significant long-term investments in processing plants and their fishing businesses, respectively, based on fisheries enhancement programs and permitted production decisions. In addition, tenders, support vessels, support businesses, transportation companies, sportfish businesses, and community governments (through both state and local fish taxes) are dependent on the direct and indirect economic activity that the hatchery programs provide.

The State of Alaska established the hatchery program in 1971—at a time when Alaska’s salmon returns were at historic lows—to provide for more stable salmon harvests and bolster the economies of coastal communities that would not otherwise have viable economies. Since the beginning, the hatchery program was designed to supplement natural reproduction, not replace it, and to minimize negative interactions with naturally occurring populations of salmon. A testament to this design is that wild pink and chum salmon returns in these regions greatly improved since the inception of the program, with one of our most robust wild pink salmon runs occurring in PWS this year and record runs in 2013 and 2015. PSPA supports a strong hatchery program consistent with the Department and the Board’s sustainable salmon policy.

Proposals 49 – 53 should be rejected because they seek to reduce hatchery production through direct action by the Board, and they unnecessarily move policy and management principles into regulation and make it impossible to adapt to new information as managers deem necessary. These proposals go well beyond incorporating the Policy for the Management of Sustainable Salmon Fisheries in regulation, as they regulate reductions in hatchery production (penalties of egg take reduction) every year should the proportion of hatchery salmon straying into wild-stock streams exceed a yet to be defined rate of straying. And until defined, the proposed regulation would use an arbitrary threshold of 2%. The 2% stray rate in the proposals was referenced in a 1994 regional planning team report (PWS/Copper River Phase III Comprehensive Salmon Plan) with the qualification included that it was not well supported, did not correlate to straying rates for wild pink salmon, and that further research was necessary. It is not used in current fisheries management, reflected in the ADFG genetic policy, or adopted in fisheries regulation, and should not be used now without basis. Even determining whether a specified straying percentage can be met each year for each species is unreasonable and will require significant research and data collection which is unfunded.

Proposals 54 and 55 should also be rejected because they would reduce chum and pink salmon hatchery production unnecessarily and significantly harm Alaska salmon users of all sectors, despite a lack of evidence that Alaska hatcheries are causing harm to wild fish production. PWS hatchery production has remained stable since the early 1990s, and North Pacific Anadromous Fish Commission data estimates PWS hatchery pink salmon comprise roughly 7% of the total biomass of adult and juvenile pink salmon in the North Pacific. Straying occurs naturally in both wild and hatchery-origin pink salmon stocks and attempts to determine acceptable levels of straying should consider a genetic propensity to stray, recognition that the stock, species, and environmental conditions influence stray rates, and produce credible research on the impact of straying on the productivity of wild stocks. These are exactly the types of questions the state’s Alaska Hatchery Research Project is addressing. This long-term project is an example of the type of robust studies needed to understand impacts, focused primarily on the extent and annual variability in straying of hatchery pink salmon in Prince William Sound (and chum salmon in PWS and Southeast Alaska) and the impact of that straying on the productivity of wild stocks. This project was the State of Alaska’s commitment to and investment in research to ensure hatchery production is compatible with sustainable productivity of wild stocks. We appreciate the board’s



commitment to continually reviewing both the process and the best available scientific information through the Hatchery Committee, to inform the board and the public of wild-hatchery interactions and impacts.

Given the dependence on the hatchery program and the overwhelming public support for the program conveyed at your July 2018 meeting, the October 2018 work session, and subsequent Hatchery Committee meetings, we look forward to the board again convening the Hatchery Committee in March 2022 to continue to review components of the program and the ongoing results of the current research project. At this time, please reject proposals 49 – 55, given they have no scientific justification and serve to directly harm Alaska’s salmon dependent businesses, recreational, personal use, and subsistence fishermen.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "C. Barrows".

Chris Barrows
President
Pacific Seafood Processors Association

A handwritten signature in black ink, appearing to read "Julie Decker".

Julie Decker
Executive Director
Alaska Fisheries Development Foundation



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial fisherman out of Valdez. Commercial salmon fishing is, and has been for three generations, the primary source of income for my family. We currently have four seiners which support four families directly. In addition to the families of the captains, we each support the families of three workers per boat. Commercial salmon fishing in the Prince William sound is not only a sustainable fishery, but the region provides a sustainable livelihood to countless families.

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,

Alexander Lopez
Fv.laissezfaire@gmail.com
(910) 228-3476



From: [Alexander Lopez](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Prince William Sound Gear Proposal Comment
Date: Thursday, October 15, 2020 9:18:31 AM

Meeting: Working Meeting on 10/15/20

Name: Alexander (Alex) Lopez

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

Email: fv.laissezfaire@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.

Simply put, this proposal makes the stacked second permit too much of an advantage over a single permit. Additionally, our problem boils down to fleet efficiency and fleet size limiting fishing time and area due to how quickly we can completely fish out an area. Though this proposal would likely shrink fleet size which is a good thing, it would also make us more efficient catchers and therefore exacerbate our fishing management issues.

Re: 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. Overall this is a modest proposal with limited downside, therefore it has my full support.

--

Best,
Alex Lopez

Submitted By
Andrea
Submitted On
11/7/2021 6:18:13 PM
Affiliation



PC007
1 of 1

Proposal 7: Oppose

Proposal 8: Oppose

Proposal 9: Oppose

Proposal 10: Oppose

Proposal 11: Oppose. This would be very dangerous.

Proposal 12: Oppose

Proposal 13: Oppose

Proposal 14: Oppose

Proposal 15: Oppose

Proposal 16: Oppose. This would be very dangerous for people navigating the ever changing river.

Proposal 17: Oppose

Proposal 19: Oppose

Submitted By
Andrew Couch
Submitted On
11/15/2021 3:08:49 PM
Affiliation
subsistence dip netter, Matanuska Valley AC member, sport user



PC008
1 of 1

Phone
9077462199
Email
fishing@fish4salmon.com
Address
PO Box 155
Palmer, Alaska 99645

Chairman Carlson-Van Dort and Members of the Alaska Board of Fisheries, My name is Andrew (Andy) Couch and I am writing you concerning the shortages of king salmon and sockeye salmon allowed to migrate up the Copper River drainage. These shortages of salmon have created multiple times when upriver user groups (subsistence, personal use, and sport) have been restricted and closed to king and / or sockeye salmon harvest. Two years in particular come to mind 2018 with a large shortage of sockeye salmon, and 2021 (this past summer) when subsistence, personal use, and sport user groups were all closed to king salmon harvest. The commercial fishery was severely restricted in 2018, however in 2021 when all upriver user groups were closed to king salmon harvest the commercial fishery experienced some period and area closures early in the season, but was allowed to continue harvesting king salmon long after all king salmon harvest was closed for other user groups. The escapement goal is estimated to have been met, but when there is a harvestable surplus of king salmon, all user groups should have a reasonable opportunity to share in the harvest as common use identified in the State Constitution. For several years now the Alaska Department of Fish and Game has been saying that there is an ocean problem with king salmon production, and it is my belief that allowing more king salmon into the river from the ocean should be the highest priority -- otherwise each of the inriver user groups with smaller and defined daily or season harvest limits are restricted much more severely than the commercial fishery (which starts significantly earlier than all inriver user groups and has no harvest limits on the number of king salmon they are allowed to take). 1. Please consider the concept of an inriver goal or some type of optimum goal which would ensure adequate numbers of king salmon and also sockeye salmon inriver for inriver user groups -- before commercial harvesting takes most of the harvestable surplus. Proposal 5 could be used as a vehicle to address an inriver goal that provides harvestable surplus king salmon for upriver user groups. Although the low end of an inriver range may need to be hopped up to about 30,000 king salmon to provide for current inriver harvest levels when adequate numbers of king salmon have been allowed to pass upriver the top end of the range could be set or adjusted by the Board with ADF&G consultation in such a manner as to provide the most solid and reliable king salmon production on an annual basis. I support the concept of proposal 5 used in this manner. A similar adjustment to inriver sockeye salmon goal could also be appropriate for managing the commercial fishery. 2. Some scientists believe part of the reason for lower or sporadic returns of both wild Copper River king and sockeye salmon maybe caused by increased competition with hatchery produced salmon (in Prince William Sound the largest numbers of hatchery produce salmon have been pink and chum salmon). The state's head fisheries scientist has gone on record saying that correlation is not necessarily causation -- however in following the state's Wild Fish Policy and Sustainable Salmon Fisheries Policy, I believe it would be best for the State of Alaska and the majority of users if the board followed the Precautionary Principle and if an error were to be made that error should be made on the side of maintaining or rebuilding wild salmon stocks. Proposals 49, 50, 51, 52, 53, 54, and 55 all address the issue of operating fish stocking operations in a manner that sets limits to protect wild salmon populations. For that reason I support the concept of each of these proposals, and hope that you will also. 3. A large number of far upriver bound king salmon tend to stage at or near the Copper River mixing zone with saltwater early in the season and are vulnerable to harvest while staging and especially if river break up is a bit later than normal. The board previously made a regulation to restriction to the amount of commercial fishing in this area during May. Proposal 41 seeks to remove this regulation -- so I oppose proposal 41 as written. Considering the statewide downturn in king salmon production - that has continued more than a decade - I would suggest that a more appropriate board action in my opinion would be to either close May commercial fishing and start the fishery either June 1 (when the inriver subsistence fishery starts) or June 7 when the Chitina personal use fishery currently starts). Another option would be to restrict all commercial fishing near the Copper River / saltwater confluence in May to outside the barrier islands or a more conservative king salmon fishing zone. Perhaps another way to reduce king salmon harvest while still allowing sockeye harvest would be to make net adjustments -- perhaps 29 inch depth as sometimes used in Upper Cook Inlet and / or reduce gear to up to 5 1/2 inch gillnet or less which would harvest even very large sockeye, but likely pass more of the larger king salmon upriver. 4. The significance of the shortage of salmon upriver can be seen in the number of upriver proposal seeking to reduce subsistence or personal use dip netting opportunities in one way or another. Proposals 6 -- 17 would all restrict or make either subsistence or personal use dip netting more difficult in one way or another to the benefit of one or more other upriver user groups. For that reason I oppose proposals 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17. Proposal 17 would create different annual harvest limits for different subsistence gear users -- I do not support this idea -- however aligning the fish wheel annual king salmon harvest limit to what is allowed in the dip net fishery would put additional king salmon upriver. While not in the proposal I would not be opposed to that concept. 5. Proposal 19 would severely reduce the allowable harvest in the Chitina Subdistrict personal use fishery -- rather than reducing harvest this would likely only shift effort to the Glenallen Subdistrict subsistence fishery, wherefore I oppose proposal 19.

Thank you for considering my thoughts,

Andrew N. Couch

Submitted By
Andrew Eckley
Submitted On
11/14/2021 3:16:04 PM
Affiliation
Area E drift fisherman



PC009
1 of 3

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Address
Pob 2014
Cordova, Alaska 99574

Proposal 5 oppose 6 support 7 support 9 support 10 support 18 oppose 19 support 20 support 21 oppose 22 oppose 41 support 44
support 45 oppose 46 support 47 oppose 48 oppose 49 oppose 50 oppose 51 oppose 52 oppose 53 oppose 54 oppose 55 oppose 58
oppose



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 and am a commercial fisherman.

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,

Andrew Eckley
Ketchem2013@gmail.com
(907) 565-9984



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:05:37 PM
Affiliation
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Proposal #5 - OPPOSE

ADFG has not supported an escapement goal of up to 40,000 Chinook salmon. In fact they have recommended lowering the goal below the current sustainable escapement goal of 24,000 in recent years. I ask the Board to please weigh heavily the Departments recommendations over a biased sport fishing association's request.

I urge the board to please REJECT Proposal #5



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:07:53 PM
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Proposal #7 - SUPPORT

A commercial enterprise should NOT capitalize on a subsistence fishery. It seems that the board would agree given how Cordovan's subsistence fishery is managed.

I urge the board to please SUPPORT Proposal #7



Submitted By
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Submitted On
11/15/2021 5:10:39 PM
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Proposal #17 - SUPPORT

As a Cordova resident I am allowed to harvest 10 salmon for subsistence. While I could certainly eat more than my personal allotment in one year I would find it difficult to eat 30+ fish in one year. Please keep the fishery honest by limiting permits to a reasonable harvest limit.

I urge the board the please SUPPORT Proposal #17



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11/15/2021 5:13:20 PM
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Proposal #18 - OPPOSE

The proposal in itself is conflicted. Asking the board to make dip-net harvesting easier and also stating that it would not increase harvest amounts.

An easier harvest will reflect a larger harvest.

I urge the board to OPPOSE Proposal #18



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:14:27 PM
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Proposal #19 - SUPPORT

We ALL have a responsibility to keep this resource sustainable for generations to come. This needs be reflected in the management of ALL user groups to be successful. For the longterm health of our salmon stocks this is an obvious step forward.

I urge the board to SUPPORT Proposal #19



Submitted By
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Submitted On
11/15/2021 5:15:29 PM
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Proposal #21 - OPPOSE

Chinook returns over the last five years have been too low to begin loosening restrictions on harvest.

I urge the board to OPPOSE Proposal #21



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:16:48 PM
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Proposal #28 - OPPOSE

Until we have consistent escapement goals for all species met down river, no harvest limits should be increased. Furthermore, an increase in subsistence limits opens the door to commercial guides and outfitters to capitalize on the resource outside of commercial fishing opens the way we have seen in areas up river.

I urge the board to please OPPOSE Proposal #28



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:18:10 PM
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Proposal #29 - OPPOSE

Drift gillnets can be very effective and, with that, very lethal. In the Prince William Sound (PWS) salmon can run in large schools well over the subsistence harvest limits. Allowing drift gillnets in the PWS subsistence fishery will undoubtedly result in the irresponsible and unnecessary death of countless fish.

I urge the board to please OPPOSE Proposal #29



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:20:30 PM
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Proposal #38 - SUPPORT

We ALL have a responsibility to keep this resource sustainable for generations to come. This needs be reflected in the management of ALL user groups to be successful. For the longterm health of the coho stocks this is an obvious step toward progress.

I urge the board to please SUPPORT proposal #38



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:21:37 PM
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Proposal #41 - SUPPORT

Fish Runs should be managed by current data as well as past trends. Removing mandatory closures allows ADFG to manage each run accurately.

I urge the board to SUPPORT Proposal #41

Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:29:36 PM
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PC010
11 of 15

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Proposal #50 - OPPOSE

Before taking the statistics stated in this proposal at face value I would urge the board to read the ADFG publication of 2018 from which they were derived.

Special Publication No. 18-11

Observations of Pink Salmon Hatchery Proportions in Selected Lower Cook Inlet Escapements, 2014–2017

The Pioneer Alaskan Fisheries Inc. have latched onto two statistics to push their agenda. The 1st is an obvious stat strategically stated to raise the eyebrows of those reading and the 2nd a blatant misrepresentation of the data presented by the publication.

The 1st is the percentage of AFK otoliths found in relation to the total PWS otoliths surveyed in the study by year. Well, it's obvious that AFK would have higher numbers than the other PWS hatcheries since they are much closer to LCI streams than any other PWS hatchery. Please lower your eyebrows.

The 2nd statistic referenced is about PWS hatchery fish being found in abundance (87.4% (31.6% AFK)) in Barabara Creek in 2014 (the first year of this study). In the study ADFG took 2-3 samples from 8 Lower Cook Inlet streams per year from 2014-2017. They studied the otoliths for thermal marks correlated to PWS and LCI hatcheries, then published the data. In the following 3 years PWS hatchery otolith marks were found in Barabara creek at 12.6% (1.4%AFK) in 2015; 16.8% (6.5% AFK) in 2016; and 18.3% (4.2% AFK) in 2017.

If you read the "Discussion" section of the ADFG study cited, in the first paragraph they state; "limitations in survey design narrow the scope to descriptive statistics of the samples only" as well as; "An analysis that yields estimates of the proportion of hatchery fish in the escapement for any given stream, or all LCI streams in general, is not yet possible."

The publication concludes with a 3 step plan for future surveys: "1) define the question(s) to answer, 2) establish project goal(s) and objective(s) to achieve, and 3) **refine sample design and data analysis.**"

Thus clearly implying that these early statistics NOT be used to develop regulation.

I suppose the Pioneers of their own pockets may still use these stats to garner shock value for their proposals but please redact such statistics until you have read the publications where they are derived.

The proposal asks for lowering hatchery production "to address the variables and recognize and admit the damage we are exerting". But lowering production would only introduce more variables to the ongoing studies that have already been designed to create accountability

and higher efficacy of our hatcheries.



PC010
12 of 15

This proposal will push the ongoing efforts to have accountability and limit straying of hatchery fish off-course and the Pioneer Alaskan Fisheries Inc should be discredited for dishonestly using outlier statistics to push their "noble" self interests.

I urge the board to please OPPOSE Proposal #50

Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:31:01 PM
Affiliation
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PC010
13 of 15

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Proposal #51

If you read my comments on Proposal 50 i'll save you the time of reading it all over again here as it is the same.

The proposal asks for lowering hatchery production "to address the variables and recognize and admit the damage we are exerting". But lowering production would only introduce more variables to the ongoing studies that have already been designed to create accountability and higher efficacy of our hatcheries.

This proposal will push the ongoing efforts to have accountability and limit straying of hatchery fish off course and the Pioneer Alaskan Fisheries Inc should be discredited for dishonestly using outlier statistics to push their "noble" self interests.

I urge the board to please OPPOSE Proposal #51

Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:32:37 PM
Affiliation
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PC010
14 of 15

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Proposal #52

If you read my comments on Proposal 50 i'll save you the time of reading it all over again here as it is the same.

The proposal asks for lowering hatchery production "to address the variables and recognize and admit the damage we are exerting". But lowering production would only introduce more variables to the ongoing studies that have already been designed to create accountability and higher efficacy of our hatcheries.

This proposal will push the ongoing efforts to have accountability and limit straying of hatchery fish off course and the Pioneer Alaskan Fisheries Inc should be discredited for dishonestly using outlier statistics to push their "noble" self interests.

I urge the board to please OPPOSE Proposal #52



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:33:52 PM
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Proposal #53

If you read my comments on Proposal 50 i'll save you the time of reading it all over again here as it is the same.

The proposal asks for lowering hatchery production "to address the variables and recognize and admit the damage we are exerting". But lowering production would only introduce more variables to the ongoing studies that have already been designed to create accountability and higher efficacy of our hatcheries.

This proposal will push the ongoing efforts to have accountability and limit straying of hatchery fish off course and the Pioneer Alaskan Fisheries Inc should be discredited for dishonestly using outlier statistics to push their "noble" self interests.

I urge the board to please OPPOSE Proposal #53

Submitted By
Andy Tresness
Submitted On
11/12/2021 5:24:41 PM
Affiliation



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1 of 4

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I appose proposal #5. ADFG has measures in place to responsibly manage the king salmon runs. Additional management in the interest of sport fisherman is not in the best interest of the comemmercial fisherman who depend on these fish to make a living and provide healthy sustainable food to communities across the country. Thank you, Andy Tresness

Submitted By
Andy Tresness
Submitted On
11/12/2021 5:33:51 PM
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2 of 4

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I support proposal #6. I believe increasingly detailed tracking of subsistence harvests is in the best interest of everyone dependent on the recourse for food or commercial interest. Thank you Andy Tresness

Submitted By
Andy Tresness
Submitted On
11/12/2021 5:40:33 PM
Affiliation



PC011
3 of 4

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I support proposal #9. We need to do our best to protect spawning salmon to ensure the recourse remains strong for all who depend on it.
Thanks, Andy Tresness

Submitted By
Andy Tresness
Submitted On
11/13/2021 9:38:05 AM
Affiliation



PC011
4 of 4

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I support proposal #19. When runs are small and fish are few. The responsibility of measured harvests should be shared. The burden should not be placed strictly on the commercial fisherman. Thank you, Andy Tresness

Submitted By
Annalis Brownlee
Submitted On
11/15/2021 4:42:21 PM
Affiliation



PC012
1 of 1

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Support for Proposal 27

As a multi-year participant in the Copper River subsistence fishery, I appreciate the addition of Saturday subsistence openers that was adopted at the 2017 board meeting. Prior to that, subsistence users were relegated to competing with commercial fishermen during regularly scheduled commercial openers. Given the vast disparity in fishing power between a commercial fishermen and subsistence users, subsistence fishermen were at a marked disadvantage. It was often challenging for subsistence users to catch enough fish for the year in one or two periods of fishing. Being able to fish on Saturdays has also opened up access to subsistence users that are unable to fish during commercial openers that typically take place during the Monday-Friday work week... as long as everything else lined up: the weather was okay, the tides were right, and there wasn't a 48 hour commercial period that just took place from Thursday morning until Saturday morning that had cleaned out almost all the fish in the district.

Proof that there was need for additional subsistence opportunity in the Copper River District is evident from the increase in both subsistence harvest and fished permits in 2018 and 2019 (avg. 7,021 salmon and 392 permits; data from RC 2 Table 27-1) after the addition of Saturday subsistence openers compared to the previous 9 year averages from 2009-2017 (avg. 2,793 salmon and 161 permits). A similar increase in subsistence harvest and participation was also seen in the Prince William Sound general area subsistence fishery (2018-2019 avg. 293 salmon and 12 fished permits vs. 2009-2017 avg. 37 salmon and 4 fished permits; data from RC 2 Table 27-2).

Despite increased subsistence harvest in the Copper River and PWS subsistence fisheries with the addition of Saturday harvest days, the overall harvest is still fairly low (fewer than 10,000 salmon per year) and, more importantly, remains lower than commercial homepack (data in RC 2 Table 27-4).

Further evidence of the need for increased subsistence access is the fact that not once in the past 11 years have either of the villages of Tatitlek or Chenaga been able to harvest enough salmon to meet the lower bound of the amounts reasonably necessary for subsistence (ANS; data from RC 2 Table 27-3)!

In summary, Proposal 27 would increase access to subsistence users, who should - under state law - have the highest priority when a harvestable surplus is available. There are few legitimate conservation concerns given the relatively small amount of subsistence harvest compared to commercial homepack, let alone commercial harvest. The board should adopt this common sense proposal.

Sincerely,

Annie

Submitted By
Anthony Zielinski
Submitted On
11/7/2021 3:45:47 AM
Affiliation

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Eagle River, Alaska 99577



PC013
1 of 1

Strongly oppose proposals 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, and 20. Support proposals 18, 21, and 22.



Via email
November 5, 2021

Alaska Board of Fisheries
Attn: Executive Director
glenn.haight@alaska.gov

RE: Request to Schedule Consideration of ACR 7 Issue Outside of March 2022 Meetings

Dear Executive Director Haight,

On October 20, 2021 the Board accepted ACR 7 for consideration at an upcoming Board meeting. Since that time, we've heard that the issues raised by ACR 7 will be considered at a Board of Fisheries meeting in March 2022. Area M Seiners Association respectfully requests that the matter not be considered at either the March 10, 2022 or March 11-16, 2022 Board meetings because those dates conflict with the State-water Pacific cod fishery, which a large proportion of Area M fishermen participate in (5 AAC 28.081). Even if the March 11-16 meeting is extended for two days to March 18,¹ Area M fishermen will not be able to participate.

The fundamental goal of ACR 7 is to further restrict Area M salmon fisheries. It is crucial that Area M fishermen participate in the Board process initiated by acceptance of ACR 7 to protect their rights and their livelihoods, and to provide the Board with data and perspectives that are sorely lacking from the consideration of the Chignik issue thus far.

It would be contrary to State law and policy to require Area M fisherman to forgo a commercial cod season just to participate in the Board process where the Area M salmon season is being considered. Due process requires that the Board ensure that Area M fisherman have the opportunity to be heard and to adequately represent their interests during the Board's consideration of the Area M fisheries issues raised by ACR 7. Thus, the Board should not schedule consideration of Area M issues at a time when Area M fishery participants will not be able to attend.

We thank you for your consideration of this request and await your prompt response.

Sincerely,
Area M Seiners Association

BY: _____ Kiley Thompson _____

¹ See https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2021-2022/2021_2022_legal_notice.pdf at pg. 4.

Submitted By
Ariana
Submitted On
11/6/2021 11:16:03 PM
Affiliation
subsistence fisher



PC015
1 of 1

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wasilla, Alaska 99687

I have been fishing in Alaska my whole life. Dip netting on the copper river means everything to my family and close family friends. Every year I proxy for friends or family that can no longer fish for their own family due to age and or inability to catch their own fish because dipnetting can be labor intensive. With the increase of cost of living, going to the copper river to supply a years worth of fish in one weekend, saves my family on spending more time, money and gas that we don't have to provide food for our families. The copper river is a dangerous river, so the past 5 years I have trusted the experience of a guide to take us to a safe area in the river to dip net. This will impact our families exponentially if we are unable to utilize a guide service to dip net, not to mention our safety. There will be an increase in boating accidents on the copper if we ban guide boats. So an increase in boat fatalities or accidents means utilizing more resources from search and rescue teams when this can be avoided because there are professional guides that have been navigating this river for years. They give Alaskans a safe way to dip net on the copper river. There are not enough resources close to Chitna or anywhere near the copper river to establish timely rescues with this river. This river is unforgiving, boaters that utilize this river without any experience should be required to have a supervised course to prove they are able to navigate this river safely. I have seen way too many close call boaters that do not have a clue how to navigate this river. I strongly oppose the banning guide services boats on the copper river.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial salmon fisheries of the Prince William Sound region. I grew up in Kodiak, Alaska and have been salmon seining since 1967. Salmon seining in PWS is about half of my family's income each year.

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.

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.

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,

Armin Reimnitz
apreimnitz@msn.com
(425) 418-7500



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 lifelong resident of Seward, have commercial fished for 30+ years, and am a longtime ADFG advisory committee member. The Prince William Sound pink salmon fishery has been a mainstay of my commercial fishing income since 1980. Hatcheries have helped mitigate the disastrous effects of the Sound's occasional natural run failures.

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.

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

Sincerely,

Arne Hatch
aahatch@ak.net

Submitted By
Ben Behan
Submitted On
11/2/2021 1:40:40 PM
Affiliation



PC018
1 of 2

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2021 PWS Board of Fish Written Comments

Chair and Board Members,

Thank you for providing this opportunity to comment before the upcoming Board of Fish Meetings in Cordova. My name is Ben Behan and I reside in Madison, WI. I am a current setnet permit holder in the Eshamy District.

Proposal 27- OPPOSE Opening up subsistence fishing seven days a week in the Eshamy District could have severe negative consequences. This proposal could have detrimental effects on the progress of cost recovery and brood stock, wild escapement goals, and all user groups. There is already sufficient time and area for subsistence harvest in this district. Please oppose this proposal.

Proposal 42- OPPOSE Proposal 42 is extremely allocative and poses great risk to the setnet gear group. Our current trigger is already a very narrow window to remain in compliance. Changing our trigger from 1% to 0.25% would cause us to be out of compliance more often, which is not the intention of the allocation plan.

If Proposal 42 was passed, the setnet gear group would be consistently cut back to 36 hours a week and could be well below our allocated percentage. The seine and drift gear groups have bonus opportunities rewarded if they are significantly under allocation, while the setnet gear group is simply warranted status quo in response to catastrophic harvest years. We are only punished for having 'successful' seasons that are highly influenced by the actual harvests of the other two user groups. Compared to the total of common property harvest value, the setnet harvest is nearly insignificant in determining the setnet allocation percentage.

Please oppose this proposal as it is completely unnecessary and our current trigger and emergency action are working to keep us in compliance with the allocation plan.

Proposal 43- SUPPORT I agree with the author of this proposal and suggest that VFDA fish be included as enhanced salmon in the regional plan. All users should benefit from the value of these enhanced fish by incorporating them into the equation.

Proposal 44- OPPOSE The author of this proposal states that their recommendation will maintain parity between user groups. This suggested regulation change would do the exact opposite and only create more disparity between user groups by providing exclusive rights in the Eshamy District to the drift gillnet gear group for an entire opener each week.

In addition, it would drastically reduce the involvement of the setnet gear group after July 10th. It would not be feasible to fish one 36 hour period a week and have to wait five and a half days on the beach until we were allowed to fish again. With no alternative districts to fish in, a majority of the setnet fleet would no longer fish after July 10th on years that we were limited to fishing the first 36 hours per week as the author proposes.

This allocative proposal has the intention of severely damaging the setnet gear groups' livelihoods, while seeking to provide exclusive benefits to the drift gillnet gear group.

With such low harvest level values relative to the other two user groups, the setnet allocation percentage is significantly effected by the price and harvests of the other user groups. For example, a slight change in pink salmon price could drastically change the setnet gear groups' allocation percentage. Generally, whether we are in or out of compliance it is most directly related to harvest value of the other two user groups rather than the actual harvest value of the setnet gear group.

The allocation plan is meant to work over time. The current corrective action of limiting us to 36 hours per week after July 10th promptly brings us back into compliance within a year or two of being limited to 36 hours per week. There is no need to change the corrective action criteria for the set gillnet user group. I encourage all members of the board to oppose this allocative proposal that has potential to create even more disparity between user groups.

Proposal 45- SUPPORT I support this proposal that intends to reduce conflict and confusion within the Main Bay Subdistrict THA. The current regulations have unintentionally caused absolute chaos in the Main Bay Terminal Harvest Area, creating a hostile environment that poses many challenges for law enforcement in this management area. I encourage you all to support this proposal that will help to restore order in the Main Bay Subdistrict THA, create consistency within the Eshamy District, and provide clarity for law enforcement and all user groups involved.

Proposals 46- OPPOSE This proposal is unnecessary and the current regulations already allow the use of deep gear in order. Eliminating the restrictions on deep gear could result in over harvest of hatchery and wild stocks before escapement is achieved.



PC018
2 of 2

Proposals 47-48- OPPOSE These proposals are unnecessary, as management already has the ability to limit time and area in districts to prevent the harvest of stocks bound for other districts.

Proposals 49-55- OPPOSE All of these proposals are attempting to reduce hatchery production without the proper research solidified to warrant such measures. The goal of the hatcheries in the Sound is to provide adequate fish for all user groups and consumers while reducing the harvest levels of wild stocks. Please oppose these proposals that could have severe economic and biological effects.

Proposal 58- OPPOSE I oppose this proposal, as there is significant risk to wild and hatchery stocks by allowing daily fishing periods. AFK is a major corridor for fish bound for other districts, and it would be irresponsible to grant daily fishing periods in this district when other districts are yet to achieve their escapement goals.

Thank you members of the board.

Ben Behan



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 salmon fisheries of the Prince William Sound Region through processing. Managing a commercial salmon fishing fleet of seiners and drift gillnetters in PWS. being born and raised in Kodiak, I have a deep rooted relationship to any community where salmon and all things surrounding them are a way of life. I have been involved with commercial salmon fishing since being born into it in Kodiak. Now that I live and work in PWS directly involved with processing salmon, it continues to be a way of life for myself and so many others in the 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,

Ben Kirchenschlager
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Submitted By
Ben Van Alen
Submitted On
11/14/2021 7:51:41 PM
Affiliation
independent researcher



PC020
1 of 1

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My questioning comments are made in support of Proposals 49 to 55. Hatcheries must comply with existing laws and regulations and release numbers must be moderated if we are to sustain healthy and productive wild stocks. I also recommend reducing hatchery release locations and the releasing of fish larger than their wild counterparts.

How can hatchery fish help wild fish?

Is there an ecological niche for hatchery fish? Don't hatchery fish swim with wild fish? Don't hatchery fish compete directly with wild fish for the space and food needed to grow and survive to reproduce? Don't hatchery fish stray and spawn with wild fish? Don't wild fish turn into wild/hatchery hybrids the first years of hatchery strays? Is biodiversity enhanced by having thousands of wild populations in all the run or a handful of release groups in most of the run? How can the fitness of these hybrids be better than that of locally adapted interbreeding wild fish? Don't wild salmon help nurture their offspring with their marine/carcass-derived nutrients? Perhaps wild salmon spawning and dying by the millions in thousands of natal streams is key to sustaining the productivity of our watersheds and estuaries? Isn't the abundance of salmon (and all biota) limited more by the environment's carrying capacity than by the numbers of young? Can you think of an animal, or plant, or microbe on Earth whose productivity and abundance is limited more by reproductive capacity than carrying capacity? Would you agree that carrying capacity trumps reproductive capacity for all biota? How can there be a big open niche in the environment for hatchery fish that is not already filled by other fish? Why would we think that the ocean is limitless and that all we need to do is release little ones to harvest more big ones? Doesn't the releasing and harvesting of hatchery salmon result in nutrient mining and ecological overshoot? Perhaps we are just letting millions of hatchery fish join in the ecosystem potluck without bringing a dish? Shouldn't we assume that if we want to harvest more fish then we need to maintain the spawners (fertilizers)? How can doing something so different from nature in nature be better than nature? Where have we done so without unintended consequences? Where on Earth has the free-range ranching of livestock that mine more nutrients than they recycle proven sustainable, ecologically sound, and profitable? Where do we have production hatchery releases and not declining or depressed 'wild' runs of eulachon, herring, or salmon? Why would we assume that hatcheries are supplementing rather than supplanting wild salmon? Just because thousands return to where they were released? Why disregard the State's wild stock priority and precautionary principle? Why should hatcheries be allowed and encouraged to release super-sized fish so they will have a survival advantage over wild fish? Why spend money to make fish when nature will make more for free? Shouldn't management focus on maintaining quality spawning, rearing, and migration habitats and quality distribution and abundance of wild spawners. How could there be a sustainable economic niche for hatchery fish if there is not an ecologic one? What do we want - hatchery jobs and hatchery harvesters or healthy stocks and healthy fisheries? How will it be possible to rebuild and sustain wild stock escapements and returns with ongoing production hatchery introductions?

Submitted By
Ben Wernette
Submitted On
11/11/2021 8:42:47 AM
Affiliation



PC021
1 of 1

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Keep dip netting the same. Allow personal boats. I am good with getting rid of commercial fisheries and commercial operations (including charters). Let citizens use their own boat.

Proposal 6 -Oppose!

Proposal 8 - Oppose!

Proposal 9 - Oppose!

Proposal 10 - Strongly Oppose!

Proposal 11 - Strongly Oppose!

Proposal 12- Oppose!

Proposal 13 - Strongly Oppose!

Proposal 14 - Strongly Oppose!

Proposal 15 - Strongly Oppose!

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
Blake Yorde
Submitted On
11/14/2021 1:00:46 PM
Affiliation
Fishing guide



PC022
1 of 2

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Board of Fish Meeting Letter

Hello,

My name is Blake Yorde. I've been a fishing guide in Copper Center, Alaska and surrounding area since 2007. The entire Copper basin relies on the salmon runs of the upper Copper River drainages. Most importantly to us as sportfishermen, the King salmon runs. I know there's not been a lot of representation for sportfishermen from the Valley in years past, mostly I believe because there's truly not many of us. However, the economic impact we have with our clientele coming to the state of AK and supporting the Copper Basin are immeasurable. I know Brandon Thompson will be speaking on our behalfs next month, and I fully support him.

Proposal 5: Strongly Oppose

As you may know, Copper Center is situated at the confluence of the Klutina and Copper Rivers. Salmon is an important subsistence and sport fishing resource for many community members and provides a critical economy for many businesses in the Copper Basin related to fishing and tourism – restaurants, gas stations, bed & breakfasts, grocery stores, etc. The proposal presented by the Kenai River Sportfishing Association (KRSA) to raise the limit goal could have a serious impact to our community members and their livelihoods. Further, we don't see how the KRSA could have a better understanding of managing fish in the Copper River tributaries than State of Alaska Department of Fish & Game biologists, who in 2020 recommended an escapement of 21,000 – 31,000 fish. Proposal #5 would raise the escapement goal for king salmon from the current escapement goal of over 21,000 - 31,000 king salmon to 24,000 – 40,000 king salmon: essentially making it very difficult to sportfish any of the Upper Copper tributaries (i.e., Gulkana, Klutina, & Tonsina Rivers). Fish and Game has a very conservative management regime in place in the Copper Basin and does not hesitate to introduce precautionary measures like limiting harvest, restricting bait, or mandating catch & release only – or even closing fishing for king salmon entirely – if returns are not where they should be. As the owner of a business centered on sportfishing, and more generally as a person invested in the sustainability of this species for generations to come, I have always been impressed by ADF&G's management of this resource and feel that we should trust their data and knowledge moving forward.

Proposal 8: Agree

Proposal 8 states that there will be no dipnetting in the confluence 500 yd below and 100 yd upstream of any tributary in the upper Copper River. ADFG marks the tributaries in a straight line from top to bottom of the confluence. This method allows for sections of the river to grow past that line, which causes some confusion on where you can and cannot dipnet. Changing these boundaries will alleviate any confusion and allow the tributary mouth to change year to year. I see firsthand that these waters are prime conditions for fish to gather and prep for their push up to the spawning grounds. Dipnetting these areas seems to be akin to "shooting fish in a barrel." For example: The smaller tributaries are closed to all fishing for salmon within a quarter mile. Why would it be different along the copper in the larger tributaries?

Proposal 41: Strongly Oppose

This proposal to lift the inside boundaries for Kings is far reached and dangerous. With the difficulties of managing King Salmon and total numbers not meeting expectations, to open the natural king territory would do significant damage to the fish population. Commercial fishing inherently has the potential to do more harm to the fishery than any other user group just due to the method of harvest and the number of fish that they take. We see king returns trending downwards recently and I cannot understand the reasoning behind a proposal like this.

Proposal 32: Agree

If the rainbow populations on the Gulkana are sustainable, we should be allowed to keep trout. Fishing these waters on the regular, the Gulkana does not have the fishing pressure it got in the past.

Thank you for your time, and more importantly, your support for sportfishing.

Blake Yorde

218-310-3353

blakeyorde@hotmail.com

Copper River Guides

Formerly River Wrangellers and NOVA



PC022
2 of 2

Submitted By
Brandon D. Maxwell
Submitted On
11/15/2021 5:23:10 PM
Affiliation



PC023
1 of 1

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Nov 15th 2021

Re: Prop 42-58

Hello, my name is Brandon D. Maxwell. I have commercially fished the P.W.S. salmon season the last 11 years. I currently own an operate a set net lease in the Eshamy district. I am writing the Board today in regards to proposals 42 thru 58.

I strongly urge the Board to Oppose Prop 42. Prop 42 would seem to continually put the set net fleet out of compliance at a 0.25% trigger, the current 1% keeps us closer to our allocation plan with the Eshamy District are only available resource. I ask that the Board Reject Prop 42. In regards to Prop 43 I ask the Board to Support this proposal. I'm asking the Board to Oppose Prop 44. I strongly urging the Board to Oppose 44 as there's no need to change current allocation correction action plan. Limiting the set net fleet the one 36 hr period could have serious impact financially, maintaining crew members an harvesting quality fish. Eshamy district is are only available fishery in the P.W.S. Two short period have worked well in the past as the drift fleet had multiple options. Please Oppose Prop 44. I'm asking the Board to Support Prop 45. I strongly urge to Board to Oppose Proposals 46,47,48,49,50,51,52,53,54,55. In regards to Prop 58, I strongly urge the Board to Oppose. Prop 58 I believe will have great impacts in regards to seiners intercepting an catching wild an hatchery fish heading elsewhere, I ask the Board to Oppose Prop 58. I ask the board to Oppose Prop 59. I'm in Support of Prop 60 as long as it doesn't move any leases sites. I currently lease 3 an would not like there lines moved. Thank you

Brandon D. Maxwell

Submitted By
Brandon Thompson
Submitted On
11/13/2021 12:28:38 PM
Affiliation
Copper River Guides



PC024
1 of 1

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po box 275
copper center, Alaska 99573

Greetings,

My name is Brandon Thompson. I am a business owner and sport fishing guide in Copper Center, Alaska. This town, these businesses, including myself rely on the salmon runs of the upper Copper River drainages. I realize that there is generally not a lot of representation for the sport fisheries up here, and I thought I would comment on a few proposals that could affect our fisheries. I agree that we need to manage the salmon runs closely and all user groups need to participate and appreciate the opportunity to present my thoughts, which are based on 15 years of fishing and guiding on Copper River tributaries, to the Board.

Proposal 5: Strongly Oppose

As you may know, Copper Center is situated at the confluence of the Klutina and Copper Rivers. Salmon is an important subsistence and sport fishing resource for many community members and provides a critical economy for many businesses in the Copper Basin related to fishing and tourism – restaurants, gas stations, bed & breakfasts, grocery stores, etc. The proposal presented by the Kenai River Sportfishing Association (KRSA) to raise the limit goal could have a serious impact to our community members and their livelihoods. Further, we don't see how the KRSA could have a better understanding of managing fish in the Copper River tributaries than State of Alaska Department of Fish & Game biologists, who in 2020 recommended an escapement of 21,000 – 31,000 fish. Proposal #5 would raise the escapement goal for king salmon from the current escapement goal of over 21,000 - 31,000 king salmon to 24,000 – 40,000 king salmon: essentially making it very difficult to sportfish any of the Upper Copper tributaries (i.e., Gulkana, Klutina, & Tonsina Rivers). Fish and Game has a very conservative management regime in place in the Copper Basin and does not hesitate to introduce precautionary measures like limiting harvest, restricting bait, or mandating catch & release only – or even closing fishing for king salmon entirely – if returns are not where they should be. As the owner of a business centered on sportfishing, and more generally as a person invested in the sustainability of this species for generations to come, I have always been impressed by ADF&G's management of this resource and feel that we should trust their data and knowledge moving forward.

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Proposal 8 states that there will be no dipnetting in the confluence 500 yd below and 100 yd upstream of any tributary in the upper Copper River. ADFG marks the tributaries in a straight line from top to bottom of the confluence. This method allows for sections of the river to grow past that line, which causes some confusion on where you can and cannot dipnet. Changing these boundaries will alleviate any confusion and allow the tributary mouth to change year to year. I see firsthand that these waters are prime conditions for fish to gather and prep for their push up to the spawning grounds. Dipnetting these areas seems to be akin to "shooting fish in a barrel." For example: The smaller tributaries are closed to all fishing for salmon within a quarter mile. Why would it be different along the copper in the larger tributaries?

Proposal 41: Strongly Oppose

This proposal to lift the inside boundaries for Kings is far reached and dangerous. With the difficulties of managing King Salmon and total numbers not meeting expectations, to open the natural king territory would do significant damage to the fish population. Commercial fishing inherently has the potential to do more harm to the fishery than any other user group just due to the method of harvest and the number of fish that they take. We see king returns trending downwards recently and I cannot understand the reasoning behind a proposal like this.

Proposal 32: Agree

If the rainbow populations on the Gulkana are sustainable, we should be allowed to keep trout. Fishing these waters on the regular, the Gulkana does not have the fishing pressure it got in the past.

Thank you for your consideration,

Brandon Thompson/Copper River Guides

Submitted By
Brian Charlton
Submitted On
11/9/2021 2:31:25 PM
Affiliation



PC025
1 of 1

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I have been fishing in Chitina for 28 years and have done it all. Shore fishing, fish wheel, sweeping, charter drop-off, and boat fishing.

I support most of the requests of the Chitina Dipnetters Association as follows and will provide specific rebuttals to several proposals:

Prop 5 support

Prop 6 oppose

Prop 7 - support I'd like to see guides stay out of the subsistence area (note this is different from CDA)

Prop 8 - oppose - name specific tributaries. This would eliminate the Kuskulana and therefore the primarily land and boat accessible fishery in the subsistence area.

Prop 9,10, 11 -oppose- I have come to rely on dipnetting from a boat and would be put at a disadvantage if it were removed. There are no good spots (well VERY few) to fish from shore in the subsistence area.

Prop 12 and 13 - oppose - Who got there first? Fishwheels should not be able to hog all the good areas.

Prop 14/15 -oppose- Kings flop right out of the net with no issues, it's red's that get stuck. But who is throwing reds back.

Prop 16 - oppose - I think the guides use fish finders.

Prop 17 - support - I'm all for bag limits. The limit of 500 is ridiculous. - Should really be limits on king take for fish wheels.

Prop 18 - support

Prop 19, 20, - oppose

Prop 21 support

Prop 22 support

Prop 41 - oppose



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial fisherman and live in Halibut Cove. My partner and I own a seiner and fish Prince William Sound.

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.

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,

Brooke Poirot
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(907) 230-8698



Comments by Bruce Cain November 15, 2021

My name is Bruce Cain. I have lived in Alaska since 1970. My wife and I raised our 7 children (Shirley says she raised 8) while living in Fairbanks, Anchorage, Glennallen, and Cordova. 16 of my 17 grandchildren are being raised in Fairbanks and Cordova. One is being raised in Wyoming. All my family participates in at least one of the Copper River fisheries (Commercial, subsistence, personal use, or sport) in one way or another.

Since 1975 I have participated in the salmon fisheries of the Copper River and its tributaries. I have sport fished for Kings and Sockeye, I have dipnetted under the personal use regulations, I have operated fish wheels under state subsistence regulations, I have commercial fished on the flats as a deck hand, I have subsistence fished under state regulations on the flats, in the 90's, I operated a cost recovery fishery with a weir and seine on the outlet of the Crosswind Lake System to remove excess hatchery produced sockeye (which were such a problem that people were complaining there were too many salmon returning, today there isn't even enough to make brood stock), I was part of the team that initiated the mark recapture program to provide an estimate of the Chinook component of the mile lake sonar count that today is used in the copper river management plan. As part of this program, I oversaw the operation of 2 research fish wheels at Baird Canyon and 2 research fish wheels just below Haley Creek from 2000 to 2010. The program has continued through today. From 2000 to 2010 I was the first person on the Copper River with a boat for the season and the last one off in a boat for the season pushing ice flows with prop outboards (jets would clog). I have worked with Ahtna customary and traditional fishing families since 1987 and have learned some of this vast knowledge and applied it in my work and harvesting fish for my family and community. I have personally observed the catch per unit effort of research wheels for over 10 years. I have personally observed subsistence catches in fish wheels from Ahtna families and my own personal wheel since 1987.

I am writing today to comment on several proposals because I am concerned about the Copper River and its salmon runs. We have a good system in place, but there have been tremendous changes in the participation rate, efficiency, mobility, and harvest level of the in-river fishery. We have also seen dramatic drops in the few actual spawning bed escapement indicators on the system such as the Gulkana hatchery brood stock. I have also personally observed dramatic reductions in catch rates from subsistence wheels that I am familiar with in the Glennallen subdistrict except during times that other fisheries are severely restricted.

We must adjust our management system in response to these changes or we will lose the resource. We don't have to look very far. There are far too many examples of a system that has lost its historic runs and now experience very low returns with severely restricted or no harvest allowed. Until recently, the Copper River has been one of the last strong salmon runs in the world. In recent years, we have had two run failures, and, unless we make



changes, more are to come. The good news is we can make changes. The proposals before you this cycle can be used to address the issues and keep the runs strong. We still have a chance. These aren't easy decisions. I encourage the board to operate with the fullest participation. We aren't going to all agree. The board process provides a forum to debate these issues openly and together we will make good decisions. Please encourage input from everyone, please discern and weed out the information that can be used and above all, act.

Issue summary 1. The abundance-based management model needs better data. Support Proposal 6 for responsible management.

- a. The abundance-based management model used on the Copper River is a wonderful tool, if there is abundance.
- b. The model is simple and, in my mind, can be summarized with the following formulas (My apologies to the professional managers for oversimplifying)

The simple Formula 1: Commercial harvest (reported within 24 hours of closure) + Delta subsistence Harvest (reported informally per opener to in season manager) + Miles Lake Sonar count = Total Return.

The simple Formula 2: Spawning Bed Escapement (Modeled and assumed) = Miles Lake Sonar count – In river harvest.

The (not so simple) Formula 3: Sockeye Spawning Bed Escapement goal (includes wild escapement and Gulkana Brood Stock) = Miles Lake Sonar Count - Chinook component (Formula derived mark recapture Peterson estimate) - Personal Use Harvest in the Chitina Subdistrict (dipnet from shore and dipnet from boats reported after the season)-Federal Subsistence harvest in the Chitina Subdistrict (dipnet from shore and dipnet from boats reported after the season)-State subsistence dipnet harvest in the Glennallen Subdistrict (from shore and from boats reported after the season)-State subsistence fishwheel harvest in the Glennallen subdistrict (reported after the season)-federal subsistence harvest in the Glennallen subdistrict (fishwheel, dipnet from shore and dipnet from boats. Reported after the season)-sport harvest (estimated well after the season statistical survey)-Batzulnetas subsistence harvest (Fishwheel and dipnet from shore reported after the season) – other mortality (estimated informally).

- c. The Bottom Line. Without accurate, timely in-river harvest data, the model doesn't produce accurate results. Two of the three elements in the abundance-based model (Formula 2) need to be accurately known. For the model to work, we need to have good in river harvest data in season. In river harvest reported at the end of the season is no longer adequate with the expanded participation, efficiency, and mobility of the in-river fishery. Daily in-river harvest data can be efficiently provided and is responsible management.



- d. Discussion. In river harvest is simple enough to manage when the in-river fishery is small predictable, and errors can't be big. That worked 30 years ago when the in-river fishery was made up of known fish wheels and established dipnet sites from shore with known access points in a relatively small area.

Today, the participation in the in-river fishery has expanded and the gear types have changed. The definition of subsistence has also changed. Prior to the McDowell decision, subsistence in Alaska was a term to attempt to provide for indigenous harvest that was protected by article 12 section 12 of the Alaska constitution. In practice this was regulated by issuing state subsistence permits to residents of the Copper Basin. It wasn't perfect, but it worked. McDowell changed this and in practice has been implemented to allow any Alaska resident to obtain a state subsistence permit. This has greatly expanded participation and harvest limits with no means to regulate other than closing all state fisheries first.

Because of this, more accurate and timely in-river harvest data is needed. The fishing power and mobility of these expanded efforts can quickly overharvest holding salmon during high water. As a result, the assumed spawning escapement in the abundance-based model isn't achieved. We have seen evidence of this in 2019 and 2021 from poor total returns and very low Gulkana hatchery brood stock returns for 10 years.

This issue can be addressed by supporting proposal 6. Daily in season reporting is done for the commercial fishery and informally with the state subsistence fishery on the flats. Daily in season harvest reporting is needed to manage the in-river fishery with growing participation, efficiency, and mobility. The abundance-based model is based on assumptions, but data is needed. It is our responsibility to provide that data. Without in season reporting of in river fisheries, the returning salmon counted past the Miles Lake sonar can be overharvested without knowing it until it is too late.

Several proposals to limit gear and area are submitted this cycle. The need for restrictions would be less with daily harvest reporting of all participants.

It is easy to report daily, and a lot of people already do it. Just look on Facebook. People snap a picture of all the fish they caught and post it online. It would be very simple to set up a way to report online daily. In fact, the department has already put online reporting in place, it just needs the one extra step to require that it be done daily. The in-season manager can look at the data, add it up, and use it to manage the fishery. Problem solved.



2. Issue summary 2. Dipnetting from boats is harvesting most of the salmon holding during high water and impairs the resource. Support Proposals 9, 10, 11, 12 and 13.

- Ahtna customary and traditional knowledge that I have learned is that during high water fish go to the bottom to rest.
- Mark Recapture data and radio telemetry data shows that salmon run timing in the copper river during high water can be delayed up to 45 days. This creates large holding areas of vulnerable salmon of up to 80% of the run.
- Recent Radio Telemetry studies have shown over 90% mortality of tagged sockeye between the tagging point at Canyon Creek and the upper bound of the Chitina Subdistrict.
- Traditional in-river harvest methods of fish wheels and dipnetting from shore require salmon to migrate past the fishing area to be caught. This protects holding salmon until they are ready to travel.
- In my experience, when the water on the Copper River drops, a wall of salmon goes by for three days. This is the result of all the holding salmon finally getting through from the water velocity dropping. This normally occurs 1 to 3 times per season.
- This is a survival technique for many populations such as salmon to all go through at once. Only so many can be caught/eaten etc. in a day. If they all go through at once, most get through.
- In recent years, when the water drops, there is no longer a wall of salmon.
- Recent technology of dipnetting from boats allows holding salmon to be harvested while they are vulnerable and held back by high water. In my opinion, we no longer get the typical wall of fish when the water drops because holding salmon have been harvested or exhausted from being disturbed in holding areas.
- Dragging dipnets through holding areas disturbs and exhausts the salmon that are not caught, causing unknown damage to the resource from premature mortality and failure of escaping salmon to make it to the spawning beds.
- In 2019 and 2021, we experienced a very low return and more low returns should be expected if we continue this practice.

Issue summary 3. Gillnet web on dipnets is damaging to the resource. Support proposals 14 and 15.

- Dipnets especially when dipnetting from boats, get caught on rocks or snags and are lost.
- These lost "ghost" nets keep fishing forever.
- I have picked up some of these nets in low water, but more are out deeper. See photo at Haley Creek this fall there are 2 nets in this picture.
- There are nets like this all up and down the Copper River now. Note 2 nets in this picture. One is caught on the rocks upstream of the blue handled net. During high water salmon hold in these rocks.



Submitted By
Bruce L. Freet
Submitted On
10/18/2021 3:48:55 PM
Affiliation
Fidalgo Fly Fishers



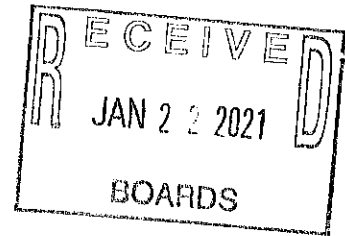
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Proposal #39, Ibeck Creek: It should be made clearer that the closure is proposed to begin 1/4 mile upstream of the Copper River Highway, **not** from the bridge to 1/4 mile and open upstream from the 1/4 marker. I have a similar impression that Coho are receiving too much fishing pressure, but does the redd count or smolt outmigration data support this opinion? If not, I recommend other management options other than closure such as catch and release or reduce the amount to harvest. To begin with a complete closure, unless supported by data, is too restrictive and will not be well received by the fishing public.

Proposal #40, 18-Mile or Silver Creek: This stream is our favorite fishing location for catch and release, barbless hook fly fishing. We come to Cordova and stay for 6 days specifically to fish for Coho salmon here and on Ibeck Creek. This year for the first time, our party of four fly fishers were totally grossed-out by a party of five bait anglers that harvested every fish that they could from 18-Mile for three days. Their harvesting methods caused conflict. This small tributary can not sustain this kind of fishing pressure! However, I am against complete closure unless redd survey or smolt outmigration data supports it. The USFS built a very nice wood plank trail to some fishing locations, which we thoroughly enjoy, and now you are going to close it to fishing. It doesn't make sense when there are other management options. Why not have special regulations such as reduced harvest (fish limit per day per angler); have catch and release only with one barbless hook; etc. Whatever you do, it should include the entire 18-Creek to its confluence with the Alaganek Slough.

I am a retired NPS ecologist and manager as well as a 11 year Board member of the Skagit Fisheries Enhancement Group, so I know something about what I have suggested. Thank you for your thorough consideration of the facts and management options presented to you.

Alaska State Board of Fish Members
Other Interested Parties
Alaska Department of Fish and Game
PO Box 115526
Juneau, Alaska 99811



Date: January 11, 2021

Regarding: Proposals 38, 39 and 40 in the PWS/Cordova area of the Copper River Delta for Sport and Commercial fishing

Dear Board Members:

I am writing this letter to make comments on recent proposals to the PWS area and in particular, the Cordova and Copper River Delta area. The proposals that I find most troubling are numbers #38, #39 and #40.

First, proposal #38. This proposal states that restrictions should be placed on sport fishing determined if the commercial fishing fleet has openers or not. To me, this proposal is trying to establish the commercial fishing sector as the "manager-in-fact" for not only commercial fishing but for the sport fishing area as well. That seems totally contrary to the direction that the ADFG has taken in establishing a Commercial Fishing manager and a Sport Fishing manager throughout the State and it seems the entire management of the Alaska Department of Fish has the same organizational structure. This regulation seems almost as a retaliatory effort by commercial fishermen for the 2019 Coho season when the commercial fishing had no openers, yet sport fishing was allowed to continue but with a retention limit of only 1 Coho per day. I also believe that many people including commercial fishermen seem to think that there is a high mortality of caught and released fish and thus, they might believe that the sport fishermen were having a very detrimental impact on the numbers of Coho surviving to get to the spawning beds.

I admit that I thought released fish had a high mortality but I embarked on a lengthy study into the mortality of released fish to prepare this response. I reviewed many previous studies, some dating back multiple years. One study was an exhaustive study that examined and summarized many of the studies I read. It appears to me that approximately 4% of fish released from artificial lures (whether single hook or treble hook) perish. (This is from an article published in 2005 by Aaron Bartholomew and James A Bohnsack entitled "A Review of catch and release angling mortality with implications for no-take reserves.") What did matter was that fish caught in the gills or esophagus/intestine was much more likely to perish. This more commonly happens with bait caught fish. Another study conducted way back in 1964-65 by Leo Marnell at Yellowstone lake and again found that fish released from artificial lures had a low mortality and bait caught fish had higher mortality rates. I also talked to Jason Dye, a current ADFG sport fish biologist who has been studying mortality on released Chinook salmon in the Nushagak river. His study is not published yet, but he gave me permission to state that overall mortality in these salmon based on all hooking locations showed a mortality less than 7%. Finally, Lisa Stuby, another current ADFG employee conducted a study in 2001 and published in 2002, studying the mortality of released Coho Salmon in the Unalakleet river in relation to distance from Norton Sound. I was also able to talk personally with Lisa Stuby on January 11, 2021. Even though she was studying the effects of Coho salmon being released at different distances up the Unalakleet river, she also noted that when Coho were caught in the mouth area without bleeding, their survival rate was very high (I believe

it was over 95% survival) but when the fish was caught deeper or was bleeding, their survival rate was much lower. It is generally believed that fish take bait deeper and thus it seems more likely to sustain fatal injuries when being released, but artificial lure and fly taken fish typically are hooked much more often in the mouth area and have a very very good chance of survival when being released. In addition, Lisa Stuby also found through radio tracking that released fish were very likely to continue their journey to spawn in the appropriate spawning areas after being caught and released.

In relation to all these studies, it seems to me that there is no reasonable basis to restrict catch and release sport fishing (especially when using lures and flies) in the Copper River Delta when commercial fishing is restricted. Commercial fishing kills every fish they catch (that is the intent) whereas sport fishing, especially when using artificial lures or flies, has a low impact on the number of spawning fish. Jay Baumer did limit the retention of Coho Salmon to 1 fish from 3 and allowed catch and release to continue. I believe that was an appropriate action and had a small impact on the number of Coho salmon getting to the spawning beds. HOWEVER, I am a strong believer that any catch and release of bait caught fish should not be allowed. That does seem to have a high mortality on all fish and I think any release of bait caught fish should be prohibited.

With respect to the above noted studies and the actions of the sport fishing area manager, I believe that sport fishing should be managed by sport fishing managers through the ADFG as it is now. This responsibility should not be delegated to commercial fishermen and thus, I am very much opposed to Proposal #38.

Proposals #39 and #40-- These two proposals aim to stop any Coho sport fishing on the Ibeck River above the Copper River Highway and any sportfishing on any areas of 18 mile or Silver Creek. These two proposals would, without a doubt, stop any sportfishing in the Cordova area. I have talked to dozens of our guests who have stated the same thing. The reason these proposals would end sport fishing in Cordova is because of limited access to other areas especially when weather conditions leave no other place to fish.

Anyone familiar with the Cordova and Copper River Delta system know that Cordova gets a lot of precipitation per year, generally around 159 inches per year and rain falls on average 206 days per year. (www.weather-us.com). According to weather statistics, it rains in Cordova 21 days of the 30 days in September. This rain totals on average over 20 inches in September alone. It is not uncommon to have rainfall of such an amount, that the Ibeck and Eyak Rivers raise to such a level and "muddy up" to a point that fishing becomes impossible. When this happens, it can actually take a long time for the Eyak and lower Ibeck to clear up to a point where fishing is possible again. The Eyak will almost surely have to drain out the murky water in Eyak lake and this takes a while, sometimes several weeks. There is also a tributary that dumps into the Ibeck right above the Copper River Highway and it stays muddy for quite a while after a precipitation event. Thus, the Eyak river and the lower Ibeck can be "unfishable" for sometimes weeks at a time.

When these events happen, most sportfishermen will have no other place to go except to the 3 mile section of the Ibeck above the road that is open now (it seems to clear up much quicker than the lower Ibeck) or 18 mile. If these areas are closed, the impact to sportfishing would be immense and immediate. I would estimate that the weather events described above happen often enough that the Ibeck and the Eyak are unfishable 30-50% of the time. If proposals 39 and 40 are adopted, I don't know of any of the approximately 100 sport fishermen we lodge per year that would be willing to continue coming to Cordova. The area 3 miles up from the Copper River Highway bridge was closed to sport

fishermen in 2011 to "protect the spawning beds." I can't see where it has had any effect on the numbers of Silvers in the river and the idea to close all of the area above the Copper River Highway now seems like a change that would only damage or destroy the entire sport fishing activities in Cordova. 18 mile (Silver Creek) is the same story. It stays clear when rains have made the Eyak and Ibeck unfishable. In addition, closing these two areas as proposed by numbers 39 and 40, would also have the undesirable effect of concentrating sport fishing on only the Eyak and lower Ibeck during the times they are fishable. The crowds would be packed in so tightly that the quality of the experience would be gone. It also doesn't seem healthy to me to have all the sport fishing concentrated in only a few areas. Without 18 mile (Silver Creek) and the 3 mile section of the Ibeck above the road to remain open, sport fishing in Cordova becomes unsustainable. I encourage you to ask the sport fishermen if this is true!

IN SUMMARY—I would like to take just a moment and let you know what is happening to the sport fishing on the Eyak, Ibeck, 18 mile (Silver Creek) and Alaganik slough areas in the Copper River Delta.

Generally, it seems as though the commercial openers that happen during the Coho season are having a much greater than normal detrimental effect on the numbers of Coho in these rivers during the commercial openers. Why the impact is greater, I don't know but now when an opener is on, there will be fish in the rivers on the day of the opener. I guess that is because they are in the river when the opener starts. But then, when the opener is on, it seems as though no fish can get into the rivers at all. This will persist for as long as the opener is on (24 hours, 36 hours, or continuous as it was in October for 11 straight days). After the opener is closed, then it takes a day or two for fish to repopulate the river systems. So if an opener is on for 24 hours, that will take fish out of the river for at least 2-3 days. Often, they will have two openers per week, so it greatly diminishes the time that fish are actually available in the river for sport fishermen to try and catch. In September of 2020, the commercial openers went from two 12 hour openers, usually on a Monday and Thursday, per week at the first of the month to one 12 hour and a 24 hour opener, to two 24 hour openers and finally at the end of September they were having two 36 hour openers per week. Then on the 1st of October, they went to a continuous 24/7 opener for 11 days straight. This basically ended the sport fishing from early to mid-September to the end of the season. I asked the commercial area manager why they did that and was told that the escapement goal had been reached and he had no choice except to permit commercial fishermen to fish after the escapement had been reached. I informed him that we still had guests and would have until about the 10th of October. It didn't seem to matter. He continued the openers which stopped basically all the sport fishing. I encourage you to ask Robyn Jensen at the Bear's Den cabins what her experience was with her guests. I think it was the same except her guests left before the end of September but still noted the same complaints.

I hope that somehow consideration of all aspects of the many demands on these fish can be met at least partially. Preservation of this wild salmon run in the Copper River Delta is extremely important to me. I want many generations of my family and others to be able to enjoy this experience far into the future.

Calvin K. Blohm
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801 787-6676



Submitted By
Cathy Renfeldt
Submitted On
11/15/2021 11:22:48 PM
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To the Members of the Board of Fisheries:

As the Executive Director of Cordova Chamber of Commerce, 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). I urge the Board of Fisheries to reject Proposals 49 - 55 due to the damage they would inflict on salmon fisheries across the southcentral region and the decreased hatchery production that would result if these proposals were implemented. My organization represents more than 125 businesses that rely on the economic health of Cordova and the greater Prince William Sound region. Not surprisingly, robust fish returns are vital to the economic well being of so many businesses across our region. Should Proposals 49-55 be approved, the economic impact would be severe to many local businesses and could ripple through the Cordova economy in disastrous ways.

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. PWSAC was founded in 1974 and 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. Alaska's 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 benefit the communities, economy, and harvesters.

PWSAC and VFDA 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, PWS hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall. PWSAC and VFDA 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.

Further, 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.

Respectfully,

Cathy Renfeldt

Executive Director





CDFU Seine Division
Kenneth Jones - Co Chair
Gregory Gabriel – Co Chair

November 12, 2021

Alaska Board of Fisheries
Prince William Sound
2021 Commercial Finfish Meeting

RE: Proposals 46

Dear Board of Fisheries Members:

The CDFU seine division **opposes Proposal 46** because it will likely lead to more interception of early run wild pink and chum salmon bound for the Northwest district and the Bettles Bay subdistrict, as well as wild sockeye salmon bound for Coghill lake. Lower returns to Coghill lake directly result in closures of the AFK chum harvest for the seine fleet. Additionally, after years of depressed wild pink and chum salmon runs in the NW and Coghill districts, the seine fleet is finally enjoying the benefits of restrictions imposed to prevent gillnet overharvest of these early timed runs.

Proposals 47 and 48 seek to minimize interception of fish bound for other areas by the gillnet fleet, Proposal 46 would increase interception of these salmon. The seine fleet tends to bear the brunt of closures in wild stock districts due to gillnet harvest. Although understandable that deep gear may facilitate harvest of hatchery produced chum salmon, it comes at a cost to the seine fleet. Otolith marked hatchery fish are accounted for in the allocation plan, but the wild stock harvest directly correlates with reduced time and area for the seine fleet. Should this board decide to allow deep gear prior to July 1st, then it would be prudent to restrict time and area to the gillnet fleet to the hatchery THA and SHA to expedite hatchery harvest while minimizing mixed stock interception of wild stocks.



CDFU Seine Division
Kenneth Jones - Co Chair
Gregory Gabriel – Co Chair

November 12, 2021

Alaska Board of Fisheries
Prince William Sound
2021 Commercial Finfish Meeting

RE: Proposal 43

Dear Board of Fisheries Members:

The CDFU Seine Division is opposed to Proposal 43 which would reopen the PWS Enhanced Salmon Allocation Plan (Allocation Plan) to include Valdez Fisheries Development (VFDA) enhanced salmon in the allocation calculations for gillnet, set gillnet, and seine.

The current Allocation Plan: Currently, the allocation percentages are based solely on the Prince William Sound Aquaculture (PWSAC) production. PWSAC production is available for all user groups, and all user groups contribute a 3% enhancement tax toward PWSAC costs of production. Additionally, the cost recovery and broodstock collection of PWSAC production impacts each user group and is baked into future triggers for time and area. For example, if the gillnet stakeholders fall below 45% of the PWSAC allocation based on a five year rolling average, they have exclusive access to the Port Chalmers remote release site. Port Chalmers is an historic seine harvest area.

By the same token, if the seine fleet falls below 45% based on the five year rolling average, they have exclusive access to the WHN chums returning to Lake Bay, which is a gillnet only area until July 21st.

This compromise eliminated wild stocks and VFDA harvests from the plan and has achieved parity between the fleets regarding PWSAC production. The current plan was the culmination of years of negotiations, special committees, and numerous board proposals.

Please read Mr. LeRoy Cabana's written testimony in opposition to proposal 43. Mr. Cabana succinctly states the history and current allocation percentages that have occurred over time, and the seine division strongly supports Mr. Cabana's testimony.

Also, please see Board Findings 97-02-FB and 06-248-FB as referenced in staff comments.

Earlier versions of the Allocation Plan: Earlier versions of the allocation plan included wild stocks and VFDA stocks, and percentages were based on the entire ex-vessel value of PWS salmon harvests. There was no "piggy bank" or trigger points. Pink prices were at historic lows, and the Copper River Sockeye prices were high, as were chum prices relatively speaking. The seine fleet was going bankrupt at an alarming rate and the drift gillnet fleet was the highest



grossing gillnet permit in the state. Attempts to achieve parity were futile because the only mechanism for the seine fleet rested on the illusory “future production” and that prices would eventually rebound.

The disparity was reflected in the permit prices listed by the Commercial Fisheries Entry Commission. Assuming the permit price represents the net present value of the cash flow for each gear type, a simple examination of historic and present permit prices demonstrates that the plan is now working as intended. In 2003 the mean time weighted value of a seine permit was \$19,700 and a gillnet permit was valued at \$51,900. A gillnet permit was worth over 2.6 times a seine permit. It is important to point out that there are 547 gillnet permits and 268 seine permits. If the permit values represented parity in the allocation percentages, a seine permit should be worth approximately twice a gillnet permit.

In 2020 the mean time weighted value of a seine permit was \$153,900 and a gillnet permit was valued at \$128,500 which would indicate a market expectation that a gillnet permit would outperform the allocation percentage relative to a seine permit, but also reflect that we are closer to parity.

Gillnet proponents argued that the disparity was due to their success at marketing Copper River Sockeye salmon as well as the extraordinary low pink prices, and negotiated for removing wild stocks from the plan as a mechanism to alleviate the disparity. This would have created an illusory gain for the seine fleet, and therefore the VFDA production was also removed from the plan. One glaring oversight occurred with the new plan. Particularly, the seine fleet lost access to Coghill wild sockeye in the original 1991 plan and did not regain access to those fish under the new allocation plan.

The effect of Proposal 43 would be to give the gillnet fleet exclusive access to the Port Chalmers historic seine area in most years: As ADF&G stated in their staff comments “[A]dding this value to the purse seine allocation would increase the likelihood of allocation imbalance and increase the frequency that the drift gillnet fleet would have access to Port Chalmers chum salmon.” See RC 2 pg 154. Ultimately, this appears to be the goal of this proposal and it should be rejected by this Board because it will tip allocation scales in favor of the gillnet fleet by including production that the gillnet fleet does not bear the burden of producing. The cost of VFDA produced salmon is carried out through cost recovery, which is supported by reduced fishing time for the seine fleet. The gillnet fleet does not contribute to the cost of VFDA, but receives the benefit of incidentally harvesting these fish **and not having them counted against them in the allocation plan.** As stated on the VFDA website: “**VFDA is not a regional aquaculture association and collects no tax revenues from local fishermen. Its primary revenue source comes from the sale of pink salmon to the local seafood processors. Salmon sales account for almost 100% of the funds necessary for hatchery operations, administration, and debt retirement. Capital loans are available through the Fisheries Enhancement Revolving Loan Fund, which is managed by the State of Alaska.**” <https://www.valdezfisheries.org/about-vfda/> *emphasis added.*

Currently, the drift gillnet fleet is seeing the effects of low chinook and sockeye abundance on the Copper River, as well as fierce competition upriver for the resource. This competition



further exacerbates the reduced income the fleet is currently experiencing in that fishery. The answer to this swoon in harvest opportunity should not be addressed by including VFDA harvests into the allocation plan as a way to increase time and area for the gillnet fleet. However, in the event this board chooses to reopen the allocation plan to include VFDA stocks, this board should also correct the oversight of excluding the seine fleet from harvesting Coghill sockeye.

For the foregoing reasons, this board should **reject Proposal 43**.

Thank you,

Greg Gabriel
Ken Jones
Co-Chairs
Cordova District Fisherman United
Seine Division



CDFU Seine Division
Kenneth Jones - Co Chair
Gregory Gabriel – Co Chair

November 12, 2021

Alaska Board of Fisheries
Prince William Sound
2021 Commercial Finfish Meeting

RE: Proposals 56 and 57

Dear Board of Fisheries Members:

The CDFU seine division supports proposal 57 and proposal 56 should be rejected **in favor of proposal 57**. Proposal 56 would increase the depth of a purse seine in PWS from 325 mesh to 450 mesh and increase the length from 225 fathoms to 250 fathoms for vessels utilizing two permits, known as “stacking”. Proposal 57, on the other hand proposes only to allow an extra length of seine for vessels utilizing stacked permits.

Reasons this board should approve permit stacking: Prince William Sound seine permits are utilized at nearly 100% some years, similar to Southeast seine permits prior to their buyback. The opportunity to implement a buyback has not occurred in PWS, in part due to lack of funding to the NMFS program that administers the buyback loans. The PWS fishery is managed in short duration openers, typically 12 or 14 hours long as compared to Kodiak which is routinely open for over 150 hours at a time. Additionally, the seines in PWS are 225 fathoms, the shortest in the state. Other seine fisheries utilize 250 fathom seines. Allowing stacking permits will likely lower the overall number of vessels fishing and therefore actually lead to a reduction in aggregate gear in the water at one time. Stacking will provide opportunity for new entrants to purchase permits and work on a vessel at a higher crew share. A vessel that takes on a new entrant is rewarded by the ability to fish more gear. Opportunity, sustainability and stability in the seine fishery would be enhanced by allowing permit stacking.

Proposals 56 and 57 both seek the same outcome, which is to reduce congestion while providing entry level opportunity. Proposal 57 would reduce the likelihood of cheating and make enforcement easier. In the event the additional permit is no longer participating with a vessel, Proposal 57 would require a 225 fathom net. This could be accomplished by detaching the additional 25 fathoms, or by swapping out seines. However, Proposal 56 would require swapping seines. In the event a seine had additional length sewn on, the additional length would have a different color corkline that could be removed. Whether the length of the net was changed is easily observable. However, the depth of a net is not easily observable and could lead to enforcement issues. Due to budget constraints, sometimes enforcement is not on the fishing grounds. However, another seiner can easily distinguish the length of a net simply by setting alongside for salmon swimming the opposite direction. It is unfortunate that this must be a consideration, but fleet enforcement is definitely a tool the Department of Public Safety relies upon.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 participate in commercial, subsistence, and sport salmon fisheries in the Prince William Sound region. Having lived in Cordova since 1974, I am fortunate to have been employed by PWSAC for several years before retirement, and engaged in commercial fishing for many years prior. Our family has been involved in various commercial fishing endeavors for four generations, three in the Prince William Sound Alaska, our livelihoods sustained by the bountiful salmon resource. Salmon hatcheries were introduced in the 1970's with skepticism felt by many; since then the hatcheries have proved themselves as beneficial in enhancing the salmon resource for many user groups, providing considerable employment opportunities, and aiding the economies of communities in the area. More comments in that regard to follow. With concerns for the Copper River salmon resource population, reasonable, non-political management and greater enforcement covering the Copper River area becomes more imperative.

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,

Cecilia Wiese
cecewese@gmail.com
(907) 424-3667

Submitted By
Chad poppe
Submitted On
3/7/2021 6:17:42 AM
Affiliation



PC033
1 of 1

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Juneau , Alaska 99801

I support permit stacking in the seine fishery in Prince William Sound. We need to reduce the number of boats to keep the fishery viable.

Submitted By
Charles Frey
Submitted On
11/8/2021 12:50:03 PM
Affiliation



PC034
1 of 1

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cfrey09@gmail.com
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ANCHORAGE, Alaska 99502

My family and I enjoy the opportunity to harvest salmon in the Upper Copper River Personal Use fishery at Chitna. We have used a boat for several years and find this to be a safer and more enjoyable method to harvest the 15 or so salmon we consume throughout the fall & winter. Very few individuals spent the effort to drive their boats all the way out to Chitna so there are generally very few boats on the water at one time. I have never seen of or had any issues with other boaters being reckless or endangering others as is commonly seen on the Kenai Peninsula during the Kenai dipnet fishery. Proposals 7-17 are an attempt to limit access to a resource that has provided nourishment to Alaskans for many years with NO science to back up these proposals. All Alaskans should be allowed the continued opportunity to harvest salmon on the Copper while paying the new permit access fee...

My family is opposed to the following proposals: Proposal 7-17, Proposal 20.

Prince William Sound area: We are not inclined to support Proposals 23, 24, 26, 32, 33, 34. While there are still salmon swimming around, trout should be mostly left as catch and release. They don't freeze up as well as salmon and don't last as long in the freezer with most people never eating them or feeding the trout to their dogs...

Submitted By
Charles Perrett
Submitted On
11/14/2021 10:32:08 PM
Affiliation



PC035
1 of 1

Phone
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Address
Po Box 53
Mile 182 Glen Hwy
Glennallen, Alaska 99588

Concerning the proposed dipnetting changes to the copper river fishery. This fishery is a lifeline of subsistence to many Alaska residents. We depend on access and many of these restrictions will cripple our ability to safely put up our winter meat. I've lived in the Copper River valley for 65 years and it amazes me to hear people who have only been here for 10 or 20 years think they know whats best for us. There for be it heard: I strongly oppose proposals 6 through 17 I strongly oppose proposals 19 and 20. I support proposals 18, 21 and 22.



November 15, 2021

Via Email: dfg.bof.comments@alaska.gov

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

Re: Support for Proposals 26 and 27

Dear Board Members,

The Chenega Corporation (“Chenega”) urges the Board of Fisheries to adopt Proposals 26 and 27 at the 2021 Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish regulatory meeting in Cordova.

Chenega is the Alaska Native Village Corporation for the village of Chenega in western Prince William Sound, formed pursuant to the Alaska Native Claims Settlement Act. In 1971, Congress granted The Chenega Corporation approximately 70,000 acres of land in western Prince William Sound as a settlement in recognition of Alaska Natives’ land claims. Chenega has a strong interest and commitment to the social-wellbeing and cultural heritage of Chenega tribal members and residents of the village of Chenega.

Proposals 26 and 27 are important steps to permit Chenega stakeholders to continue their traditional subsistence way of life.

Proposal 26 would grant the Native Village of Chenega a permit to harvest up to 1,000 sockeye and 50 king salmon for distribution to tribal members. For many, harvesting subsistence salmon with drift or set gillnets requires boats, gear, and money for fuel, which is simply not available. For others, age or infirmity prevents them from catching enough fish for their freezer. By granting a permit to the Native Village of Chenega, Proposal 26 would make subsistence salmon harvests more widely available to Chenega’s residents and shareholders.

Proposal 27 would enhance subsistence by opening fishing times to seven (7) days a week. Now, subsistence harvesters are forced to compete for fish with commercial harvesters in narrow time frames. In addition, bad weather hampers subsistence fisherman unequally. Small boats are shut down in weather when larger commercial vessels can keep fishing. These factors – short time frames, competition with commercial vessels, and weather – combine to constrain or (in some years) even eliminate any subsistence harvest in Chenega.



Alaska Board of Fisheries
Page 2
November 15, 2021

Similar to commercial fisherman, salmon is our livelihood and our economy. The total catch by Chenegans is a tiny fraction of the Prince William Sound commercial harvest. Proposals 26 and 27 would enable our people to continue subsistence fishing without disturbing the commercial fleet or resulting in an overharvest.

These are relatively minor, but important changes that the Board can make to improve access to subsistence salmon fishing in Prince William Sound.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles W. Totemoff", written over a horizontal line.

Charles W. Totemoff
President & CEO
The Chenega Corporation



Chitina Dipnetters Association
PO Box 72665
Fairbanks, AK 99707
Chuck Derrick, Pres.
cderrick@chitinadipnetters.com

The Chitina Dipnetters Association Comments on 2020 BOF PWS/Copper River finfish proposals

Prop. 5 **support**

Establish a Optimum Escapement Goal (OEG) for Copper River chinook salmon, increasing the escapement goal to 24,000-40,000.

Prop. 6 **oppose**

Require in season reporting of harvest for the upper Copper subsistence, sport and personal use fisheries.

Would require rather than end of season harvest reporting that you report daily harvest within 3 days of catch. This is a recurring BOF proposal and has been rejected by the BOF each time mainly because F&G says in-season reporting is not needed to manage these upriver fisheries. Management of these fisheries and the in-river salmon goal is dictated by actual daily sonar counts at the Miles Lake sonar

Prop. 7 **oppose**

Prohibit guiding in subsistence finfish fisheries.

Many people rely on guided dipnet harvest to supplement their annual family food supply.

Prop. 8 **oppose**

Prohibit dipnetting within 500yds below and 100 yds. above any stream entering the Upper Copper River.



This would eliminate dipnetting near O'Brien and Haley creeks and if I'm right, any creek entering the Copper, further limiting harvest opportunity. Dipnetting is already limited to the mainstream of the Copper River and prohibited in any stream entering the Copper.

Prop. 10 & 11 **oppose**

Prohibit dipnetting from a boat in the Upper Copper River District.

Dipnetters have a set annual limit and once that limit is reached they are done for the year. Dipnetting from boats is a popular means of obtaining that limit.

Prop.12 **oppose**

Prohibit dipnetting from a boat when within 50' of a person dipnetting from shore in Chitina Subdistrict.

Talk about an enforcement nightmare.

Prop, 13 **oppose**

Prohibit dipnetting from a boat within 75' of any operating fish wheel.

Enforcement nightmare.

Prop. 14 &15 **oppose**

Prohibit use of gillnet mesh in dipnets because it harms king salmon to be released that are tangled in the mesh.

In my experience, the only problem with releasing fish from gill net mesh is the smaller sockeyes that actually get stuck halfway through the mesh. King salmon, no such problem.

Prop. 16 **oppose**

Prohibit the use of depth or fish finders on boats in the upper Copper River District.

Should we prevent such use in the commercial fisheries?

Prop. 18 **Support**

Extend lower boundary of the Chitina subdistrict 1/2 mile downstream.



Chitina Dipnetters Association submitted proposal. This is a safety issue. A favorable and high use area for drift dipnetting from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the lower boundary of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with up to and over 15 boats drifting the same area. This congestion of boats has created a very dangerous navigation hazard for these boaters within the swift waters of the Copper River. Extending the existing CPUDF lower boundary ½ mile downstream would allow boat dipnetters a longer continuous drift, allowing more spacing between boats, and alleviate the dangerous congestion of boats that occurs now.

Prop.19 **oppose**

When by June 1 the commercial harvest is 50% below the 10 year average, then the Chitina Personal Use sockeye allocation would be reduced from 150,000 to 50,000.

The P. U. harvest times and lengths are dictated by actual sonar counts. When run numbers are low it will show in the sonar counts and F&G will reduce the PU dipnet opening times and lengths accordingly to meet in-river goals. When commercial harvests are low it is reflected in low sonar counts triggering reduced fishing time in the PU fishery. To reduce the PU fishery allocation on top of reduced fishing time is a double hit. If the run rebounds 2 weeks later, the PU fishery would still be stuck with a 2/3s allocation reduction.

Prop. 20 **oppose**

Reducing the annual limit in the Chitina subdistrict to 15 salmon for a household of one and 30 salmon for a household of more than one.

CDA fought hard to get the PU annual limit raised to 25 for the permit holder and 10 fish for each additional household member. It standardized the PU annual limit between south central Alaska PU fisheries and the Chitina PU fishery, thus eliminating confusion between the PU fisheries and also making it a more equitable harvest for larger families. F&G supported this proposal at the 2014 PWS/Copper River finfish BOF meeting.

Prop. 21 **support**

Amend the opening date of the Chitina PU. fishery from June 7 to June 1.



If salmon sonar numbers warrant it then the Chitina PU fishery should open On June 1 as it did in the past.

Prop. 22 **support**

Eliminate the Customary and traditional finding for finfish other than salmon in the Chitina subdistrict.

If there is no customary and tradition finding for salmon in the Chitina Subdistrict, then why should there be a positive finding for other finfish?

Prop. 41 **oppose**

Repeal mandatory closed waters from the Copper River King Salmon Management Plan.

Mandatory inside closures during commercial fishing statistical weeks 1&2 were initiated to protect those early run kings, that thru F&G radio telemetry programs, were determined to be those fish that go farthest upriver to spawn and supply the upper Copper subsistence fishery. To say that in the last several years the king salmon population has been healthy is a stretch as I remember upwards 20 years ago that today's total annual king run for the Copper River of say 60,000 chinooks is what the commercial fishermen out of Cordova were harvesting back then and we still met the total in-river goal.



Chitina Dipnetters Association

Public Comments Concerning Submitted Proposals To The December 2021 PWS/Upper Copper and Upper Susitna Finfish BOF Meeting

In reference to CDA comments on proposal 18, we have attached to this email a map showing the proposed lower boundary change, the existing lower boundary and current drift area. We also intend to, during CDA public testimony, show a video of the boat congestion.

Prop. 5 - **support**

Establish an Optimum Escapement Goal (OEG) for Copper River chinook salmon, increasing the escapement goal to 24,000-40,000.

Prop. 6 - **oppose**

Require in season reporting of harvest for the upper Copper subsistence, sport and personal use fisheries.

This would require that dipnetters report daily harvest within 3 days of catch rather than end-of-season harvest reporting. This is a recurring proposal to the BOF. It has been rejected by the BOF each time mainly because F&G says in-season reporting is not needed to manage these upriver fisheries. Management of these fisheries and the in-river salmon goal is dictated by actual daily sonar counts at the Miles Lake sonar.

Prop. 7 - **oppose**

Prohibit guiding in subsistence finfish fisheries.

Many people rely on guided salmon dipnet harvest to supplement their annual family food supply. Subsistence C&T criteria #3 calls for “a pattern of use consisting of methods and means of harvest characterized by



efficiency and economy of effort and cost”. For many dipnetters who do not own a boat and because in the Glennallen Subdistrict there is extremely limited access to publicly owned river shoreline for shore based dipnetting, using a guided dipnet service is their most efficient and economical means of participating in this fishery.

Prop. 8 - oppose

Prohibit dipnetting within 500yds below and 100 yds above any stream entering the Upper Copper River.

This would eliminate dipnetting near the mouths of O'Brien Cr, Haley Cr., the Chitina River and, if I read it right, any small creek entering the Copper, further limiting harvest opportunity. Dipnetting is already limited, by regulation, to the mainstream of the Copper River and prohibited in any stream entering the Copper.

Prop. 9, 10 & 11 - oppose

Prohibit dipnetting from a boat in the Upper Copper River District.

Public access along the Copper River is very limited for shore based dipnetting, especially in the Glennallen sub-district of the Upper Copper River District. Because access is limited, many dipnetters have opted to use their own boats to access the river and to dipnet salmon. Dipnetters have a set annual limit and once that limit is reached, they are done for the year. Dipnetting from boats is a popular means of obtaining that limit.

Prop.12 - oppose

Prohibit dipnetting from a boat when within 50' of a person dipnetting from shore in Chitina Subdistrict.

Talk about an enforcement nightmare.

Prop, 13 - oppose

Prohibit dipnetting from a boat within 75' of any operating fish wheel.



Enforcement nightmare.

Prop. 14 & 15 - oppose

Prohibit use of gillnet mesh in dipnets because it harms king salmon to be released that are tangled in the mesh.

Alaska regulation 5AAC 39.105 states a dipnet mesh must be less than 4.5" stretch mesh. In my experience, the only problem with releasing fish from gillnet mesh is the smaller sockeyes that actually get stuck halfway through the mesh. King salmon, no such problem.

Prop. 16 - oppose

Prohibit the use of depth or fish finders on boats in the upper Copper River District.

The only person I know that tried to use a fish finder in the Copper said it was of little use in the fast, heavily silted water.

Prop. 17 - oppose

Establish specific permit and bag limits when dipnetting from a boat in the Glennallen subdistrict. (The Glennallen subdistrict is the subsistence area upstream of the bridge, not a personal use area.)

Access to shore based dipnetting upstream of the bridge is very limited due to private land ownership and few roads accessing the river. Dipnetting from boats is a means by which some people are able to harvest their salmon. Shore and boat dipnetting should continue under a unified permit structure – there is already a checkbox for selecting gear type when applying for the permit.

Prop. 18 - support

Extend lower boundary of the Chitina subdistrict 1/2 mile downstream.

This is a Chitina Dipnetters Association submitted proposal to address a



safety issue. A favorable and high use area for drift dipnetting from June 1 to September 15 lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the lower boundary of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free, saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with up to and over 15 boats drifting the same area. Extending the existing CPUDF lower boundary ½ mile downstream would allow more spacing between boats, and alleviate the congestion of boats that occurs now.

Prop.19 - **oppose**

When by June 1 the commercial harvest is 50% below the 10 year average, then the Chitina Personal Use sockeye allocation would be reduced from 150,000 to 50,000.

Chitina Personal Use fishing periods and the time lengths of those periods are dictated by actual miles lake sonar counts. When run numbers are low, it shows in the sonar counts and F&G reduces the PU dipnet opening times and lengths accordingly to meet in-river goals. When commercial harvests are low it is reflected in low sonar counts triggering reduced fishing time in the PU fishery. To reduce the dipnet allocation on top of reduced fishing time is a double hit. If the run rebounds 2 weeks later, the PU fishery would still be stuck with a 2/3s allocation reduction.

Also, when the May Cordova commercial drift gillnet harvest indicates a weak king salmon run but a healthy sockeye run, the commercial fleet will be shut down due to king mortality in drift gillnets. This could easily cause the by June 1 commercial harvests to fall below 50% of the 10yr. average and trigger the allocation reduction for dipnetters. In the Chitina PU dipnet fishery if king salmon retention is prohibited, they can be release immediately and sockeye retained for the users bag limit. In this scenario, the commercial shutdown should not result in dipnet fishery non-retention of sockeye or a reduction in harvest allocation.

Prop. 20 - **oppose**

Reducing the annual limit in the Chitina subdistrict to 15 salmon for a



household of one and 30 salmon for a household of more than one.

At the 2014 Cordova PWS/Copper River finfish BOF meeting, CDA fought hard to get the Personal Use annual limit raised to 25 for the permit holder and 10 fish for each additional household member. It standardized the PU annual limit between South-Central Alaska PU fisheries and the Chitina PU fishery(which F&G supported), thus eliminating confusion between the PU fisheries and making it a more equitable harvest for larger families.

Prop. 21 - support

Amend the opening date of the Chitina PU. fishery from June 7 to June 1.

If salmon sonar numbers warrant it then the Chitina PU fishery should open On June 1 as it did in the past.

Prop. 22 - support

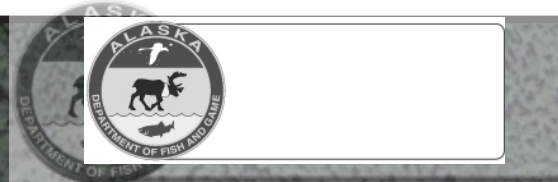
Eliminate the Customary and Traditional finding for finfish other than salmon in the Chitina subdistrict.

If there is no customary and tradition finding for salmon in the Chitina Subdistrict, then why should there be a positive finding for other finfish?

Prop. 41 - oppose

Repeal mandatory closed waters from the Copper River King Salmon Management Plan.

Mandatory inside closures during commercial fishing statistical weeks 1&2 were initiated to protect those early run kings, that thru F&G radio telemetry programs, were determined to be those fish that go farthest upriver to spawn and supply the upper Copper subsistence fishery. To say that in the last several years the king salmon population has been healthy is a stretch as I remember upwards 20 years ago that today's total annual king run for the Copper River of say 60,000 is what the commercial fishermen out of Cordova were harvesting and we still met the total in-river goal.



Halley Creek

Current PU Limit

61°24'37.00"N
144°29'3.00"W

Proposed PU Limit

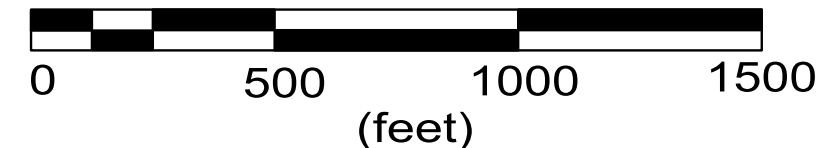
(Recapture Station ~ 1.4 miles down river
from lower limit of Proposed PU Limit)

61°24'30.00"N
144°28'39.00"W

Canyon Creek

Lower Limit Drift +/- 250 yards
Changing water conditions have
made this 250 yard drift the only
productive section of the PU fishery
resulting in navigation hazards
from overcrowding.

APPROXIMATE SCALE



Submitted By
Chris Kendrick
Submitted On
11/15/2021 3:31:40 PM
Affiliation



PC038
1 of 1

Phone
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Email
Ckendrick@gci.net
Address
2701 Flyway
Anchorage, Alaska 99516

I would like to submit a comment voicing strong opposition to a series of proposals restricting the use of a boat to fish in the Glennallen Subdistrict subsistence fishery on the Copper River. I am a 75-year-old disabled veteran. I have been an Alaskan resident since 1969. I am strongly opposed to any regulations which would barr me from using my boat to access the copper river for subsistence fishing. I have limited mobility which would prevent me from fishing from the shore. I do not have the financial means to purchase or construct a fish wheel. I feel like if you pass these proposals you have locked me out of my traditional fishery.

Submitted By
chris thomas
Submitted On
11/15/2021 1:56:19 PM
Affiliation



PC039
1 of 2

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Chris Thomas

Setnet and Drift Permit Holder

PWS

Proposal 42-OPPOSE

Proposal 42 is asking the board to consider amending the allocation formula by lowering the trigger point of the setnet group

The allocation formula and penalty measures that exist for the Setnet group are effective and working as intended... The adage of "if it's not broke, don't fix it" is completely applicable here.

From 2006 to 2020 the setnet group has only been out of compliance 4 years. Of those four there have only been two consecutive years where compliance was not reached. Never in the past has the group been out of compliance three years in a row. The corrective measures work.

Historically low seine harvest years weigh heavily on the overall picture of allocation. Both the Seine and Drift fleets have corrective measures to help achieve balance after a low harvest year. The setnet group not only has no corrective tools for low harvest years, it is also limited to only one district and cannot move to another area if harvest numbers and returns are poor.

The last two years have demonstrated this difficulty. The Eshamy district was shut down for several periods near the peak of the season. The setnet group sat on the beach while the drift Fleet moved elsewhere.

Simply put, this is an effort of a 500+ member group trying to bully the smallest gear group of Prince William sound. They have the numbers and the finances to create a "show"

I ask that you please not allow it to happen.

Please do not approve proposal 42. 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 43-SUPPORT

Proposal 44-OPPOSE

Proposal 44 is asking the board to consider amending the allocation formula by altering the penalty measures imposed on the setnet group if the group is out of compliance with the allocation formula

The allocation formula and penalty measures that exist for the Setnet group are effective and working as intended... The adage of "if it's not broke, don't fix it" is completely applicable here.



From 2006 to 2020 the setnet group has only been out of compliance 4 years. Of those four there have only been two where compliance was not reached. Never in the past has the group been out of compliance three years in a row. The measures work.

Historically low seine harvest years weigh heavily on the overall picture of allocation. Both the Seine and Drift fleets have corrective measures to help achieve balance after a low harvest year. The setnet group not only has no corrective tools for low harvest years, it is also limited to only one district and cannot move to another area if harvest numbers and returns are poor.

The last two years have demonstrated this difficulty. The Eshamy district was shut down for several periods near the peak of the season. The setnet group sat on the beach while the drift Fleet moved elsewhere.

Simply put, this is an effort of a 500+ member group trying to bully the smallest gear group of Prince William sound. They have the numbers and the finances to create a "show"

I ask that you please not allow it to happen.

Please do not approve proposal 44. 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 This could significantly reduce the gear conflict in the Main Bay THA.

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

Submitted By
Christopher M Forrest
Submitted On
11/7/2021 11:53:27 AM
Affiliation
Citizen



PC040
1 of 1

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North Pole, Alaska 99705

Salmon fishing is extremely important to my family. We use this to keep fresh fish as a strong source of food for our family along with other game meat that is better all-around vs the heavily processed meat found in grocery stores.

We typically fish above the bridge with a guide so that we are safe. The guide is very important to insure we are safe and well taken care of. My son started fishing this way at age 11. His safety is paramount and fishing from a rock or wading in is too dangerous. Getting rid of guides or personal boats is a dangerous thing to do. Every year someone dies on that river from not tying off properly.

Do not destroy one of the few things that Alaska has to offer our citizens that is unique to our State. If you cared about the salmon, you would be limiting the commercial fisheries much more than you do than by hurting Alaskans that utilize this resource for crucial dietary needs.

Proposal 6 - Oppose!
Proposal 7 - Strongly Oppose!
Proposal 8 - 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 18 - Strongly Support!
Proposal 19 - Strongly Oppose!
Proposal 20 - Strongly Oppose!
Proposal 21 - Support!
Proposal 22 - Support!

Thank you for listening. Please do the right thing.

Chris Forrest

Submitted By
Christopher L Maxcy
Submitted On
11/12/2021 5:06:20 PM
Affiliation



PC041
1 of 2

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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. I believe that the decisions made regarding these proposals will either have a positive or a very negative impact on both the economic viability of Copper River salmon and its future as a resource for all user groups.

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.

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.

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.

Proposal 21: I oppose increasing the personal use season when the commercial fleet has seen unprecedented closures due to concerns over the health of the fishery resource.

Proposals 38, 39, 40: I **strongly support** these proposals because they are needed to conserve our coho returns. fisherman all of my life, however, there has been unprecedented pressure from sport fishermen and it is negatively impacting resource and the fishing experience.



PC041
2 of 2

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.

Proposal 75: I **oppose** this proposal because it is also not based on independent scientific data.

Best regards,

Christopher L. Maxcy

https://docs.google.com/document/d/1KXpbKZZ6_D_bJlcH9DX1s60pGRnrly3QUFfKwSbmoW8/edit?usp=sharing



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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. I am the VP of Food Safety, QA & Regulatory Affairs for OBI Seafoods. Our company has sites in Cordova and Seward and actively participates in the PWS 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.

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,

Cindy Luna
cindy.luna@Obiseafoods.com
(206) 683-2619



November 3, 2021

Board of Fisheries

RE: Opposition to Proposals 49-55, Compromising the Critical Role of Salmon Hatcheries

The City of Cordova supports science-based management of fisheries for the benefit of all user groups. Healthy hatchery and wild stocks coexist in Prince William Sound. My review of historical records reveal that wild salmon stock abundance often coincides with hatchery stock abundance indicating that other external factors influence the health of wild stocks. The reduction of hatchery stocks through incremental policy changes such as those proposed in proposals 49-55 severely undermines a key component of commercial, sport, subsistence, and personal use fisheries.

I have reviewed proposals 49-55 and do not note a directly cited scientific basis for opposing hatchery operations in Prince William Sound which are so critical for funding the health, education, social, employment, and food needs of the area's communities including Cordova. The February 2020 issue of the Alaska Economic Trends highlights the prosperity and social value that strong fisheries bring to Cordova pp 9-10: <https://labor.alaska.gov/trends/feb20.pdf> I can only wish the success of base economies like this for every community in Alaska. As I met with our School Board this week to try to address declining State and City of Cordova funding for education, I encouraged participation in the Board of Fish meetings to communicate the economic and social importance of our sustainable primary economy in Cordova, seafood production.

I encourage you to vote against these proposals and seek a more productive path of science-based approaches to try to better understand how human impacts, habitat loss, climate change, fisheries bycatch, predator populations, and a myriad of other variables are affecting the health of certain salmon stocks before restricting critical hatchery stocks that frankly help diversify the catch pressure away from wild stocks.

The Board should also encourage proposals to supplement the use of hatcheries not only for salmon production, but for the growing aquaculture and mariculture industries which may compatibly enhance wild salmon stocks while producing additional revenue streams and opportunities.

Respectfully,

Clay Koplin, Mayor
City of Cordova, Alaska
PO Box 1210
Cordova, AK 99574
(907) 253-5026 M, mayor@cityofcordova.net



**CITY OF CORDOVA, ALASKA
RESOLUTION 11-21-41**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF CORDOVA, ALASKA,
SUPPORTING CERTAIN PROPOSALS AND OPPOSING OTHER PROPOSALS THAT
WILL BE CONSIDERED BY THE ALASKA BOARD OF FISHERIES AT ITS
MEETING IN CORDOVA NOVEMBER 30-DECEMBER 6, 2021**

WHEREAS, Cordova's City Council recognizes the challenges facing the Alaska Board of Fisheries and understands the difficult deliberations that the Board will be undertaking this cycle as it meets with a goal to conserve and maintain the fishery resources of the state; and

WHEREAS, while the decisions made, and the regulations adopted by the Board will be far-reaching, they will be most consequential in Alaskan coastal cities such as Cordova where commercial fishing is the primary economic driver and the life-blood of the community; and

WHEREAS, the Copper River Flats Drift Gillnet fishery has seen a marked decline over the last several years which has significantly negatively affected the City of Cordova via lost revenue in lower raw fish taxes, in lower sales taxes due to less money spent locally on goods and services which trickles down to every facet of the economy here; and

WHEREAS, CDFU (Cordova District Fishermen United), a well-informed, industry leader has submitted many proposals to be considered at the Board of Fisheries meetings in Cordova; and

WHEREAS, CDFU's different divisions, CDFU's officers and staff members have spent many hours preparing proposals and also studying and considering the ramifications and impacts of other proposals that have been submitted; and

WHEREAS, Cordova's City Council represents the voters and citizens of Cordova and owes an allegiance to the processing plants that are well-established here, to the hatcheries in PWS that contribute immensely to the economy of the region, to the many commercial fishing businesses that are home-ported here and to the locally owned, ancillary businesses that support the fishing fleets; and

WHEREAS, proposals that the City of Cordova is inclined to support are ones that most importantly are beneficial to the salmon hatcheries and the commercial fishing industry while still respecting quantifiable science and are rooted in conservation of resources for future generations; and

NOW, THEREFORE BE IT RESOLVED THAT the Council of the City of Cordova, Alaska, relying on the expertise of CDFU and other industry professionals hereby declares to the Alaska Board of Fisheries its support of certain proposals and its opposition to other proposals; and

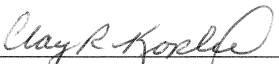


BE IT FURTHER RESOLVED THAT the Council of the City of Cordova, Alaska does hereby support proposals: 1 (diversification into different fisheries would be beneficial for Cordova fishermen), 6-10, 14, 15, 19 (these seven proposals aim to responsibly regulate sport and personal use), 38-40 (these will protect the diminishing Coho returns in light of unprecedented pressure from sport fishermen), 61-67, 69-72 (these would increase winter fishing opportunities allowing for more economic diversification for the fleet, more crew member jobs; the City and support businesses in Cordova would thereby also benefit), 247, 248, 252 and 253; and,


BE IT FURTHER RESOLVED THAT the Council of the City of Cordova, Alaska does hereby oppose proposals: 5, 18, 21 (commercial fleet has seen unprecedented closures therefore, the personal use fishery should not be allowed more area and time) 49-55 (these 7 proposals have no basis in science, hatcheries have been successful for over 40 years) and 75 .

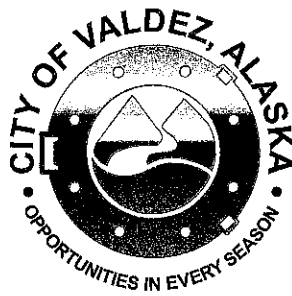
PASSED AND APPROVED THIS 10th DAY OF NOVEMBER 2021.




Clay R. Koplin, Mayor

ATTEST:


Susan Bourgeois, CMC, City Clerk



Alaska Dept. of Fish and Game
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

October 28, 2021

RE: PWS/UCSR Proposals 49-55

Dear members of the Alaska Board of Fisheries,

I am writing you today in support of Alaska's salmon hatcheries and in opposition of enhancement proposals submitted for the PWS/Upper Copper and Susitna Rivers Board of Fisheries meeting that seek to limit or reduce hatchery production in Prince William Sound.

The City of Valdez benefits greatly from our regional fisheries enhancement programs. Efforts by all Prince William Sound hatcheries greatly increases sport, commercial, and subsistence harvest opportunities in times of low abundance and provides for direct economic and social benefit to the community of Valdez.

This substantial economic benefit is realized through the creation of local seafood processing jobs and recreational tourism jobs, fisheries business tax, increased commerce through the Port of Valdez, and seafood industry investment in our community.

Economic impact studies by the McDowell Group revealed that in 2017 the Prince William Sound Aquaculture Corporation (PWSAC), headquartered in Cordova, contributed significantly to the regional economy by providing 1,405 jobs, \$68 million in labor income, and \$192 million in total economic output. Similarly between the years of 2012 and 2017 Valdez Fisheries Development Association, Inc. (VFDA), headquartered in Valdez, contributed significantly to the economy of Prince William Sound by providing 760 jobs, \$33.9 million in labor income, and \$112 million in total economic output.



VFDA hatchery production has created the largest Pink salmon sport fishery in Alaska. The VFDA Coho salmon sport fish program, which the City of Valdez sponsors each year to promote our summer economy, provides for an abundance of salmon to support the annual Valdez Silver Salmon Derby, the Valdez Women's Silver Salmon Derby, and the Kids Pink Salmon Derby.

This world-class sport fishery greatly increases summer tourism, and was credited in 2016 for bringing an estimated 28,000 anglers to fish Valdez. These salmon further benefit local commerce through the sale of sporting goods, boat rentals, custom processing, lodging and RV camping, fuel, harbor moorage, fishing charters, and other purchases estimated to be \$9 million annually.

Alaska's salmon hatchery programs are permitted using strong scientific methodology, and are built upon sound and sustainable fisheries policies intended to protect wild salmon populations. Our hatchery programs have a long history of sustainable and responsible fisheries enhancement.

The City of Valdez strongly supports both VFDA and PWSAC and submitted Resolution 18-33 to previously affirm that support. We strongly encourage the Alaska Board of Fisheries to reject all proposals that seek to diminish these great public private partnerships by reducing hatchery production. Such actions will no doubt hinder our coastal economies and reduced opportunities for Alaskans to harvest these renewable salmon resources.

We thank you for the opportunity to submit our comments and look forward to your continued support of Alaska's Salmon Hatchery Programs.

Sincerely,

A handwritten signature in blue ink that reads "Sharon Scheidt".

Sharon Scheidt
Mayor-City of Valdez



CITY OF VALDEZ, ALASKA

RESOLUTION NO. 18-33

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VALDEZ,
ALASKA, SUPPORTING THE ALASKA SALMON HATCHERY PROGRAM**

WHEREAS, the City of Valdez benefits greatly from the State of Alaska Hatchery Program; and

WHEREAS, Alaska's salmon hatchery program has operated for 45 years and supplements wild salmon harvests throughout the state; and

WHEREAS, Alaska's salmon hatchery program is an example of sustainable economic development that directly benefits subsistence fishermen, personal use fishermen, sport fishermen, charter fishermen, commercial fishermen, seafood processors, as well as state and local governments such as Valdez, which receive raw fish tax dollars; and

WHEREAS, Alaska hatcheries accounted for 57% of the total common property commercial catch and 60% of the total ex-vessel value in the Prince William Sound region in 2017; and

WHEREAS, the Prince William Sound Aquaculture Corporation (PWSAC) headquartered in Cordova contributes significantly to the economy of Prince William Sound by providing 1,405 jobs, \$68 million in labor income, and \$192 million in total economic output in 2017; and

WHEREAS, the Valdez Fisheries Development Association, Inc. (VFDA) headquartered in Valdez contributes significantly to the economy of Prince William Sound by providing 824 jobs, \$21.5 million in labor income, and \$80.1 million in total economic output between 2008 to 2012; and

WHEREAS, Alaska's salmon hatchery program has proven to be significant and vital to Alaska's seafood and sportfish industries and the state of Alaska by creating employment and economic opportunities throughout the state and in particular in coastal communities such as Valdez ; and

WHEREAS, Alaska's salmon hatchery program is non-profit and self-funded through cost recovery and enhancement taxes on the resource and is a model partnership between private and public entities; and

WHEREAS, the State of Alaska has significantly invested in Alaska's salmon hatchery programs and associated research to provide for stable salmon harvests and to bolster the economies of coastal communities like Valdez, while maintaining a wild stock escapement priority; and



Resolution No. 18-33
Page 2

WHEREAS, Alaska salmon fisheries, including those of hatchery origin, continue to be certified as sustainable by two separate programs, Responsible Fisheries Management (RFM) and Marine Stewardship Council (MSC);

WHEREAS, salmon hatchery programs are permitted using a public process, employ strong scientific methodology and are built upon sound and sustainable fisheries policies intended to protect wild salmon populations.

NOW, THEREFORE, BE IT RESOLVED, BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, that

- Section 1. The City of Valdez affirms its support for Alaska's Salmon Hatchery Programs including PWSAC and VFDA.
- Section 2. The City of Valdez supports unbiased and scientific methods to assess the interaction of Alaska's salmon hatchery programs with natural stocks, such as the Alaska Hatchery/Wild Salmon Interaction Study which began in 2011 and is scheduled to conclude in 2023.
- Section 3 The City of Valdez calls on the Alaska Board of Fisheries to work with the hatchery community, the Alaska Dept. of Fish and Game and industry leaders to further its understanding of the importance of the Alaska salmon hatchery program to all Alaskans.
- Section 4 The City of Valdez supports the Alaska Dept. of Fish & Game's approval of VFDA's permitted increase of 20 million pink salmon eggs taken in 2018 at the Solomon Gulch Hatchery.

PASSED AND APPROVED BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, this 2nd day of October, 2018.

CITY OF VALDEZ, ALASKA

Jeremy O'Neil, Mayor

ATTEST:

Sheri L. Pierce, MMC, City Clerk



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Homer, Alaska, and I participate in the commercial and sport salmon fisheries of the Prince William Sound region. My family has been commercial fishing Alaskan waters since the 1930's, and Prince William Sound seine and gillnet fisheries since the 1960's. I started fishing with my father in Prince William Sound when I was five years old. My father started fishing with his father in Prince William Sound when he was 8 years old. I bought into the Prince William Sound gillnet fishery when I was 18, in 2008. In 2012 I bought into the Prince William Sound seine fishery. I have been fishing and growing my business there to this current date. During that time we have seen a growth in the wild stock runs. Some of the biggest wildstock runs to ever return to the sound alongside the hatchery runs. Salmon fishing in Prince William Sound is my livelihood. It makes up nearly all of my annual income. It provides for my wife and three kids. It allows me to upgrade my equipment and support local businesses throughout Homer 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.

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,

Colten Tutt
coltentutt@gmail.com
(907) 299-8798

Submitted By
Colten Wilkerson-Thiel
Submitted On
11/9/2021 3:15:21 PM
Affiliation



PC046
1 of 1

Phone
9074606910
Email
colten44@aol.com
Address
1100 Anvil Lane
Fairbanks, Alaska 99712

Hellow, please see below for my stance on the following proposals.

Proposal 6 - Oppose! Most fisherman do not have cell coverage in these areas to utilize an app or call-in number.

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 - Oppose!

Proposal 15 - Strongly Oppose!

Proposal 16 - Strongly Oppose!

Proposal 17 - Strongly Oppose!

Proposal 18 - Strongly Support!!

Proposal 20 - Oppose!

Proposal 21 - Support!

Proposal 22 - Support!

Sincerely,

A lifelong Alaskan

P.S. Stop trawling in our Alaskan waters!



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Petersburg, Alaska and I participate in the commercial and sport salmon fisheries of the Prince William Sound region as well as through processing. Commercial salmon fishing is the heart of my business and to my crew of four since 1980. Hatcheries have made this more dependable to my business and to the crew. It has allowed extending the short salmon season and in a business sense I would consider it a form of diversification.

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

Sincerely,

William Connor
crfbc@aol.com
(360) 951-9213



Oppose Proposals 49 - 55

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

Cook Inlet Seiners Association (CISA) urges the Alaska Board of Fisheries to oppose Proposals 49 - 55 and continue to allow ADF&G biologists and managers to oversee the State of Alaska PNP Hatchery Program.

CISA supports the current system of oversight by the qualified biologists and managers of the Alaska Department of Fish and Game. At the BOF October 2018 Work Session, ADF&G presented Special Publication No. 18-12 Salmon Hatcheries in Alaska, A Review of the Implementation of Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks. This document explains the precautionary methods used for management and demonstrates why Proposals 49 – 55 are unnecessary.

A Commercial Fisheries Entry Commission database search shows over 90 Prince William Sound commercial salmon permits with Homer addresses. These, combined with permit holders residing in other areas who keep their vessels in Homer, add up to a significant contribution to the Homer area .The current system of well managed PNP Hatchery Programs with comprehensive oversight from ADF&G is quite valuable to the community of Homer.

Please oppose Proposals 49 – 55 and allow the professional ADF&G biologists to continue to do their jobs.

Thank You

Morgan Jones

President, Cook Inlet Seiners Association



Cordova District Fishermen 2021 BOF Written Comments Prince William Sound Meeting

	Proposal	ADFG Position	Division	CDFU Position	Comments
	Commercial Finfish				
1	Open a directed longline skate fishery in PWS <i>Dia Kuzmin</i>	O	Groundfish /Shellfish Division	Support	Skates are a highly abundant and underutilized species that will provide economic opportunity for fishermen in PWS communities.
2	Landing Requirements for PWS <i>ADFG</i>	S	Groundfish /Shellfish Division	NC	
3	Prince William Sound Pacific Cod Management Plan <i>ADFG</i>	S	Groundfish Division	NC	
4	Sablefish harvest, possession, and landing requirements in PWS <i>ADFG</i>	S	Groundfish Division	NC	
5	Establish an optimum escapement goal for Copper River King Salmon <i>KRSA</i>	N	Gillnet Division	Strongly Oppose	<p>This proposal is in opposition to the recommendations that ADFG has made in its current escapement goal memo. CDFU supports the changes proposed by ADFG, and strongly opposes this proposal.</p> <p>ADFG is already managing stocks for biological goals and maximum sustained yield, so this muddies the water by using alternate terms like 'optimum'. It is an allocative goal, rather than biological, and the data from ADFG does not support a goal above 21,000 to 31,000 as run strength decreases as escapement approaches 40,000.</p>



Cordova District Fishermen 2021 BOF Written Comments Prince William Sound Meeting

					<p>Furthermore, revising an escapement goal is the role of ADF&G and the department's analysis of best available science.</p> <p>Additionally, we have concerns that adoption of this proposal may lead to a significant amount of unnecessary waste in the sockeye fishery, as restrictions on chinook fisheries will lead to closures in multiple fisheries, resulting in unharvested surplus.</p> <p>ADFG Staff Comments reference concern with setting an escapement goal that increases the probability of diminished returns. Ultimately, CDFU shares these concerns with ADFG, and urges the board to reject this proposal.</p>
6	Require in-season reporting for subsistence, sport fish, and personal use.	O	Gillnet Division	Support	<p>In-season fishery data has long been lacking in upriver fisheries, while downriver users are held to a higher standard. In season reporting can provide valuable information to ADFG about the state of a run, and can ensure more accuracy than the end of season reports.</p> <p>This proposal would provide ADFG with an additional in-season tool for accurate management and harvest numbers. When harvest numbers are expanded, there can be more variables in the data and the potential for harvest numbers to be inaccurate.</p> <p>Additionally, online reporting has become a new normal for the upriver fisheries and has increased the accuracy of reporting. This proposal would help to ensure the resource can be managed more effectively and prevent overharvesting a resource on years of weaker abundance by helping management adequately and accurately account for harvest in-season, rather than with post-season data.</p>



Cordova District Fishermen 2021 BOF Written Comments Prince William Sound Meeting

7	<p>Prohibit guiding in subsistence finfish fisheries</p> <p><i>Shawn Gilman</i></p>	N	Gillnet Division	Support	<p>The main driver of statehood was for the State of Alaska to take over its fisheries and manage them effectively. In 1992, the Board Fish and Game decided on implementing Non-Subsistence areas in the State of Alaska. In doing so, they protected waters in and around large population centers of the state of Alaska.</p> <p>For every cause there is an effect, the unforeseen effect of this adoption by the Board of Fish and Game in 1992 was putting extra pressure on the Copper River Basin in terms of “subsistence” fishing. The intent of having the Glennallen Subdistrict as a subsistence fishery was to maintain customary and traditional usage of Copper River Sockeye Salmon, whether it be by fishwheel or dipnet by land or boat.</p> <p>Unfortunately, the intent and the reality of subsistence fishing on the Copper River has become more alarming every year. Limited Entry was implemented to ensure there wasn’t an overharvest of the resource in commercial operations and managers could effectively and accurately manage year to year. The unforeseen commercialization of subsistence in the Glennallen Subdistrict has significant potential consequences, by having an unlimited user group commercially utilizing the fishery. A large number of the participants in this fishery come from Non-Subsistence areas and pay to have a guide take them out, hand them a dipnet, and drive them where the fish will be and ultimately land the fish.</p> <p>Guides are advertising across the state to take out new participants every year, most of whom are not from the Copper River Basin. The definition of subsistence was to allow “reasonable opportunity”, this has far exceeded reasonable opportunity and is nothing short of a sure thing now. In 2009 there were 469 permits issued and in 2019 there were 1354 permits</p>



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					<p>issued. Each of these permits has the potential to harvest up to 500 salmon if they were able to catch them. This is just the start of an unsustainable practice; commercialization of subsistence leads to a slippery slope of overharvesting a resource by the means of an unlimited number of participants and high harvest potential.</p> <p>It's also important to note that commercial fisheries were limited in 1974 to protect the sustainability of Alaska's salmon runs, as it was recognized that an unregulated commercial use of Alaska's fishery resources could have devastating impacts to salmon populations.</p> <p>The department staff comments reflect that dip netting from boats has been in practice since 1984, but fails to realize the increased efficiency of boats, electronics and fishing method/gear (trawling the river) since 1984. The commercial drift gillnet fleet has already taken measures of reduction and time and area due its own increased efficiency in the past 15 years. It is time for the Board of Fish to address this loophole that was incidentally created, and to limit the commercial operations in subsistence fisheries on the Copper River.</p>
8	Prohibit dipnetting near tributary mouths in the Upper Copper River District <i>Kirk Wilson</i>	O		NC	
9	Prohibit dipnetting from a boat in Glennallen Subdistrict <i>Copper Basin AC</i>	N		Support	The CDFU Gillnet Division supports this proposal and shares concerns about dipnets essentially being used as in-river trawls, with vessels making large sweeps up and down the river. This proposal seeks to address this issue.



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10	Prohibit dipnetting from a boat in Upper Copper Subdistrict <i>Ahtna Tene Nene'</i>	N		Support	The CDFU Gillnet Division opposes this proposal and shares concerns about dipnets essentially being used as in-river trawls, with vessels making large sweeps up and down the river. This proposal seeks to address this issue.
11	Prohibit dipnetting from a moving boat in a portion of the Chitina Subdistrict <i>Nicole Farnham</i>	O		NC	
12	Prohibit dipnetting from a boat when within 50 feet of a person dipnetting from shore. <i>Nicole Farnham</i>	O		NC	
13	Prohibit dipnetting from a boat when within 75 feet of an operating fish wheel in the Glennallen Subdistrict. <i>Faye Ewan</i>	N		NC	
14	Prohibit the use of gillnet mesh in dipnets <i>Kirk Wilson</i>	O		NC	
15	Prohibit the use of gillnet mesh in dipnets. <i>Copper Basin AC</i>	O		NC	
16	Prohibit the use of depth or fish finders on boats in the Upper Copper River District	O		NC	



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	Kirk Wilson, Copper Basin AC, Karen Linnell				
17	Establish specific permit and bag limits when dipnetting from a boat in the Glennallen Subdistrict. Faye Ewan	N		NC	
18	Extend the lower boundary of the Chitina Subdistrict downstream ½ mile. Chitina Dipnetters	N	Gillnet Division	Oppose	<p>Expanding the Chitina PU Dipnet Fishery into non-historical areas of their fishery, while simultaneously and continually reducing the time and area of the commercial fleets is nothing more than a reallocation of a resource.</p> <p>Expansion of the area in the CPUDF would just be moving the congestion of boats downstream to the new lower boundary. By lowering the boundary it would also allow harvest in Haley Creek and Canyon Creek where sockeye salmon school up and rest before swimming up through Wood Canyon -- especially during high flow events, and could lead to additional harvest above and beyond the user group's existing allocation -- and at the expense of</p>
19	Reduce the maximum harvest level in the Chitina Subdistrict Personal Use Fishery when the	N	Gillnet Division	Strongly Support	<p>CDFU strongly supports this proposal, and will be providing additional feedback on it during the meeting. Pairing this allocation reduction with early-season commercial fishery performance would provide a more equitable distribution of conservation burden between all user groups. Further, this regulatory change would allow flexibility for ADFG biologists to manage the commercial fishery for a lower overall in-river goal. This primarily helps keep the commercial fishery open consistently in the early season when prices are higher, and still allows the PU fishery to catch in excess of the 50,000 allocation if in-river numbers improve. Historically,</p>



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	<i>Cordova District Fishermen United - Gillnet Division</i>				<p>the in-river goal has been exceeded significantly, even in years of low abundance. Additionally, the “maximum harvest level” currently in regulation, has been exceeded as well, while commercial fishers have been restricted, losing valuable early-season time.</p> <p>Salmon in excess of the in-river goal would not be included in this maximum harvest level, or salmon taken after August 31. Essentially, if the lower in-river goal is exceeded in daily sonar passage, upriver users will still see increased opportunity, but it will also allow for additional opportunity for downriver users, particularly in years of lower abundance.</p>
20	Amend the annual limit for salmon in the Chitina Subdistrict.	N	Gillnet Division	Support	We support the reduction of the PU bag limit due to the Copper River sockeye run experiencing a depressed state as of late. The bag limits should also reflect what the river system can handle, not based on the Kenai River’s bag limit to make enforcement easier.
21	Amend the opening date of the Chitina Subdistrict personal use fishery from June 7 to June 1.	N	Gillnet Division	Oppose	<p>The current season dates correlate with the actual timing of the early season run. It is unnecessary to open the upriver fisheries before June 7, in order to ensure that escapement throughout the season is met, particularly for chinook, which typically run earliest on the Copper River.</p> <p>These season dates were initially implemented to ensure that early season stocks, some of which travel the farthest to spawning grounds, have adequate time to transit the river and ensures the sustainability of the salmon runs.</p>
22	C&T Determination	N	Gillnet Division	Support	
23	Reverse the positive customary and traditional subsistence use determination for rainbow and	N	Gillnet Division	Support	



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	steelhead trout in the Prince William Sound Area, or establish amounts reasonably necessary for the subsistence and bag and possession limits for rainbow and steelhead trout in the Prince William Sound Area.				
24	Add bag and possession limits for Dolly Varden in the Prince William Sound freshwater finfish subsistence fishery.	S	Gillnet Division	Neutral	
25	Establish allowable gear in the Prince William Sound freshwater finfish subsistence fishery.	S	Gillnet Division	Oppose	CDFU opposes this proposal as it may cause user group conflicts
26	Create a community subsistence salmon permit for Prince William Sound	N	Gillnet Division	Support	It is necessary to ensure that the Native Village of Chenega has a sufficient amount of salmon to feed their community year round, and this proposal will help NVC to achieve their subsistence needs.
27	Amend subsistence fishing season to remove linkage between subsistence salmon fishing opportunity and commercial salmon fishing period.	N	Gillnet Division	Oppose	<p>CDFU strongly opposes this proposal. Current regulations provide an orderly and easily managed fishery by</p> <p>This would bring an unforeseen amount of increase of users in the Prince William Sound and Copper River area. Allowing 7 days a week fishing could have an impact on wild salmon stocks in the area of Prince William Sound and Copper River by being open and largely unregulated for the entire summer, and enforcement within this fishery would be difficult with such a broad time and area.</p> <p>Additionally, allowing 7 days a week subsistence in the Prince William Sound area will highly cripple Prince William Sound Aquaculture to effectively meet their corporate escapement and</p>



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					<p>broodstock goals in the Coghill and Eshamy districts respectively. Recently, increased traffic within the Coghill and Eshamy districts have led to interference with cost recovery fishing.</p> <p>There already is significant opportunity to harvest subsistence fish with in Area E by coinciding with commercial openings and every Saturday from 6:00 am to 10:00pm.</p>
28	Amend household limits for subsistence-caught salmon.	N	Gillnet Division	Oppose	<p>CDFU opposes this proposal to increase bag limits for subsistence-caught salmon. Currently, the bag limits reflect the ability of area subsistence users to access additional means of protein. Upriver Subsistence users have one primary source of fish -- salmon, whereas downriver subsistence users have access to harvest the following: salmon, halibut, lingcod, rockfish, tanner crab, cod, shellfish, herring, and more. Salmon is centric to both communities, but downriver users have access to ocean fisheries that is not geographically available to upriver users without travel.</p> <p>Additionally, downriver users have access to other protein forms as well, through a variety of subsistence and sport hunts within the area.</p> <p>Though there is a disparity in the specific limits of salmon between the two fisheries, CDFU believes that downriver users have a significant amount of subsistence opportunity, and many CDFU members participate in many of these subsistence harvests for their own needs as well.</p>
29	Lawful Gear NVE	N	Gillnet, Seine Divisions	Oppose	<p>CDFU Gillnet and Seine Divisions are both opposed to this proposal, and share concerns about user group conflict within Prince William Sound fisheries, as it is difficult for seine gear and gillnet gear to operate concurrently within the same district regardless of whether those gear groups are commercial users or</p>



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					subsistence.
30	Extend single-hook, artificial fly regulations in the Gulkana River to include the area under the Richardson Highway Bridge	S	Gillnet Division	Neutral	No comment
31	Increase the possession limits for sockeye salmon in	N	Gillnet Division	Oppose	The Copper River and the Kenai River are two very different river systems with a significant run size differences between the two. While the proposer seeks to find parity between both runs, it is not reasonable when the runs differ so greatly.
32	Allow harvest of rainbow trout 20 inches or less in a portion of the Gulkana River.	O	Gillnet Division	Support	Predation on sockeye smolt has been identified by regional user groups at various regional meetings as a significant area of concern within the Copper River Basin, and CDFU supports this proposal as it would increase sport fish opportunity while simultaneously reducing pressure and predation on sockeye salmon stocks. r sport fishery
33	Allow harvest of rainbow trout 18 inches or less in the Gulkana River	O	Gillnet Division	Support	Predation on sockeye smolt has been identified by regional user groups at various regional meetings as a significant area of concern within the Copper River Basin, and CDFU supports this proposal as it would increase sport fish opportunity while simultaneously reducing pressure and predation on sockeye salmon stocks.
34		S	Gillnet Division	NC	
35		O	Gillnet Division	NC	
36	Increase the bag and possession limit of lake trout in Crosswind Lake	O	Gillnet Division	Support	Predation on sockeye smolt has been identified by regional user groups at various regional meetings as a significant area of concern within the Copper River Basin, and CDFU supports this proposal as it would increase sport fish opportunity while



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	Kirk Wilson				simultaneously reducing pressure and predation on sockeye salmon stocks.
37	Establish sport bag and possession limit for lake trout in the Prince William Sound area.	S	Gillnet Division	Neutral	
38	Establish restrictions in the Copper River Delta coho salmon sport fishery based on the number of days the commercial fishery is closed. <i>CDFU Gillnet Division</i>	N	Gillnet Division	Support	Adding this regulation would just ensure the accountability of a shared burden across all user groups to make adequate escapement for Copper River Delta Coho.
39	Extend the area closed to sport fishing in Ibeck Creek <i>Copper River/Prince William Sound AC</i>	N	Gillnet Division	Support	Extending the closed waters to sport fishing would just ensure that the spawning escapement in Ibeck Creek is uninterrupted by anglers. If this proposal passes, it would also split up anglers amongst other drainages on the Copper River Delta and take off some pressure on Ibeck Creek. Anywhere from 25-54% of the total Coho sport harvest on the Copper River Delta comes out of Ibeck Creek, protecting the spawning beds is prudent to maintain this highly viable fishery.
40	Close 18 Mile or Silver Creek to coho salmon fishing August 1 to November 1 <i>Copper River/Prince William Sound AC</i>	N	Gillnet Division	Support	There is a high risk of overfishing in this small tributary to Alaganik River. Additionally there is a significant amount of spawning habitat below the road system at Mile 18 creek, by closing this area it would ensure that the fish that spawn below the road are unmolested. This wouldn't take away much harvest potential, due to the fact 18 mile fish can still be caught in the Alaganik River before entering 18 mile creek.



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41	Repeal mandatory closed waters from the Copper River King Salmon Management Plan <i>CDFU Gillnet Division</i>	N	Gillnet Division	Support	The current regulation is an unnecessary regulatory burden, and ADFG Management has authority to restrict this by EO already. This proposal would not force the Department to open inside waters, but would allow the Department more flexibility for in-season management in years of abundance.
42	Amend the set gillnet group ex vessel value percentage trigger point in the Prince William Sound Management and Salmon Enhancement Allocation Plan <i>Darin Gilman</i>	N	Gillnet Division		No comment at this time. CDFU Gillnet Division will be submitting further comment as a record copy.
43	Repeal the definition of enhanced salmon stocks. Michael Bowen	N		Gillnet Division - Support Seine Division - Oppose	<p>The CDFU Gillnet Division supports including VFDA into the allocation plan. Over the past 10 years, the gillnet fleet is 7 percent behind in the Prince William Sound Management and Salmon Enhancement Allocation plan, and if VFDA were to be included the gillnet fleet would be much further behind than the initial 50/50 split that was agreed upon in the 2005 Salmon Enhancement Allocation Plan.</p> <p>CDFU Gillnet Division believes the allocation plan is not working and needs to be reworked to include VFDA to maintain parity between gear groups, as is the intent of the plan. VFDA fish compete with other enhanced fish in Area E, so it is only fair to include it in the overall Prince William Sound Management and Salmon Enhancement Allocation Plan.</p> <p>In contrast, the CDFU Seine Division opposes this proposal.</p>
44	Amend allocation corrective action criteria for set gillnet gear under the Prince William Sound	N	Gillnet Division		CDFU Gillnet Division will be submitting further comment as a record copy.



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	Management and Salmon Enhancement Allocation Plan.				
45	Increase minimum operation distance between set and drift gillnet gear in the Main Bay Subdistrict.	N	Gillnet Division	Oppose	<p>CDFU Gillnet division opposes this proposal. The intent of having a minimum distance of 50 fathoms between setnets inside the Main Bay Subdistrict was to ensure that both gear groups could fish inside the bay without favoring one gear group over the other. There was a compromise that was understood that when the board lowered the minimum distance from 100 fathom to 50 fathoms that this shrunk the area by as much as 50 percent of the Main Bay subdistrict for the drift fleet. It was agreed upon at the time the beach area of the bay was available for the drift fleet as well as the setnet fleet to clean up. Increasing the minimum distance from 25 fathoms to 30 fathoms between setnets and drift gillnets would dramatically increase clean up opportunities for the setnet fleet by taking away from the drift fleet. This is an allocation grab by one gear group over the other, meanwhile the setnet fleet has been ahead on their allocation for 12 out of the past 15 years.</p>
46	<p>Repeal limitations on use of deep gillnet gear.</p> <p><i>Ezekiel Brown</i></p>	N	Seine, Gillnet Divisions	<p>Seine Division - Oppose</p> <p>Gillnet Division - Oppose</p>	<p>CDFU Gillnet Division opposes the repeal of limitations of use of deep gillnet gear in area E fisheries. This would potentially reduce time and area for the drift fleet throughout the fishing year. Currently, ADFG has EO authority to open deep gear before the first Monday in July if it is necessary.</p> <p>Additionally, PWSAC would need to be much more conservative in ensuring they broodstock collection and cost recovery goals if the drift fleet utilizes deep gear as the default, due to the increased efficiency of the gear. It would also increase the cost of operation for the drift fleet with having to maintain multiple deep nets throughout the fishing year.</p>



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					CDFU Seine Division is also opposed to this proposal as it may impact escapement of salmon bound for seine districts. This proposal may also have unintended impacts to the implementation of the PWS allocation plan.
47	Amend Prince William Sound Management and Salmon Enhancement Allocation Plan to provide management guidance for reducing Coghill District harvest of salmon stocks bound for other districts. NASA	N	Gillnet Division	Gillnet Division - Oppose Seine Division - Support	<p>Coghill district is a traditional area for drift gillnet fisheries, and interception of stocks bound for other areas was acknowledged when the hatcheries were originally implemented. Further, the allocation plan is meant to account for year-to-year variability in harvest, and the value of these fisheries is averaged out through the allocation plan to incorporate these differences.</p> <p>CDFU Seine Division supports this proposal as it would minimize allocative impacts to seine fisheries, and increase opportunity for seine fishermen. Additionally, it would reduce concerns for escapement in the Northwest District, which has been a concern for the seine fleet in recent years.</p>
48	Amend Prince William Sound Management and Salmon Enhancement Allocation Plan to provide management guidance for reducing Eshamy District harvest of salmon stocks bound for other districts. NASA	N	Gillnet, Seine Divisions	Gillnet Division - Oppose Seine Division - Support	<p>Eshamy district is a traditional area for drift gillnet fisheries, and interception of stocks bound for other areas was acknowledged when the hatcheries were originally implemented. Further, the allocation plan is meant to account for year-to-year variability in harvest, and the value of these fisheries is averaged out through the allocation plan to incorporate these differences.</p> <p>CDFU Seine Division supports this proposal as it would minimize allocative impacts to seine fisheries, and increase opportunity for seine fishermen. Additionally, it would reduce concerns for escapement in the Northwest District and Eastern District, which has been a concern for the seine fleet in recent years.</p>



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49	Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan	O	Gillnet, Seine Divisions	Oppose	<p>CDFU opposes proposals 49-53. The Alaska Department of Fish and Game utilizes the public Regional Planning Team (RPT) process to review hatchery operations and goals annually during this collaborative process, which is set out in regulation. This team is composed of qualified fishery biologists at both the Department and regional aquaculture organizations and is collaborative and open to the public.</p> <p>These experts involved with the RPT have intimate knowledge of hatchery operations, fishery management, permitting, annual management plans, and the regulations that govern hatchery production, and it is unnecessary to change this process of scientific review.</p> <p>CDFU also would like to reference the comments of both VFDA and PWSAC on proposals 49-53 and emphasize the sentiments expressed within. CDFU continues to support Prince William Sound hatchery contributions to our region's fisheries for all user groups over the last 40+ years.</p> <p>Further, CDFU would like to call attention to ADFG's opposition to these proposals as well and we urge the board to reject them.</p>
50	Amend the Armin F. Koernig Salmon Hatchery Management Plan to reduce straying of hatchery-produced salmon. <i>Pioneer Fisheries</i>	O	Seine, Gillnet Divisions	Oppose	See above comments
51	Amend the Cannery Creek Salmon Hatchery Management Plan to reduce straying of hatchery-produced salmon.	O	Gillnet, Seine Divisions	Oppose	See above comments



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52	Amend the Solomon Gulch Salmon Hatchery Management Plan.	O	Gillnet, Seine Divisions	Oppose	See above comments
53	Amend the Wally Noerenberg (Esther Island) Hatchery Management Plan to reduce straying of hatchery-produced salmon.	O	Gillnet, Seine Divisions	Oppose	See above comments
54	Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan to specify hatchery chum salmon production.	N	Gillnet, Seine Divisions	Oppose	<p>CDFU opposes Proposal 54 and 55.</p> <p>Production at Prince William Sound hatcheries has remained relatively stable in recent years, yet returns of both hatchery and wild populations have been widely varied. In the last 10 years, however, wild salmon returns have been some of the largest on record. CDFU urges the board to withhold any action on hatchery production until Alaska Hatchery Research Project results are finalized and data is assessed. The economic impact of production reduction would have significant negative impacts on the region and state's economy and on all user groups within the Prince William Sound region.</p>
55	Amend private non-profit hatchery permits to decrease allowable hatchery production.	N		Oppose	See above comments
56	Create requirements and specifications for use of 250 fathoms of seine gear in Prince William Sound	N		<p>Neutral - Seine Division</p> <p>Oppose - Gillnet Division</p>	<p>CDFU Gillnet opposes this proposal. Just like in the Bristol Bay fishery, it would allow captains to purchase additional permits and have them be fished on their vessels which will further inflate prices of the permits and become a barrier to entry for young fishermen in the fishery, particularly those from rural areas.</p> <p>CDFU Seine Division is neutral on this proposal. During Seine</p>



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					<p>Division meetings with the fleet in October 2021, there was little consensus on whether this is the right approach to fleet reduction, or whether it would create further issues within the fleet and complicate management. This proposal needs further vetting during the PWS meeting with additional members of the public to fully ascertain whether the fleet is supportive of this as a whole.</p> <p>Additionally, concerns were brought forward by some members of the seine fleet, that this proposal would unfairly favor larger vessels over smaller vessels, which would be a further barrier to fishery access for historical fishery participants within the region.</p>
57	Create requirements and specifications for use of 250 fathoms of seine gear in Prince William Sound	N		Neutral	See comments on Proposal 56.
58	Amend the Armin F. Koerning Salmon Hatchery Management Plan to provide daily fishing periods.	N		Oppose	AFK Chum salmon were implemented to be a cost recovery fishery that has turned into a Terminal Harvest Fishery. There is not a concern for degradation of fish quality. Long hours of fishing puts unnecessary pressure on wild stock salmon bound for other districts in Prince William Sound. If this regulation were to change it would take away opportunity from the drift and setnet fleets as well.
59	Reduce waters closed to commercial salmon fishing.	O	Seine Division	Support	CDFU supports opening additional area and seeks to work with the Alaska Department of Fish and Game to find common ground on the terms and boundaries of this proposal.
60	Update closed waters defined in regulations by incorporating GPS locations to replace closed waters	S	Seine Division	Oppose	CDFU Seine Division currently opposes this proposal, but is open to discussion with the Department prior to and at the PWS Meeting. This proposal needs further analysis with new Department staff and members of the fleet to determine the



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	areas historically defined by physical markers.				<p>accuracy of the points included in the proposal. CDFU tentatively supports the intent of the proposal to codify historical markers, but the depth and breadth of this particular proposal make it difficult to ascertain</p> <p>Additionally, CDFU Seine Division would like to comment on the importance of keeping visual markers in place for historical fishery boundaries. These are beneficial to commercial fishermen operating vessels during an active fishery and help provide a visual aid to enforcement. CDFU has partnered with ADFG to purchase new signs for Prince William Sound markers, and would like to see the completion of the marker project by ADFG staff in the coming years.</p>
61	Establish a commercial fishery for sea cucumbers in Registration Area E.	N	Groundfish /Shellfish Division	Support	
62	Establish a commercial fishery for sea cucumbers in Registration Area E.	N	Groundfish /Shellfish Division	Support	
63	Amend Registration Area E king crab fishing season, guideline harvest level (GHL), and lawful gear regulations.	O	Groundfish /Shellfish Division	Support	
64	Establish a fishing season for golden king crab in Registration Area E	O	Groundfish /Shellfish Division	Support	
65	Establish a department-issued permit for the commercial golden king crab fishery in Registration Area E.	O	Groundfish /Shellfish Division	Support	



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66	Amend guideline harvest range for golden king crab in Registration Area E	S	Groundfish /Shellfish Division	Support	<p>This proposal will establish a baseline regulatory framework and pathway to open a fishery in the future. If this proposal does not pass, the king crab fishery in Prince William Sound will be stuck in regulatory limbo until the next Board cycle.</p> <p>This proposal would allow for lower levels of harvest in a Prince William Sound king crab fishery, and would allow the Department more flexibility in management, as a lower harvest level could be set based on actual abundance. This proposal does not require the Department to open a king crab fishery, but at least opens the door for one in the future pending changes in biomass estimates.</p>
67	Establish a golden king crab pot limit in Registration Area E.	N	Groundfish /Shellfish Division	Support	
68	Adopt amounts reasonably necessary for subsistence for Tanner crab in the Prince William Sound Area, outside the Valdez Nonsubsistence Area.	N	Groundfish /Shellfish Division	Support Option E	CDFU Groundfish/Shellfish Division Supports Option E: Take no action.
69	Modify criteria for opening commercial Tanner crab fishery in Prince William Sound.	O	Groundfish /Shellfish Division	Support	The trawl survey is a flawed method for assessing tanner crab abundance in Prince William Sound.
70	Modify criteria for opening commercial Tanner crab fishery in Prince William Sound.	O	Groundfish /Shellfish Division	Support	



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71	Adopt a new Tanner crab harvest strategy for Prince William Sound	O	Groundfish /Shellfish Division	Support	
72	Allow the department to issue a permit for Tanner crab fisheries closed more than one year.	O	Groundfish /Shellfish Division	Support	
73	Establish closed waters for commercial Tanner crab fishing in the Prince William Sound Area, Registration Area E.	S	Groundfish /Shellfish Division	Oppose	
74	Redefine and rename commercial Tanner crab districts in the Prince William sound Area, and add one additional district.	S	Groundfish /Shellfish Division	Support	If adopted, this proposal will allow ADF&G more flexibility in managing the fishery in times of lower abundance.
75	Adopt a new Prince William Sound Area (PWS; Area E) Tanner crab harvest strategy to align with new proposed districts.	S	Groundfish /Shellfish Division	Strongly Oppose	CDFU strongly opposes this proposal. We believe this harvest strategy will effectively close this fishery indefinitely. Please refer to Appendix A (attached) for in depth comments on this proposal.
76	Repeal Commissioner's permits for Tanner crab in the Eastern and Western Districts of Prince William sound (PWS).	S	Groundfish /Shellfish Division		
77	Amend the Tanner crab registration deadline.	S	Groundfish /Shellfish Division	Support	
78	Remove district references and include all districts in the Prince William Sound area (PWS; Area E) and include a weather-delay provision for the opening date of the fishery.	S	Groundfish /Shellfish Division	Support	



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79	Designate Registration Area E an exclusive registration area for Tanner Crab.	N	Groundfish /Shellfish Division	Support	
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Appendix A: CDFU Groundfish/Shellfish Division Comments on Proposal 75: RC 4

Proposal 75, RC4: **OPPOSE**

CDFU Groundfish/Shellfish Division strongly opposes this proposal. We believe this harvest strategy will effectively close this fishery indefinitely. We take issue with this proposal on the following points:

1. A reliance on trawl survey data has been shown to be inaccurate in developing abundance estimates.
2. The use of Th, 5.3" crab, to set biomass estimates while allowing the harvest of TI ,5" crab,.
3. The drastic 50% increase in biomass requirements to execute a fishery

Surveys: From 1977-1991 Pot surveys, in conjunction with commercial catch CPUE, were the primary management tools used by the Department. In 1991 the Department did their first trawl survey in conjunction with the pot survey. After only one year of the surveys overlapping, the Department terminated the decades-long pot survey program and switched to a trawl survey program only. This resulted in the Department correlating decades of pot survey data into a new trawl survey program with only one year of overlap. It is the position of CDFU that this was not an adequate time frame of overlap for changing survey methods.

Further, it is our position that the Department continues to conduct this biannual trawl survey in too small a portion of PWS. This data is used to produce a biomass estimate for all 14,000 square miles of PWS. For example in the 2018 trawl survey they conducted a total of 44 one mile tows catching a total of 85 crab of historical legal size. This harvest of 85 crab led to an abundance estimate of 75,000 historical legal crab. CDFU does not believe that an accurate population model can be created from such a small sample and encourages the Department to reconsider this approach.

Additionally, CDFU does not support trawling as an effective method to target tanner crab. We believe this method has the potential to create statistically significant inaccuracies within ADF&G's biomass estimate data sets. From the observations of the commercial harvesters represented by CDFU, tanner crab in Prince William Sound are mostly located on edges and in holes that are very difficult and dangerous to access with a trawl. Recent pot harvest data from the same area as the trawl survey shows CPUE above 20 legal males per pot. This draws stark contrast to the trawl survey which only achieved a legal male CPUE of 1.98 crab/nmi for a total of 85 legal crab in the entire survey (2018).

CDFU strongly suggests that the Department discontinue trawl surveys. Phasing them out for more reliable data collection methods such as revamping the historical pot survey and using



CPUE from commercial harvest to gage biomass strength. We believe the commercial fleet's landings and local ecological knowledge continues to be an incredibly valuable survey tool to support the Department's data. The recent success of the commissioners permit fishery (2018-2021) is a prime example of this .

Th vs TI

- Th = Tanner historical legal size, >5.3 inches
- TI = Present legal tanner size, >5 inches

There is evidence of male tanner crab achieving terminal molt before reaching 5.3" The Department presented this evidence at the 2017 BOF. Further evidence has been collected since by the department as well as observed by fishermen throughout the commissioner's permit fishery. For example, in FMR #21-34, while referring to the 2019 commissioner's permit fishery, the Department states,

"Biological information was collected from an additional 6,280 Tanner crab during onboard observer trips: 5,891 males and 389 females. Of the males, 69% were sublegal, and 81% of those sublegal males were old-shell (76%) or very old-shell (5%) condition (Table 7). The crab with old and very old shells were probably in terminally molted condition."

Furthermore, ADF&G data suggests tanner crab are no longer growing to the size they once were. Throughout the 1980s ADFG recorded the mean weight of tanner crab harvest in the PWS fishery as 2.1/lbs. In 2021 ADF&G states:

"Tanner crab average weight from individual landings in 2021 ranged from 1.43 to 2.00 pounds, with an average from all trips sampled of 1.70 pounds, corroborated by fish ticket data, and similar to the average weight of 1.69 pounds in 2020" . (FMR #21-34)

Additionally,

"Size at 50% maturity for male Tanner crab in the Bristol Bay area in recent years decreased more than 20 mm CW from those in the early 1990s (Figure 3); the decrease over time was statistically significant." (Overview of Proposed Harvest Strategy and Minimum Size Limits for Bering Sea District Tanner Crab, 2011)

This raises many questions that the department has yet to answer:

- **If contemporary data shows that many mature male tanner crab never reach Th 5.3" why is this measurement being used to estimate biomass?**
- **Why then doesn't the department survey the biomass of legal crab (5") and set harvest levels off of that?**
- **How could a fishery be consistently executed where crab are harvested at a smaller size then the size you survey for?**



**Cordova District Fishermen
2021 BOF Written Comments
Prince William Sound Meeting**



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If this proposed fishery is opened for multiple years in a row every year the proportion of Th crab in the population would decline. Every year the fishery is open Th(5.3") crab would be harvested along with TI(5") crab. 5" crab would be harvested before they ever become 5.3" and are included in the biomass estimate. This would result in a perceived decline in population under this biomass estimate even if enough recruits were entering the 5" population to account for yearly harvest.

Back testing the Th-TI formula

The current management plan says that if biomass estimates of Th (5.3") crab exceed 200,000 but are less than 300,000 crab then the commercial harvest of TI (legal 5" crab) is 15%. This is the most conservative level the fishery can open at.

If we assume that the commissioner permit fishery which occurred only in the western district has been managed in a sustainable way with this conservative harvest level of 15% of Th we can work backwards using ADFG's proposed management model to find the estimated Th biomass level in just the western district based on harvest of TI.

The 2019 commissioners permit harvested 74,407 TI crab. Using the 15% of Th exploitation rate this would result in an estimated Th biomass of 496,046 in just the western district. **Adfg's trawl survey for 2018 produced a biomass assessment for all of area E of 75,000Th.**

The 2020 commissioners permit fishery harvest of 64,557 TI crab Using the 15% of Th exploitation rate this would result in an estimated Th biomass of 430,513 in just the western district. **Adfg's trawl survey for 2019 produced a biomass assessment for all of area E of 63,000Th**

This shows either a complete failure of the trawl survey to adequately assess crab populations or a gigantic miscalculation by adfg of the number of TI vs Th.

What justification does the department have to increase the biomass requirements to execute a fishery from 200,000 over the entire sound to 308,800 in 3/5s of the sound? The previous harvest strategy for prince william sound stated *"THE DEPARTMENT SHALL ESTIMATE THE ABUNDANCE OF MALE TANNER CRAB IN THE PRINCE WILLIAM SOUND AREA, AND SHALL ESTABLISH A GUIDELINE HARVEST LEVEL FOR LEGAL MALE TANNER CRAB IF THE CURRENT ESTIMATED ABUNDANCE OF TH IS ABOVE THE MINIMUM STOCK THRESHOLD FOR OPENING A FISHERY.*

(b) THE COMMERCIAL FISHERY MAY OPEN ONLY IF THE CURRENT ESTIMATED ABUNDANCE OF TH IS GREATER THAN OR EQUAL TO 200,000 CRAB"

The proposed harvest strategy does away with the soundwide abundance estimate and instead creates five independently managed districts three of which have their own abundance estimate requirements in order to prosecute a fishery. These three districts, the Northeastern, Central,



and Southwestern, have minimum biomass estimate requirements of T_h for a fishery of 93,300, 105,000, 110,500 respectively for a total of 308,800.

What justification is there to manage PWS tanner crab population in separate districts and populations? Prince William sound tanner crab have always been considered a single population and tagging studies have backed up what fishermen have always known that they follow migration patterns throughout the sound. As crab populations move between districts biomass estimates for each district will vary drastically. Opening the entire sound at once will allow fishermen to naturally target areas with high crab abundance with much more accuracy than this harvest strategy would achieve.

In conclusion, we do not believe this is a workable strategy that will result in a sustainable fishery. We wonder why the department seems to be so intent on creating such a complex strategy and is not simply using language that has been proven to work well elsewhere in the state. For example, the southeast Tanner crab fishery. Although southeast is a much larger area the harvest strategy does not split its population estimates up into multiple districts and simply uses an area wide population estimate to set harvest levels. Most importantly there is not a single crab fishery that is being consistently persecuted that uses a larger size crab to estimate population than can be harvested.

Submitted By
Curtis John Herschleb
Submitted On
11/15/2021 9:36:50 PM
Affiliation



PC050
1 of 1

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Address
Box 1622 301 Railroad Row
Cordova, Alaska 99574

Proposal 5 : Oppose.

Proposal 7 : Support

I strongly support this proposal for the unintended consequences that would inevitably flow from the commercialization of subsistence.

Proposal 10 : Support

Proposal 18 : Oppose

Proposal 27 : Oppose

Proposal 43 : Support

Submitted By
Dale Anderson
Submitted On
11/7/2021 2:51:14 PM
Affiliation
Substance user



PC051
1 of 1

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HC 60 Box 282B
Copper Center, Alaska 99573

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



PC052
1 of 1

Phone
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1565 Holy Cross Drive
Fairbanks, Alaska 99709-____

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
Affiliation



PC053
1 of 1

Phone
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danb611@yahoo.com
Address
821 Briny Circle
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 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. 8th 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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(907) 399-3269

Submitted By
Danny Carpenter
Submitted On
11/15/2021 10:21:23 PM
Affiliation



PC055
1 of 2

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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.



PC055
2 of 2

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.





November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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,

David Blake
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(425) 238-7102



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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.

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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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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,

David Blount
dkblount@hotmail.com
(575) 317-1723

Submitted By
David Branshaw
Submitted On
11/15/2021 10:46:08 PM
Affiliation



PC059
1 of 1

Phone
9072537694
Email
davidbranshaw@ctcak.net
Address
Po box 2241
Cordova , Alaska 99574

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
David Fleming
Submitted On
11/15/2021 4:00:22 PM
Affiliation
Setnetter



PC060
1 of 7

Phone
9072024503
Email
davidfleming13@hotmail.com
Address
5635 e 43rd
APT C
Anchorage, Alaska 99504

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 Eshamy 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---

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



PC060
3 of 7

--OPPOSE--

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--



PC060
4 of 7

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

Propsal 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. 8th 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
(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. 8th 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.

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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
(907) 529-1123



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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.

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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
(206) 286-5664

Phone 864-275-3738
Email Debbie24@gmail.com
Address 1260 range view road
North Pole, Alaska 99705

☒ ☐ ☐ ☐ **OPPOSE** ☐ ☐ ☒ ☐

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!



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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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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,

Dennis Deaver
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



PC068
1 of 1

Phone
9072535364
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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

Alaska Dept. of Fish and Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
Submitted via Email: 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

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. 8th 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 3rd 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
(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 8th 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. 8th 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. 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.

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,

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

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



PC074
1 of 1

Phone
8014507783
Email
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



PC075
1 of 1

Phone
907-429-8089
Email
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 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



PC076
1 of 1

Phone
9079470730
Email
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.

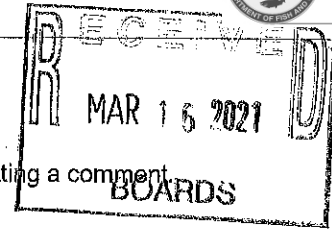


Alaska Department of Fish and Game

PC077
1 of 1[ADF&G Home](#) » [Regulations](#) » [Process](#)

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* 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 * *derelee01@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 *

<i>Proposal for Moose Creek, Copper River Basin</i>	
Format	<input type="text"/>
<i>Moose 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.</i>	
body p	Words: 0 (Limit: 5000)

[Submit Comment](#)

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



PC078
1 of 2

Phone
6083864119
Email
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. 8th 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.

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,

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. 8th 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.

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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. 8th 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

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



PC084
2 of 3

#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 placed at a distance from a stream but on the actual extent salmon tend to back out of the stream. I do not believe the department will 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 and the 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. 8th 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 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.

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,

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](#)

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
WalnutBurger.com // [Twitter](https://twitter.com) // [Instagram](https://www.instagram.com) // [Facebook](https://www.facebook.com)
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November 14, 2021

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

Dear Members of the Board of Fisheries,

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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,

Fred Newirth
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(997) 482-0658

Submitted By
Galina GLASIONOV
Submitted On
11/14/2021 11:21:41 AM
Affiliation



PC088
1 of 1

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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 totally 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
Affiliation



PC089
1 of 1

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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

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Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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.

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,

Gilbert Sheridan
Gil.Sheridan@obiseafoods.com
(907) 362-1576

Submitted By
Harlan Miller
Submitted On
11/9/2021 8:42:37 PM
Affiliation



PC092
1 of 2

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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.

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 fowling 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 take and an additional burden on the user to obtain multiple permits and additional reporting.



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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



PC093
1 of 2

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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.



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Proposal 21: I **oppose** increasing the personal use season when the commercial fleet has seen unprecedented decline 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. 8th 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.

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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,

Hope Finley
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. 8th 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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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
Ivan Stonorov
Submitted On
11/10/2021 9:17:44 AM
Affiliation



PC097
1 of 1

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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
Submitted On
11/14/2021 12:19:33 PM
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PC099
1 of 1

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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



PC100
1 of 1

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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



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Peterson Bay & Canoe Pass, Alaska, and I participate in the commercial, subsistence, sport, and public use salmon fisheries of the Prince William Sound Region. I am a commercial salmon permit holder for this region and chose to invest in this region because of the enhanced runs provided by hatcheries. Salmon are the main reason we are in the PWS area. Our business relies completely on the salmon runs of this region, and without the enhancement of hatchery runs we wouldn't have chosen to invest and work in PWS. Salmon are how we make our livelihood and feed ourselves and community. Without the hatcheries of the region we would simply not be here.

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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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.

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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,

Jacob Privat
jnprivat@gmail.com
(337) 412-8785

Submitted By
James Glenn Pulkrabek
Submitted On
11/8/2021 8:54:18 AM
Affiliation

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PO Box 1625
Palmer, Alaska 99645



PC102
1 of 4

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.

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fisherman and their passengers.



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In discussing this proposal 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. "

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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.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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, Alaska and I participate in the sport salmon fisheries of the Prince William Sound region. I'm a long time resident of over 50 years. Some of my family members commercial fish in PWS and some of them work at VFDA. The hatchery in Valdez and others around the state are very important to our economy.

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.



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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.

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

Sincerely,

Janet Blood
janet.l.blood@gmail.com
(907) 835-2718



November 14, 2021

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

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I'm a Logistics Coordinator for OBI Seafoods. I move supplies to and fish from our plants in Alaska. From the early planning for the first Copper River opener to the last pink salmon going into the can each year, my life is run by the ebb and flow of fish through our Cordova plant. I help move millions of pounds of fish out of Alaska by air, steamship, truck and barge. My role is a vital part of Alaska's economy, and it's largely thanks to healthy, sustainable hatchery production. For over 37 years, the PWS and other Alaska fisheries have provided my livelihood. Much of who I am and what I have is because of Alaska salmon.

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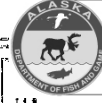
Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Jeanne Benson
jeanne.benson@obiseafoods.com
(206) 769-4901



Alaska Department of Fish and Game

PC105
1 of 1[ADF&G Home](#) » [Regulations](#) » [Process](#)

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* Indicates a required field

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

Name * **JEANNE SUNDER** Affiliation

Contact Phone * **907 822-3088** Email * **JEANRENEHRT@gmail.com**

Address Line 1 * **MILE 101.5 OLD RICHARDSON HWY.**

Address Line 2 **P.O. BOX 379 COPPER CENTER AK. 99573**

City * **COPPER CENTER**

State * **AK** - Zip * **99573**

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

Yes ☐ No ☐

Comment *

Format

I AM WRITING IN CONCENT TO SUPPORT THE BONNIE MCLEOD PROPOSAL FOR REGULATIONS ON "GRAYLING POPULATIONS IN MOOSE CREEK". THE GRAYLING POPULATION HAS BEEN DECLINING, SOON TO BE GONE. I WHOLY AGREE WITH HER PETITION TO REQUEST REGULATING GRAYLING BAG LIMITS ON MOOSE CREEK. AS A LOCAL SPORT FISHER PERSON, I HOPE NOT TO SEE THE GRAYLING POPULATION IN MOOSE CREEK DISSAPPEAR.

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!



November 14, 2021

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Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

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I live in Cordova, Alaska, and I participate in the commercial, subsistence, and sport salmon fisheries of the Prince William Sound region. I arrived in Cordova, Alaska in 1981 when this community was actively promoting and building a new hatchery in southwest PWS which is now called AFK. Since then I have participated as a commercial fishermen and limited entry permit holder in drift and seine fisheries. My children are all involved in the commercial fisheries and plan on making their livelihoods in these fisheries. I have served as chairman on the Copper River & Prince William Sound Marketing Association which promotes its producers and the value of these fisheries which contribute raw fish taxes to the State of Alaska and the communities of PWS. I also was a founding member and President of Prime Select Seafoods Inc. which operated a shore based processor in Cordova, Alaska for over 20 years adding value to the Copper River and PWS salmon resource. My livelihood and family have all been dependent on these resources and hatchery contributions to the resource. I have been commercially fishing for my livelihood for over 38 years. I am a limited entry permit holder in both Drift net and seine fishing in the Copper River and PWS. My three children are all working in the commercial fisheries and plan to purchase limited entry permits here.

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

Sincerely,

Jeff Bailey
jjefffish@gmail.com
(907) 441-6775

Submitted By
Jeff Moore
Submitted On
11/15/2021 10:14:43 PM
Affiliation



PC107
1 of 1

I would like to object to the proposal number nine from the Copper River advisory committee to ban dip netting from a boat above the bridge on the Copper River. This would eliminate subsistence fishing for many of us that have done this for many years. This is a small fraction of the fish that are harvested on this river that has met its escapement goals for many years. This would also eliminate a healthy source of food for many of our families. Thank you for your consideration



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I participate in the salmon fisheries of the Prince William Sound Region through processing. As a sales manager for OBI Seafoods, I am very involved with the seafood dependent economies of Seward and Cordova. The salmon fishery in Prince William Sound represents a significant amount of OBI's yearly production in the region and is extremely valuable to OBI, our fishermen and the communities we operate in.

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

Sincerely,

Jeff Otness
Jeff.Otness@OBISeafoods.com
(206) 601-9594

Submitted By
Jennie Tschappat
Submitted On
11/14/2021 8:29:19 PM
Affiliation



PC109
1 of 2

Phone
9072236461
Email
jtschappat@gmail.com
Address
PO Box 706
Glennallen, Alaska 99588

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.

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Proposal 22 - Support!

Submitted By
Jennifer G. Patronas
Submitted On
11/7/2021 10:19:09 AM
Affiliation



PC110
1 of 1

Phone
9072308339
Email
jennifer.patronas@gmail.com
Address
19638 DELPHIN CIR
EAGLE RIVER, Alaska 99577

I strongly oppose proposals 6-20. My family of 5 uses the Copper River to fish for salmon that we use all year long. Banning Copper River from dipnetting will greatly affect my family's ability to get our annual limit of salmon which we use daily during the winter months.

Submitted By
Jenny Moser
Submitted On
11/14/2021 9:00:16 PM
Affiliation



PC111
1 of 2

Phone
9072901498
Email
m2cyclone@gmail.com
Address
HC60 292D
Mile 14 Edgerton hwy
Copper Center, Alaska 99573

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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, (most river deaths have come from dippnetters falling into the river, not dipping from a boat)

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 fowling 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. “



PC111
2 of 2

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. 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!

Submitted By
Jenny Nakao
Submitted On
11/15/2021 10:44:35 PM
Affiliation



PC112
1 of 3

OUTLAW DIVE BOMBING of COMMERCIAL FISHERMEN by ALASKA WILDLIFE TROOPERS

Please establish legal guidelines for Alaska Wildlife Trooper pilots operating small aircraft to monitor commercial fishermen. Set a minimum distance a Wildlife Trooper is allowed to fly their plane at a commercial fishing vessel. Establish a maximum number of passes allowed on a single vessel at said distance. Require Wildlife Trooper Pilots to video record their flight path (not just a flat GPS track line) to help monitor the depth at which they are diving at commercial fishermen.

This dive bomb tactic is being used by pilots on the Copper River / Prince William Sound to monitor commercial fishermen with or without any obvious crime being committed. Such behavior can actually be the causation of fishing violations such as drifting too far or fishing past time by creating confusion or accidents. Worse than a citation, these harassing dive bombs may result in someone getting injured. Veterans, fishermen with children on board and people with heart conditions may be especially vulnerable. Commercial fishing inherently has enough dangers and stresses without the added trauma of being repeatedly dive bombed by a plane.

Furthermore, if Alaska Wildlife Troopers are *not* dive bombing sport fishermen, subsistence fishermen or a personal use harvester then this is a biased tactic reserved for commercial fishermen. The responsibilities of a healthy fishery lies on all participants of the fishery and enforcement of regulations should apply to all participants. So, if you cringe at the idea of a family dipnetting on the banks of the Chitina getting repeatedly dive bombed by a Wildlife Trooper then please act to protect the commercial fishermen, women and families being dive bombed on their commercial fishing vessels.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 and sport salmon fisheries of the Prince William Sound region. My life and income are centered around commercial fishing in PWS.

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,

Jenny Nakao
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(907) 362-0062

Submitted By
jerry foster
Submitted On
11/2/2021 12:33:14 PM
Affiliation



PC113
1 of 1

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Sterling, Alaska 99672

I went halibut fishing out of Homer this summer on a "charter-free" Wednesday and there were charter boats (binoculars) anchored in the first two spots I usually stop, so I moved on until we were clear of any other fishers.

As I reflect on the new "fishing quoto" program from my point of view it seems like a clever reallocation of halibut from sport to charter operators who are clearly commercial fishers. Sport fishers are not a cohesive political lobbying group and I suspect their views were not represented in whatever process was used.

When I fish halibut in the Juneau area I've seen small structures "plugged" with charters - given the more limited number of fish, this is a problem.

I wanted to voice my displeasure with this program and although the feds manage the halibut fisheries, Alaska also plays an important role.

Submitted By
Jesse Jones
Submitted On
11/9/2021 7:41:35 AM
Affiliation



PC114
1 of 1

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2171 N Verde Dr
Palmer, Alaska 99645

Hello,

I have been participating in the Personal Use dipnet fishery on the Copper River for at least a dozen years now. The salmon I catch on the Copper provides 25% of the meat consumed by my family each year, and provides for my elderly in-laws as well. While I have enjoyed both dipnetting from the bank as well as from a chartered boat, I can affirm that my success rate and safety is significantly increased when fishing from a boat.

By enacting the proposed restrictions on Personal Use and Subsistence fisherman to force them to shore-based dipnetting you will see significant negative effects on the fishery, the charters and their staff, as well as the residents who have come to depend on Copper River salmon as a key part of their sustenance throughout the year.

1) Limited "safe" places to dipnet from the bank within the boundaries of the Personal Use dipnet fishery creates artificial limits on the number of people allowed to fish. With a fixed number of spots available and fluctuations in water levels further restricting availability, many people are left without an opportunity to participate in the fishery at all. As it stands today, many people find themselves without a spot to dipnet. Introducing restrictions on dipnetting from a boat will increase the pressure on the limited spaces available. Without also increasing the area in which we are allowed to dipnet, you will remove a valuable food source from a lot of families

2) Many of the places where people are able to dipnet from the bank are on steep cliffs which require them to "tie off". This significantly increase the danger posed to the fishermen, in addition to the inherent dangers of fishing in such a large, fast, cold river. Providing food to my family shouldn't require me to put my life in danger for prolonged stretches of time. If you haven't witnessed fishermen dangling from a cliff, tied to a tree above, just to catch a handful of fish, I would encourage you to visit the Chitna Dipnet Fishery for yourself this summer. For more fun, see a couple stranded on a rock with no escape for 8 hours until a boat comes back to pick them up again.

3) Fishing from the boat provides economic stimulus to the local community, and the region, by providing employment and meaningful income to our residents. By eliminating dipnetting from the boat you are eliminating jobs in an environment where the economy has plenty of other challenges on its own. This proposed rule would also disproportionately affect some charter companies while ensuring the success of others.

As you can see, the proposed changes to the Chitna Dipnet Fishery will have many negative impacts on the residents who depend on it. For this reason I encourage you to vote no and keep our fishery the way it is. Thank you.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial fisherman and live in Homer. Our family has fished the Prince William Sound for 50 years, starting before hatcheries when it was difficult to make a good living. One of the beautiful benefits of hatchery production is that it generates adequate income for many crew members to attend college or trade schools. Over the years, our crew members have studied to become doctors, nurses, engineers, teachers, foresters, biologists and business owners. This is very beneficial to the State of Alaska.

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.

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.

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,

Jessie Nelson
nukapointfish@gmail.com
(907) 235-8778

Submitted By
Jim Cox
Submitted On
11/15/2021 7:52:38 PM
Affiliation



PC116
1 of 1

I voice a strong objection to proposal 9, specifically to eliminating the use of boats in the Glennallen sub district. For parties under personal or household subsistence permitting.

My family relies on the ability to sustainably harvest salmon under a subsistence permit on the Copper River. This proposal would severely reduce our fishing opportunities and limit the number of fish we count on.

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. This information can be found in a harvest study published by the department of Fish and Game, looking at the fish harvest counts during a 10 year span, from 2009 - 2019. Subsistence was 1/2 of the personal use harvest counts and significantly lower than commercial. It would be more beneficial for a reduction in all fish harvest counts allowed for all parties, rather than close off boat access. This restriction would only single out those who are fishing under subsistence permitting. We are fortunate to live in a state with subsistence opportunities, families depend on and I believe they should be protected.

Thank you for your time,

Jim Cox



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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, Alaska, and as the City Manager in Whittier, we collaborate closely with Whittier Seafood Processing, charter operators, commercial fishing operators and every aspect of fish life here on Prince William Sound. As the manager, I work closely with the Whittier Chamber of Commerce, commercial and private fishing vessels and clearly see the alignment and dependence on hatchery fish. The economic return is remarkable and the dollars from the industry roll over several times within our community and region. Whittier at the moment depends on tourism and FISH. Whittier Seafood is a key economic engine here.

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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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,

Jim Hunt
citymanager@whittieralaska.gov
(907) 202-2442

Submitted By
Jim Vohden
Submitted On
11/15/2021 11:07:54 PM
Affiliation



PC118
1 of 2

i have dipnetted in the Copper River for more than thirty years. From shore, from a boat, using a charter, doing it all ourselves; I have been fortunate to utilize all these methods to secure fish for our family over the years. I have passed this on to my children. It is a very important means for us to gather fresh, wholesome salmon. A tradition which cannot be replaced. I whole heartedly believe that the needs of the personal use fishery should supercede that of the commercial fishery.

I fully support the comments below as submitted by the Chitina Dipnetters Association and hope you will consider them carefully in your deliberations. Thank you.

Chitina Dipnetters Association

Public Comments Concerning Submitted Proposals To The December 2021 PWS/Upper Copper and Upper Susitna Finfish BOF Meeting

The Chitina Dipnetters Association recommends the following support or opposition to these proposals put before the Alaska Board of Fish at the December, 2021, meeting in Cordova. The Proposal Book for this meeting with the full proposal texts may be found at the Board of Fish website (<http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2021-2022/proposals/pws.pdf>)

Prop. 5 - support

Prop. 6 - oppose

Prop. 7 - oppose

Prop. 8 - oppose

Prop. 9, 10 & 11 - oppose

Establish an Optimum Escapement Goal (OEG) for Copper River chinook salmon, increasing the escapement goal to 24,000-40,000.

Require in-season reporting of harvest for the upper Copper subsistence, sport and personal use fisheries.

This would require that dipnetters report daily harvest within 3 days of catch rather than end-of- season harvest reporting. This is a recurring proposal to the BOF. It has been rejected by the BOF each time mainly because F&G says in-season reporting is not needed to manage these upriver fisheries. Management of these fisheries and the in-river salmon goal is dictated by actual daily sonar counts at the Miles Lake sonar.

Prohibit guiding in subsistence finfish fisheries.

Many people rely on guided salmon dipnet harvest to supplement their annual family food supply.

Prohibit dipnetting within 500yds below and 100 yds above any stream entering the Upper Copper River.

This would eliminate dipnetting near the mouths of O'Brien Creek, Haley Creek, the Chitina River and, if I read it right, any small creek entering the Copper, further limiting harvest opportunity. Dipnetting is already limited, by regulation, to the main stream of the Copper River and prohibited in any stream entering the Copper.

Prohibit dipnetting from a boat in the Upper Copper River District.

Public access along the Copper River is very limited for shore based dipnetting, especially in the Glennallen sub-district of the Upper Copper River District. Because access is limited, many dipnetters have opted to use their own boats to access the river and to dipnet salmon. Dipnetters have a set annual limit and once that limit is reached, they are done for the year. Dipnetting from boats is a popular means of obtaining that limit.

Prop.12 - oppose

Prohibit dipnetting from a boat when within 50' of a person dipnetting from shore in Chitina Subdistrict.

Talk about an enforcement nightmare.

Prop. 13 - oppose

Prop. 14 &15 - oppose

Prop. 16 - oppose

Prop. 17 - oppose

Prop. 18 - support

Prohibit dipnetting from a boat within 75' of any operating fish wheel.

Enforcement nightmare.

Prohibit use of gillnet mesh in dipnets because it harms king salmon to be released that are tangled in the mesh.

Alaska regulation 5AAC 39.105 states a dipnet mesh must be less than 4.5" stretch mesh. In my experience, the only problem with releasing fish from gillnet mesh is the smaller sockeyes that actually get stuck halfway through the mesh. King salmon, no such problem.

Prohibit the use of depth or fish finders on boats in the upper Copper River District.

The only person I know that tried to use a fish finder in the Copper said it was of little use in the fast, heavily silted water.

Establish specific permit and bag limits when dipnetting from a boat in the Glennallen subdistrict. (The Glennallen subdistrict is the subsistence area upstream of the bridge, not a personal use area.) Access to shore based dipnetting upstream of the bridge is very limited due to private land ownership and few roads accessing the river. Dipnetting from boats is a means by which some people are able to harvest their salmon. Shore and boat dipnetting should continue under a unified permit structure – there is already a checkbox for

selecting gear type when applying for the permit.

Extend lower boundary of the Chitina subdistrict 1/2 mile downstream.



This is a Chitina Dipnetters Association submitted proposal to address a safety issue. A favorable and high use area from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free, saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with 15 or more boats drifting the same area. Extending the existing CPUDF lower boundary 1/2 mile downstream would allow more spacing between boats, and alleviate the congestion of boats that occurs now.

Prop. 19 - oppose

When by June 1 the commercial harvest is 50% below the 10 year average, then the Chitina Personal Use sockeye allocation would be reduced from 150,000 to 50,000.

The Personal Use harvest times and lengths are dictated by actual sonar counts. When run numbers are low, it shows in the sonar counts and F&G reduces the PU dipnet opening times and lengths accordingly to meet in-river goals. When commercial harvests are low it is reflected in low sonar

counts triggering reduced fishing time in the PU fishery. To reduce the PU fishery allocation on top of reduced fishing time is a double hit. If the run rebounds 2 weeks later, the PU fishery would still be stuck with a 2/3s allocation reduction.

Prop. 20 - oppose

Prop. 21 - support

Prop. 22 - support

Prop. 41 - oppose

Reducing the annual limit in the Chitina subdistrict to 15 salmon for a household of one and 30 salmon for a household of more than one. CDA fought hard to get the Personal Use annual limit raised to 25 for the permit holder and 10 fish for each additional household member. F&G supported this bag limit increase at the 2014 Cordova PWS/Copper River finfish BOF meeting. It standardized the PU annual limit between South-Central Alaska PU fisheries and the Chitina PU fishery, thus eliminating confusion between the PU fisheries and making it a more equitable harvest for larger families.

Amend the opening date of the Chitina PU. fishery from June 7 to June 1.

If salmon sonar numbers warrant it then the Chitina PU fishery should open On June 1 as it did in the past.

Eliminate the Customary and Traditional finding for finfish other than salmon in the Chitina subdistrict.

If there is no customary and tradition finding for salmon in the Chitina Subdistrict, then why should there be a positive finding for other finfish?

Repeal mandatory closed waters from the Copper River King Salmon Management Plan.

Mandatory inside closures during commercial fishing statistical weeks 1&2 were initiated to protect those early run kings, that thru F&G radio telemetry programs, were determined to be those fish that go farthest upriver to spawn and supply the upper Copper subsistence fishery. To say that in the last several years the king salmon population has been healthy is a stretch as I remember upwards 20 years ago that today's total annual king run for the Copper River of say 60,000 is what the commercial fishermen out of Cordova were harvesting and we still met the total in-river goal.

Submitted By
John nobles
Submitted On
11/7/2021 7:41:37 AM
Affiliation



PC119
1 of 1

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2485 chief Nickoli
Fairbanks , Alaska 99712

I appose to these copper river changes. Why would you even consider banning boats from dip netting. That makes no common sense. My boat is a jet boat and in no way can harm a fish. Fishing from a boat is one of the best ways to fish in any lake or river. It provides me with better access to the spots and is safer. I have personally fell in the river from one of the spots you are dropped off at. That is such an unsafe way to fish. Again I appose.

Submitted By
John Stack
Submitted On
11/14/2021 8:12:27 PM
Affiliation
Area E Drift permit holder



PC120
1 of 6

I urge the board to reject Proposal 5.

An optimal escapement goal of 40,000 Chinook is not supported by ADFG, nor is it based on the Biological Escapement Goal for king salmon in the Copper River drainage. In 2017, ADFG recommended lowering the goal to 18K for the health and sustainability of this Chinook run. The Board should defer to the Department's recommendation of all escapement goals pertaining to this watershed.

Submitted By
John Stack
Submitted On
11/14/2021 8:23:50 PM
Affiliation
Area E Drift permit holder



PC120
2 of 6

Support proposal 7

Prevent subsistence from becoming a commercial enterprise.

Submitted By
John Stack
Submitted On
11/14/2021 8:38:08 PM
Affiliation
Area E Drift permit holder



PC120
3 of 6

Please Support proposal 17

These bag limits seem generous and would help with conservation of stocks.

Submitted By
John Stack
Submitted On
11/14/2021 8:47:03 PM
Affiliation
Area E Drift permit holder



PC120
4 of 6

Please Support proposal 19

It makes sense that in years of low abundance, all user groups share in the conservation of the stock.

Submitted By
John Stack
Submitted On
11/14/2021 9:06:42 PM
Affiliation
Area E Drift permit holder



PC120
5 of 6

Please Support proposal 38

In years of low coho abundance, conservation efforts should be shared by the sport fishery.

Submitted By
John Stack
Submitted On
11/14/2021 9:15:53 PM
Affiliation
Area Drift Permit holder



PC120
6 of 6

Please Support proposal 41

It makes sense to allow FG to manage the fishery based on observations of abundance and not have mandatory closures imposed by regulation.

Submitted By
Johnathan J Hulsey
Submitted On
11/7/2021 1:32:52 AM
Affiliation
None



PC121
1 of 1

Proposal 7 - Oppose
Proposal 8 - Oppose
Proposal 9 - Oppose
Proposal 10 - Oppose
Proposal 11 - Oppose
Proposal 12 - Oppose
Proposal 13 - Oppose
Proposal 14 - Oppose
Proposal 15 - Oppose
Proposal 16 - Oppose
Proposal 17 - Oppose

Submitted By
Jordan Bancroft
Submitted On
11/11/2021 7:47:18 PM
Affiliation



PC122
1 of 1

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My family dipnets from a boat on the copper so harvesting via boat is critical for us to get our fish. We do not support any proposal that would restrict access to the dipnet fisheries.

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
jordan stover
Submitted On
8/13/2021 8:01:29 AM
Affiliation



PC123
1 of 1

Would like the board to consider gear options for the PWS/Copper River drift gillnet fleet to use a 150 fathom purse seine net.

Options that are already going on in fisheries along the west side of Alaska.

Bycatch rates and mortality on current gear, gillnets, can be very high. Fish getting shaken out and falling to the bottom of seafloor severely fatigued or dead. Along with areas being taken over from multiple generations of marine mammal predators having breakfast, lunch and dinner from a web curtain being hauled flat/vertical. Ghost nets. (lost gillnets continuously killing for years)

When the gillnet fleet targets a certain species, say chums, majority of reds and pinks are being scraped and fatigued going through net web. Resulting in over escaping of certain systems and unknown surplus of natural resources. After decades of targeting a certain size, typically large, from schools it is causing only small fish to make it up river to spawn.

Seine nets are widely known as a more conservative and selective gear type. A small class seine fleet (compared to existing seine fleet) in PWS/Copper River, I believe will address many concerning issues along with lower bycatch of mammals and of fish species and a more consistent evaluation of river systems. Better product and more opportunities for fishing pinks. In times of conservative management, say King salmon, will provide more fishing time to fleet and the ability to release.

Submitted By
joseph f fleming
Submitted On
11/9/2021 3:36:28 PM
Affiliation
commercial fisherman



PC124
1 of 1

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14807354167
Email
josephfleming52@hotmail.com
Address
6948 fairweather dr. Dowling
anchorage, Alaska 99518

November 8, 2021

To the Board of Fisheries:

My name is Joseph Fleming. I have fished in Prince William Sound for 50 years as a setnetter and drifter. I do remember when Eashamy was basically a senetters' district that had fishermen harvesting a thriving natural run of Eshamy River reds. When the hordes of drifters from Cordova invaded the district, fishing numbers took a nosedive. Seiners were allowed to fish off of Chenega, and that also contributed to the drastic decrease in the natural run of reds and chums. The astounding solution the Fish and Game came up with was to shut down setnetters year after year during the 70's until the permits were practically worthless.

The Main Bay Hatchery and an improvement in management saved the value of permits. That being said, it has been a battle for years to keep the drifters drifting drifting instead of setnetting between setnetters' registered sites. Drifters managed to get into the books that they could fish 50 fathoms away away from setnetters' nets that had to be 100 fathoms apart and 25 fathoms away from setnets that had to be 50 fathoms apart. Any person with common sense could see that it would be an impossible task to hold a a drifting net exactly on the legal mark.

Then the drifters and seiners took it a step further and had an allocation plan created by crying that setnetters were catching too many fish in comparison to drifters. This plan to make fishing more equitable was just a way to squeeze and shorten the time setnetters have their nets in the water. The time has been whittled down to 36 hours a week like in 2021. The huge seining and drifting fleets have had their way in controlling the small group of 18 to 20 setnetters who fish hard every opener. Crewmembers have to tirelessly wait for days in very remote camps before they are allowed to fish again, and food bills, restlessness, and bad weather make matters even worse.

To put an allocation of 4% was a terrible injustice to begin with, and now drifters are trying to change the trigger points to further decrease fishing time for setnetters. This is obscene and anyone pushing for it should be ashamed of themselves. I have been a drifter since 2006, and I do not advocate for any changes that would make any fisherman sit idly by on the beach while the fish are running. Setnetters have no other district to fish in like drifters, so they shouldn't stand for any regulations that devalues their fishery. The whole allocation plan should actually be challenged in court.

Joseph Fleming



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 1:17:20 PM
Affiliation
Area E permit holder F/V Wild Salmon

Phone
907-290-0976
Email
jdmeredi@gmail.com
Address
PO Box 1731
Cordova , Alaska 99574

I strongly support Proposal 6. As a commerecial permit holder in Area E all my fish caught are reported with AD&FG and are utilized for management purposes of the fishery.

With today's technology this should be a simple task for ALL people utilizing the fishery including sport, personal use and subsistence.

I feel the Board should PASS this proposal.



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 1:54:07 PM
Affiliation
Area E permit holder F/V Wild Salmon

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907-290-0976
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jdmeredi@gmail.com
Address
PO Box 1731
Cordova , Alaska 99574

I strongly support Proposal #7.

No commercial enterprise should capitalize on subsistence fisheries including personal use or subsistence. As an Area E permit/permit owner and pay taxes and fees to both the state of AK and City of Cordova. It seems out of order to be finically competing with charter companies up river in the Chintina district who are aiding local Alaskans on their personal use and subsistence adventures. These companies pay less fees and taxes and are reaping financial rewards.

I feel strongly the Board should Pass this proposal.

Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 2:24:08 PM
Affiliation
Area E permit holder F/V Wild Salmon



PC125
3 of 5

Phone
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Address
PO Box 1731
Cordova, Alaska 99574

Support: Proposal #19

I support bringing back the 2017 rules that during low abundance seasons that both down river and up river groups should share the burden. When counter numbers are low and return fish stocks are lower the commercial fleet is closed to fishing. This has never been more apparent that the last several seasons with us lucky if we get one 12 hour opener a week.

I strongly support the Board passing Prop #19

Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 2:36:04 PM
Affiliation
Area E permit holder F/V Wild Salmon



PC125
4 of 5

Phone
907-290-0976
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jdmeredi@gmail.com
Address
PO Box 1731
Cordova , Alaska 99574

Proposal #10: SUPPORT

I believe that boats should be used as transportation to unreachable beach and shore areas to dip net. However using a boat with dip net attached to essentially "trawl" up and down stream seems excessive.

I strongly SUPPORT the Board passing Prop #10.



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/15/2021 11:25:34 AM
Affiliation
Area E permit holder F/V Wild Salmon

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jdmeredi@gmail.com
Address
PO Box 1731
Cordova, Alaska 99574

Support: Proposal #8

As dip net charters become more popular in Chitina it is becoming more frequent for groups to be dropped off at the confluence of tributaries merging with the Copper River. Passing this proposal would give salmon additional opportunity of reaching these confluences and entering tributary waters for spawning.

I wish the Board would PASS this proposal.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 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,

Julian Reutov
layzee.jr@gmail.com
(907) 299-4523



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial fisherman and live in Cordova. I am also a PWSAC board member and fish with my oldest daughter, who is also on the crew. Commercial fishing helps support my family, supports the town of Cordova, offers many jobs between fishing jobs, net repairs, mechanics, parts, hydraulics, etc., and most importantly provides a healthy resource to people all across the world that otherwise wouldn't have access.

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,

Justin Ryan
Justinryan0307@gmail.com
(907) 831-0905

Submitted By
Keith Dienstl
Submitted On
11/7/2021 7:20:36 AM
Affiliation
Resident



PC128
1 of 1

I STRONGLY OPPOSE PROPOSALS 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20. Access to the Copper River Dipnet Fishery is an inherit right to all Alaskans and should not be limited or restricted in any way!!

I STRONGLY SUPPORT PROPOSAL 18!!

I STRONGLY SUPPORT PROPOSAL 21!!

I STRONGLY SUPPORT PROPOSAL 22!!

Submitted By
Keith Genter
Submitted On
11/9/2021 6:20:13 AM
Affiliation



PC129
1 of 1

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akkgenter@gmail.com
Address
PO Box 874953
Wasilla, Alaska 99687

I wholeheartedly support and agree with the Chitina Dipnetters Association. Please continue to allow us to harvest our salmon annually. Our needs should be a higher priority than the commercial fishing industry. Thanks in advance for your time and effort, CW4(R) Keith D. Genter

Submitted By
Kelly M. Smith
Submitted On
11/14/2021 8:51:39 PM
Affiliation



PC130
1 of 2

Phone
9075754151
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akbulldogs@gmail.com
Address
HC60 292D
River Root Farm
Copper Center, Alaska 99573

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 fowling 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 take and an additional burden on the user to obtain multiple permits and additional reporting.



PC130
2 of 2

Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. Or, 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 - Strongly support!



From: [Ben Mohr](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Haight, Glenn E \(DFG\)](#)
Subject: Withdraw KRSA Proposal 5 (HQ-F20-044)
Date: Monday, October 25, 2021 3:40:08 PM

Good afternoon,

I'm writing today to request that Proposal 5 (HQ-F20-044) for the upcoming Prince William Sound Finfish and Shellfish meeting be withdrawn from consideration by the Board of Fisheries. KRSA no longer wishes to offer this proposal.

Can you please confirm this will be pulled?

Thanks,

Ben Mohr

Executive Director

[Kenai River Sportfishing Association](#)

907.262.8588 office

907.223.7635 mobile



2021-2022 Board Members

Bill Eckhardt, *Chair*
Retired President, AK USA FCU

Jim Brady, *Vice Chair*
President, Brady Investments, LLC

Reuben Hanke, *Vice Chair*
Owner, Harry Gaines Kenai River Fishing

Kevin Branson, *Secretary/Treasurer*
CPA, Thomas, Head & Greisen

Kristin Mellinger, *Vice President*
Owner, V3 Strategic Solutions, LLC

Ross Baxter
Ross Baxter Group, Jack White Realty

Rik Bucy
Retired, Tesoro Northstores

Joe Connors
Owner, Big Sky Charter & Fish Camp

Laura Edmondson
CFO, Bering Straits Native Corp.

Dick Erkeneff
Owner, Kenai River Raven

Ed Fogels
Retired, AK Dept. of Natural Resources

Linda Leary
Owner, Fishewear

Derek Lechlitter
Owner, Legacy Electric

Bill MacKay
Retired, Senior VP, Alaska Airlines

Verne Martell
Retired, Alaska Pasta Company

Eldon Mulder
President, The Mulder Company

Mike Pawlowski
Partner, Strategy North Group

Emeritus

Bob Penney
Chair Emeritus

November 15, 2021

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

RE: Prince William Sound/Upper Copper and Susitna Rivers Finfish and Shellfish

Dear Alaska Board of Fisheries:

The Kenai River Sportfishing Association (KRSA) is a nonpartisan, nonprofit fishery-conservation organization that works to ensure the long-term health and sustainability of fishery resources in the Kenai River, Cook Inlet and elsewhere in Alaska, through advocacy of sport and personal use fisheries and the promotion of science-based fishery management and conservation. In pursuit of this goal, KRSA respectfully submits the following comments regarding proposals under consideration at the upcoming Prince William Sound/Upper Copper and Susitna Rivers Finfish and Shellfish Board of Fisheries meeting.

Proposal 5 – KRSA submitted this proposal. After careful consideration of the new Sustainable Escapement Goal suggested by the Department, KRSA would like to respectfully withdraw this proposal and support the ADFG suggested Sustainable escapement goal of 21,000-31,000 king salmon for the Copper River.

Note: KRSA would like to echo the comments submitted by AK eXpeditions, LLC on Proposals 6-22.

Proposal 6 - Oppose! Reporting as of now is works fine; requiring 3-day reporting impacts travel plans because lack of internet access in the area could impact travel 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 in the fishery.

Proposal 8 - Oppose! Language in this proposal 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 in this proposal 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 Alaskans to Dipnet from the shore, requiring personal use fishers to stand on slippery rocks or wade into the river. This puts users at undue risk.

Proposal 11 - Strongly Oppose! This proposal would mean all boaters who navigate their boats into the canyon could only tie off to the canyon walls or shore. Forcing Alaska residents to navigate their boats into challenging currents is a recipe for disaster and puts undue risk to the fisherman and their passengers.

Proposal 12- Strongly Oppose! There are 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, while there are nearly 20 miles of riverbank for people who wish to Dipnet from shore. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetters 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 all other users to fish across the river on the West Bank of the Copper. One person's "too close for comfort" is not another's. Data need to be provided that demonstrate actual accidental contact or fowling 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 will necessarily navigate around these hazards. Whether it's a Fishwheel operator who drives a boat to their wheel or a dipentter, motors are momentary sounds which pass quickly and do not impact fishing success.

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, while many others also utilize aerial spotters and other means effectively to navigate and to locate fish.

However, unlike our commercial counterparts, using sonar on the Copper River is used more as an 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 unseen structures 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 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 is 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 efficient 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.

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

Proposal 22 - Support!

Proposals 49-55 KRSA has long and vocally supported halting increases in hatchery production of pink salmon from Prince William Sound hatcheries until such time as issues surrounding straying and competition with other species and stocks of salmon, particularly king salmon, that inhabit



the North Gulf Coast of Alaska are further clarified. To the extent that one or all of these proposals serves as a vehicle to the objectives that we have advocated KRSA support that effort.

Sincerely,

A handwritten signature in blue ink that reads "Ben Mohr". The signature is fluid and cursive, with the first and last names clearly distinguishable.

Ben Mohr
Executive Director

Submitted By
kenneth Renner
Submitted On
11/15/2021 4:55:47 PM
Affiliation



PC132
1 of 1

Phone
907 9036184

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utopia_renner1@hotmail.com

Address
305 Observation Avenue, Cordova, AK, USA
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

PROPOSAL 21: OPPOSE

PROPOSAL 38: SUPPORT

PROPOSAL 40: SUPPORT

PROPOSAL 41: SUPPORT

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



To: Alaska Board of Fisheries

11/5/2021

From: Kenneth Roberson

1284 Rainbow Lane

Fernley, Nevada 89408

E-mail: owlkrvr@sbcglobal.net

Attn: Board Members

My name is Kenneth Roberson, I was employed by ADF&G for 25 ½ years (from 1968 to 1993) with nearly 24 of those years in Glennallen, AK. During those years, I was with the Commercial Fish Div. most of the time, jointly with Habitat Div. during Pipeline Construction and lastly with the FRED (Fisheries Rehabilitation, Enhancement and Development Div. For 20 plus of those years I was responsible for the management of the Personal Use and Subsistence Fisheries on the Upper Copper River. I conceived of and supervised the development of Gulkana Hatchery starting with 200,000 eggs in 1973 and by the 1980's a capacity of 35+ million eggs which generated a return in the neighborhood of 300,000 sockeye. I started the hatchery as a research project with the goal of replacing some of the spawning area lost due to flooding and later highway realignment (Rehabilitation) and eventually we achieved (Enhancement) levels of production. **All of my comments relate to my concern for the Gulkana Hatchery and the lack of achieving adequate eggs takes in recent years (only 12 million eggs in 2021).**

I started work in Alaska in 1961 (1961 to 1968) working for the Fisheries Research Institute with the University of Washington on the Wood River Lakes north of Dillingham, in Western Alaska.

In 1993, the State of Alaska turned most of the ADF&G hatcheries over to the Private Non-Profits thus ending my position as Hatchery Manager. I chose to stay in Glennallen and retire rather than take another position elsewhere. Several years after retiring, I was asked to join the Board of Prince William Sound Aquaculture Corp. due to my experience with Gulkana Hatchery. **I am currently on the Board of PWSAC; however, my comments are my own and I do not represent PWSAC in any way at this time.**

I currently live in Nevada but I maintain a careful watch on all aspects of the Copper River salmon issues plus being a PWSAC Board Member.

Proposal Comments:

Proposal #6 – Require in-season catch reporting – **Favor this proposal** – **Currently**, catch reports dribble in for months after the salmon are taken, thus there is no information on the actual harvest levels in-season. The current Management Plan indicates the salmon may take two weeks to ascend the river to the Chitina area while “in fact” it can take up to six weeks for that effort. Management of the “Upriver” fisheries can not be based solely on the Sonar counts, it must also take into account the river level, catch reporting and also current genetic sampling conducted by ADF&G. The Regulation 5 AAC 01.616 (b)(1)(A)(B)and (C) set allocations for three areas of the Upper Copper River District and yet catch reports are not due until October 31, thus there is no in-season management of the catch.



Under 5 AAC 39.222, the Board has the responsibility to: **Manage Sustainable Salmon Fisheries** which includes sections (a), (b), (c)(1)(A)(i-v),(B-G), (2)(A-H), (3)(A-C). The essence of this is that the Gulkana River has had poor to very poor escapements since the flood event of 2013. Similar events took place in 1964 and 1971 moving masses of sand, gravel and boulders out of the river reach between Summit Lake and the Denali Highway bridge, an area that includes the Gulkana Hatchery. Escapement survey data collection has been impaired by budget and time constraints since 1992 when I was last responsible for that activity thus the deterioration of the escapements to the Gulkana River in general and specifically Gulkana Hatchery have not been given appropriate attention. In particular, the egg takes at Gulkana Hatchery have gone down significantly over the past 5 years with the 2021 egg take only 12 million eggs of the 35 million egg take goal. Natural spawning in the adjacent stretch of river did no better. My plan in 1973 when I started the hatchery project was to replace spawning production lost due to the 1964 and 1971 flooding and the encroachment of the Richardson Highway rebuild that increased the river speed and reduced the channel width of the river. We were highly successful until the 2013 flooding event. **There needs to be a significant increase in escapement evaluation and added protection to the Gulkana River in order to regain it's normal significant contribution to the overall Copper River salmon production.**

Proposal #7 – Prohibit guiding in the Subsistence Finfish fishery – **Favor** – Seems contrary to the intent of a subsistence fishery to allow guiding.

Proposals #8, #9, #10, #11, #12 and #13 – **Favor the intent of all these proposals** – The use of moving boats to dip net from is a relatively new innovation; however it is neither **cultural** or **traditional** in any sense of the words by definition whether by dictionary or Alaskan legal terms. It was well after 1969 before any boats were operating in the Chitina area and later that guides began operating almost entirely down into Wood Canyon. Dipnetting from a boat constitutes a “new and illegal” fishing technique. It constitutes “trawling” with a dipnet, a technique not defined in Subsistence or Personal Use regulations thus for reasons stated below, should be prohibited. In 5 AAC 39.016 (d) (10)(Commercial Salmon Regulations), a trawl is a bag shaped net towed through the water to capture fish or shellfish. **It's time to put an end to this illegal method !**

A moving boat with one (or more) dip nets can reach every single resting, holding or concentration area in all of both the Chitina and Glennallen Subdistricts. Every eddy, creek mouth or any other place where the fish are concentrated and resting become “target areas”. In the Commercial Fishing areas, these operations are called “creek robbers” and of course illegal. Obviously, the technique is highly effective and potentially damaging to smaller stocks. With it being so easy to capture large numbers of fish very quickly, it's almost an incentive to take more. It has become a rich man's sport rather than a subsistence and personal use fishery. Put an end to dip netting from boats !

Proposals #14 & #15 – Prohibit gill net mesh in dip nets – **Favor** – If any large mesh is used, the salmon, other species and especially Steelhead can be injured and possibly die before release whereas standard netting will prevent this problem.

Proposal #16 – Prohibit the use of fish finders – **Favor** – It seems that a few persons with expensive boats and equipment are impacting places where the salmon rest thus not taking a few from each group of salmon as the migrate up the river. This is especially onerous when boat



operated nets can target the various stream and river mouths plus other places with eddies that the salmon rest in. They salmon have no place to hide and rest. Eliminating dip netting from boats is preferable (See notes on all the dipnetting from boats proposals). **Again, this method is neither cultural or traditional in this fishery.**

Proposal #17 – Establish bag limits for fishing from a boat in Glennallen Subdistrict – **Favor** – Better than nothing but eliminating dip netting from boats is far preferable (See notes on all the dipnetting from boats proposals)

Proposal #18 – Extend lower limit of Chitina Subdistrict – **Strongly oppose** this proposal for two reasons:

#1 – The area includes Haley Cr. and Canyon Cr. where salmon (especially sockeye) school and rest before ascending Wood Canyon especially during periods of high flow. There are also additional areas where the salmon rest and would be easy targets for boats with dipnets. Allowing dipnetting (especially from boats) would eliminate the few resting areas available to salmon. Also see my comments on all the dipnetting from boats proposals !

#2 – The area described by the proponents is where a number of years ago; illegally in the area, a boat with three men and a boy, tied on to a tree in the channel trying to pull it out, had the boat swamped with two of the men drowning and only the boy's life jacket saving him and his father. The area is extremely dangerous and should never be opened for safety reasons.

Proposal #19 – If commercial catch 50% below 10 year average by June 1, Chitina Subdistrict catch reduced to 50,00 salmon. **Agree with concept but becomes an allocation and management issue** – See my comments on Proposal #6 which becomes a necessity to perform this action. Need more flexible overall in-season management of the Personal Use and Subsistence fisheries.

Proposal #20 – Reduce bag limits to historical levels in Chitina Subdistrict – This is an allocation issue which proper in-season management should take care of. I personally find the bag limits excessive and subject to abuse and wastage.

Proposal #21 – Change Personal Use open date back to June 1. – **Oppose** - The date was adjusted to protect king salmon and should be retained for that reason.

Proposals #22 and #23 – Remove C&T finding for fish other than salmon and Remove C&T finding for Rainbow/Steelhead – **Oppose** – There is no reason for this change ! Steelhead in particular are present in very limited numbers and need all available protection.

Proposals #24, #25 and #30 are ADF&G proposals - Agree (Favor) each of them.

Proposal #31 – Increase sockeye salmon sport fishing possession limit – **Oppose** this proposal since it would add pressure to the stocks in the Gulkana River that are already seriously stressed and not achieving adequate escapements.

Submitted By
Kevin Masterson
Submitted On
11/7/2021 10:26:26 AM
Affiliation
None



PC134
1 of 1

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Proposal 7 – Strongly Oppose. This is the only way some people can access this fishery.

Proposal 8 – Oppose. This is a subsistence fishery, of course the limit will be higher than a sport fishery.

Proposal 9 – Strongly Oppose. Again, this is the only way some people can access this fishery.

Proposal 10 – Strongly Oppose. Again, this is the only way some people can access this fishery.

Proposal 11 – Oppose.

Proposal 12 – Strongly Oppose. There is a huge difference between a person, mostly stationary on the shore and a boat floating by. Most boat operators try to avoid shore dip netters any way, making this a non-issue.

Proposal 13 – Strongly Oppose. There is plenty of room for everyone on the river. 75 feet is excessive.

Proposal 14 – Strongly Oppose. Based on a false premise. In most cases, the fish are not in the dipnet long enough to harm them.

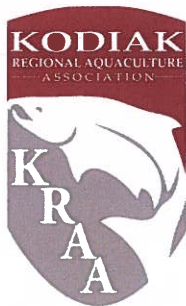
Proposal 15 – Strongly Oppose. again, Based on a false premise. In most cases, the fish are not in the dipnet long enough to harm them.

Proposal 16 – Strongly Oppose. Depth finders also serve a safety function to help from running aground or into submerged object which can damage boat.

Proposal 17 – Strongly Oppose. This is a subsistence fishery. If the dipnet limit is capped at a lower limit, will the fishwheel limit also be capped at the same lower limit?

Proposal 19 – Strongly Oppose. There is a recognized difference between a commercial fishery and a subsistence fishery. Just because the commercial fishers are not getting rich, doesn't mean subsistence users should go hungry.

Proposal 20 – Strongly Oppose. Again this is a subsistence fishery, if you are worried about escapement, why not limit the commercial fishery?



KODIAK REGIONAL AQUACULTURE ASSO

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

November 15, 2021

RE: Prince William Sound Finfish and Shellfish, November 30-December 6, 2021
Opposition to Proposals 49, 50, 51, 52, 53, 54 and 55

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) respectfully requests that the Alaska Board of Fisheries reject Proposals 49-55 at the upcoming Prince William Sound/Upper Copper and Upper Susitna Finfish and Shellfish meeting in Cordova. As a whole, Proposals 49-53 lack coherence, detail, offer inappropriate regulatory structures, and would impose costly research and monitoring/assessment efforts on the Department. Proposals 54 and 55 provide no evidentiary support or basis for the desired hatchery production reductions and lack specificity such that adoption of Proposal 55, in particular, would likely affect all hatchery programs in the state of Alaska, not just those in Prince William Sound.

The Board will remember that it's been nearly four years since the current targeting of hatchery programs began at the February, 2018 Sitka Board of Fisheries meeting. In that time, hatchery issues have been before the Board at almost every meeting. The Board, the Department, hatchery operators, and the public have repeatedly been treated to various iterations of claims and proposals similar to what you will review at the upcoming meeting. At each turn, a great deal of time and resources—human and financial—has been required to respond. The Board has, on each occasion, rightly rejected this systematic effort to malign Alaska's hatchery programs and their underlying science, management, and oversight by ADF&G.

New Board members may not recognize the redundancy of proposals 49-55. To illustrate this redundancy for the Board, I have included with this document a selection of KRAA's comments on these same topics from previous meetings. KRAA has submitted over 30 pages of similar comment to the Board over the past four years. KRAA's comments are a fractional representation of the time and effort demanded of those who have been forced to respond to repetitive proposals and to defend the Alaska Hatchery Programs.



In addition to KRAA's comments, I would draw your attention to the information and documents presented during the October, 2018 Board of Fisheries Work Session, and one document in particular, specifically related to claims in proposals 49-53:

Special Publication No. 18-12; Salmon Hatcheries in Alaska—A Review of the Implementation of Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks. (Evenson, et.al, accessible through the Alaska Board of Fisheries website.)

As a whole, Proposals 49-53, without acknowledging the source, take language from the Policy of Management of Sustainable Salmon Fisheries and the State's genetics policy in an attempt to create regulations out of the State's current hatchery policies.

- **Proposal 49** targets the Prince William Sound Management and Salmon Enhancement Allocation Plan which is gear-group driven and would likely introduce unintended constraints on managers which could make it impossible obtain the allocation guidelines of the plan.
- **Proposals 50-53** target regulations specific to the Special Harvest Areas of individual pink salmon hatcheries in Prince William Sound
 - The current regulations are necessary to provide for the definition and extent of the Special Harvest Areas (SHAs) and apply to management actions necessary to provide broodstock collection, escapement and hatchery harvest.
 - The current regulations apply only to the SHAs and hatchery operations and as such have no application for management outside of the designated area as defined (unless temporarily expanded by EO).
 - One of the most disturbing elements of Proposals 49-53 is that "acceptable levels of straying" is undefined. The Board should avoid decision making without full consideration of the best available science regarding straying. KRAA believes the Board does not have adequate information to determine what straying percentages to fill in for the proposal's XXX regarding "acceptable levels" of straying.
 - As a fallback- the author suggests a hard 2% stray rate as the acceptable limit. The 2% figure is not well-supported by the scientific literature which contains a wide degree of variability in the assessment of natural stray rates in all species of salmon.
 - The scope of the straying assessment that would be required as a result of adoption of these proposals would be prohibitively costly to conduct on an annual basis.
 - The author paints all programs with the same brush and demonstrates limited understanding of the programs in question. For example, the Solomon Gulch Hatchery does not conduct remote release projects for pink and chum salmon—the species for which the author seems to have the greatest concern.)



- These proposals all assume that harm is occurring from the straying of hatchery produced salmon. However, much of the information gathered to date indicates that the hatchery programs have had little impact on wild stocks.
 - Nevertheless, the ground-breaking work of the Alaska Hatchery Research project continues to address the straying issue and the Board should wait for the results of the study to be finalized before making decisions about the “acceptable level of straying”.
 - Regarding Straying in Prince William Sound: 1) The overwhelming majority of returning enhanced salmon are harvested IN Prince William Sound, indicating a successful management strategy; 2) After more than four decades of pink salmon enhancement in Prince William Sound, genetic stock structure is still very evident for wild stocks—even those in proximity to hatcheries. and 3) during the 40 years of hatchery pink salmon production in Prince William sound, some of the largest wild stock returns on record have taken place—a number of those in the last decade.
- **Proposal 54** targets the Prince William Sound Management and Salmon Enhancement Allocation Plan
 - The Salmon Enhancement Allocation Plan is an allocation of enhanced salmon among gear groups and the proposal to limit production is outside the scope of the plan.
 - The proposal addresses incredibly complex issues regarding ocean carrying capacity for salmon. The proposer makes a host of assumptions from limited scientific data to conclude that the Board should find a need to limit hatchery production. Such a decision would not be based on the best available scientific information.
 - This proposal, if adopted, would likely make the Prince William Sound Hatchery programs unsustainable.
 - Large reductions in hatchery releases substantially change the economics for hatchery operations. Hatchery closures would be a net loss for Alaska’s salmon fishermen and the Alaska economy with no clear benefit to wild stocks.
- **Proposal 55** effectively targets all existing hatcheries in the State of Alaska and seeks to reduce the permitted capacity of all hatcheries for all species by 25% from the level to which those facilities were permitted in the year 2000.
 - This proposal was presented as an ACR in 2018 and was rejected for consideration by the Board at that time.
 - There appears to be no record of the “alleged” agreement. Such an agreement is not known to hatchery operators or the Alaska Department of Fish and Game.



- As mentioned in comments to proposal 54, there is very little rationale, scientific or otherwise, provided by the proposer to support the Board's reduction in permitted capacity.
- The proposal is presented as a new section of regulation under 5 AAC 40.1XX which begins with Article 3, Applicability of Regulations. These regulations apply generally to the process for issuance of a new hatchery permit.
- All hatchery permits receive in-depth review by the Department prior to issuance. The process takes years, thorough investigation and vetting, and detailed, scientific examination of the size of the project to be permitted.
- Again, should the Board adopt proposal 55, there would be widespread economic impacts to the communities and region. In many cases, the reductions in permitted capacity would compromise the associations' ability to meet debt service requirements to the State through the Fisheries Enhancement Loan Program.
- For illustration, I have included a summary of the probable impacts on KRAA's programs from the adoption of proposal 55.

In summary, KRAA asks that you please reject proposals 49, 50, 51, 52, 53, 54, and 55. Individually they have little merit or basis for adoption by the Board, and collectively they would do great harm to the viability of Alaska's salmon fisheries and coastal communities.

Thank you for the opportunity to submit these comments.

A handwritten signature in blue ink, which appears to read "Tina Fairbanks", is positioned above the typed name.

Tina Fairbanks
Executive Director



Kodiak Regional Aquaculture Association

Impacts, Proposal 55, as submitted by Virgil Umphenour

Proposal 55: Amend private-non-profit hatchery permits to decrease allowable hatchery production as follows: The Board of Fisheries would hold the private-non-profit (PNP) hatchery production to the 2000 level and decrease it to 25% of that level.

This information was initially prepared in response to an identical 2018 ACR which was considered and rejected during the October, 2018 Work Session. The impacts remain the same but have been updated to reflect preliminary local ex-vessel values paid in 2020/2021.

HISTORY/MERITS

- The 2018 ACR claimed there was agreement to reduce hatchery production by 25% in February of 2001; however there appears to be no official record of a decision or direction to reduce or cap production.
- This proposal if accepted or implemented is likely to have unintended negative consequences. As written, the proposal applies to all facilities in the State as well as all species and would likely have the greatest impacts on KRAA projects designed to have direct benefits to sport and subsistence users.

SPORT AND SUBSISTENCE IMPACTS

- KRAA's Subsistence and Sportfish production is provided at no cost to users. All costs are subsidized through Salmon Enhancement Tax collected from commercial salmon permit holders and through cost recovery activities.
- Programs impacted:
 - Crescent Lake sockeye and coho stocking projects (subsistence and sport) with direct benefit to the village of Port Lions would likely cease—unsupportable with reduced production.
 - Ouzinkie Sockeye saltwater net pen sockeye release and Katmai Lake coho stocking projects (subsistence and sport) would likely cease—not permitted in 2000.
 - Telrod Cove sockeye saltwater net pens with benefit to Westside fisheries and the Village of Larsen Bay (subsistence and commercial) would cease—not permitted in 2000.
 - King salmon production (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable with other program losses. First permitted 2000 may not qualify for continuation.
 - Coho Salmon Production, Kodiak Road system (sportfish)—loss of production, not permitted in 2000.
 - Rainbow Trout (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable.
 - Kitoi Bay hatchery coho (sport and commercial benefit)—likely 45% reduction in returns.
 - Kitoi Bay Hatchery Sockeye production (subsistence and commercial)—reduction in production, potential loss of program.

COMMERCIAL IMPACTS

- Impacts to production of pink, chum, and sockeye salmon: Overall potential loss of \$5-6 million annually in ex-vessel value.



- Pink salmon releases would decrease by over 35%, and, on average, the fishery would lose nearly 3 million fish on an annual basis.
- At 2020/2021 prices, that would constitute a potential **loss of approximately \$4 million in ex-vessel value** to the common property fishery annually.
- Chum salmon releases would decrease by over 30%, and, on average, the fishery would lose as many as 200,000 fish on an annual basis.
- At preliminary 2021 prices, that would constitute a potential **loss of as much as \$960, 000 in ex-vessel value** to the common property fishery annually.
- Reductions in sockeye salmon production at Kitoi Bay and Pillar Creek Hatcheries would result in potential loss of over 150,000 adult sockeye salmon per year.
- At preliminary 2021 prices, that would constitute a potential **loss of over \$1 million in ex-vessel value** to the common property fishery annually.
- In 2018 and 2020, and in the face of poor wild stock forecasts, KRAA conducted NO pink salmon cost recovery in order to allow for a viable commercial salmon fishery for Kodiak commercial salmon permit holders.
- In those two years, KRAA contributed over 50% and over 20% respectively.
- In 2021, KRAA contributed approximately 40% of the overall pink salmon harvest in Kodiak in a year with a relatively low odd-year wild stock return.
- KRAA's contribution to the commercial fisheries in Kodiak typically represents a smaller proportion of the overall fishery; however, as evidenced by the above recent figures, these programs can greatly impact viability of the commercial fisheries of the Kodiak Region when wild stocks do not support a robust fishery. That's why we are here. That's how we fulfill our role in our community and our obligation to the commercial salmon permit holders who support and fund our programs.

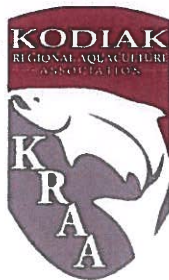
ECONOMIC/ORGANIZATONAL IMPACTS

- Enhancement provides stability and opportunity to the fishery; Supports reliable processing capacity and processing sector jobs as well as other support industries
- Generates added income for municipalities and local governments through landing tax on enhanced harvest
- Direct and indirect employment: KRAA employs 40-45 individuals per year with total payroll in excess of \$1.8 million annually. This likely equates to down-stream effects on over 400 local jobs.
- Reductions in production would likely mean loss of 8-12 positions (5 year-round, 3-7 seasonal positions) for KRAA
- Reduced production would decrease cost-benefit of programs. Many may become unsupportable.
- KRAA spends over \$1 million annually with local vendors and Alaskan companies
- Even with organizational cuts and efficiencies, cost recovery activities would consume a greater proportion of the returns and benefit to users.
- Debt Service: KRAA currently has FERLF loans totaling \$2.25 million. The association's ability to meet that obligation would likewise be compromised.



Supplementary comments by KRAA

- 1) July 7, 2018 comments to oppose the Emergency Petition to revoke the Valdez Fishery Development Association (VFDA) PAR for a 20 million egg increase.
- 2) October 3, 2018 to oppose ACRs 1 (prohibit VFDA incubation, rearing and release of increased eggtake capacity) and 2 (Cap statewide hatchery production at 75% of year 2000 levels) by Kenai River Sportfishing Association and Virgil Umphenour respectively.
- 3) October 8, 2019 in opposition of ACR 2 related to Northern Southeast Regional Aquaculture Associations chum remote release project in West Crawfish Inlet.



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Alaska Department of Fish & Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

July 7, 2018

Chairman Jensen and members of the Board of Fish,

This letter is in response to the emergency petition to halt the implementation of a PAR for increased pink salmon production at Valdez Fisheries Development Association's (VFDA) Solomon Gulch Hatchery. **I would like to encourage you to take no action on the request of the signatories on this petition to rescind the PAR awarded to VFDA.** The current petition attempts to subvert the established hatchery permitting process and cycle and brings to bear as evidence alarmist references to a list of scientific articles. Additionally, it runs counter to good public policy to hold an emergency meeting mid-summer, when those most likely to be affected by any decision have limited ability to participate in the public process.

At the outset it is important to realize there is a fact-based, scientific counter-narrative to the one that has recently been presented to you in public and written comment and in the media. Armed with the knowledge that there is a supportive base of information for the approved increase at VFDA, and the fact that essentially the same petition has already been submitted and rejected as not constituting an emergency within weeks of the current petition, the Board must reject this petition and proceed with the objective of gaining greater knowledge of the Alaska Hatchery Program as scheduled at the October work session.

Closer examination of the list of articles provided by the petitioners has demonstrated two basic findings: 1) much of the information that is highlighted by the petition signatories is neither new, nor unexpected, demonstrates no clear threat to the resource, and overall does not meet the stipulated criteria for an emergency; and 2) the petitioners rely on list of titles that they would have you believe condemn hatchery production and practice, but they themselves make no effort to demonstrate where these articles provide such conclusive evidence. Examination of the list of articles reveals that certain of these papers contain serious flaws and unsupported conclusions. In these instances, the articles often rely on weak correlations with low statistical significance which do little to support the authors' suppositions and conveniently ignore other factors that have been investigated as drivers of population dynamics and marine survival.

Despite the contention of the petitioners that the modest increase in production at VFDA's Solomon Gulch Hatchery presents an emergency, the information provided neither supports the assertion nor meets the Board's criteria for an emergency. Recent claims that hatchery production, and pink salmon production in particular, has been greatly on the rise for over two decades are not supported through the data. Following the increased production of the early 1990s, hatchery production in the State of Alaska and in the North Pacific has been relatively stable over the last 2.5 decades (Figures 1-3). The North Pacific Anadromous Fish commission tracks hatchery production and provides extensive information related to number and species. You can see (Figure 1) that US hatchery production represents only about 20% of the whole and has remained stable for an extended period. No distinction is made here to separate Alaska Hatchery production from that of Oregon, Washington, California, and Idaho.

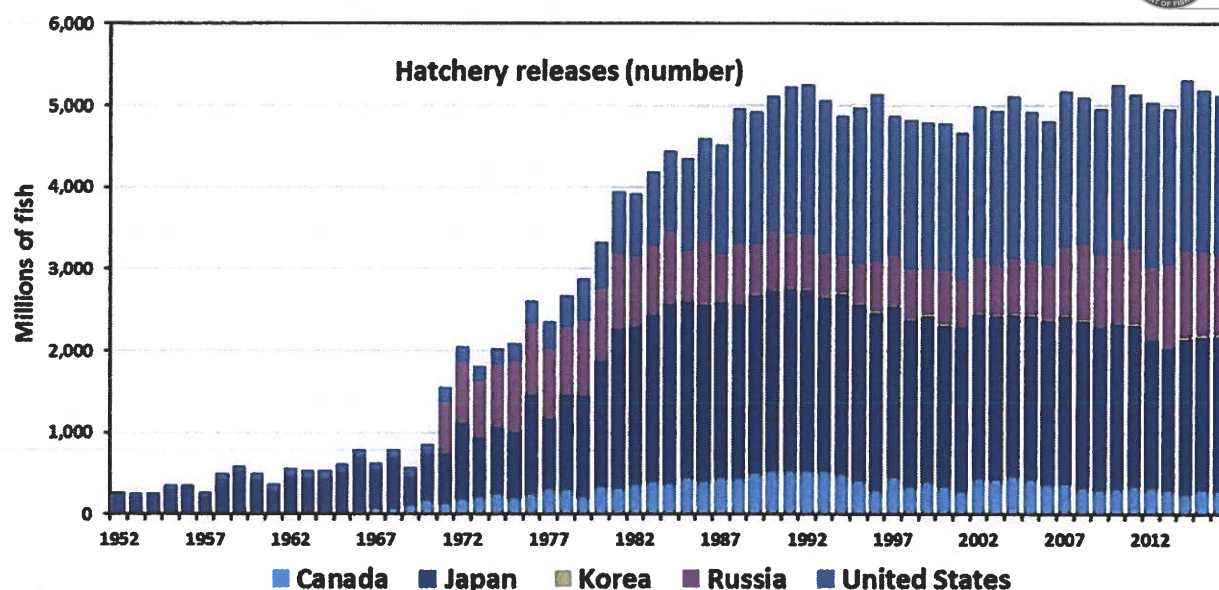


Figure 1. Hatchery releases, 1952-2016, Source: North Pacific Anadromous Fish Commission (NPAFC). 2017. NPAFC Pacific salmonid hatchery release statistics (updated 31 July 2017). North Pacific Anadromous Fish Commission, Vancouver. Accessed Month, Year. Available: www.npafc.org.

Of the hatchery releases to the North Pacific, Pink salmon appear to represent around 25% of the total hatchery releases (Figure 2). In Alaska, pink salmon represented just over half (53.8%, 894 million) of the overall hatchery releases in 2016 (ADF&G Alaska Salmon Fisheries Enhancement Annual Report, 2017, RIR No. 5J18-02), and in the context of overall hatchery production in the North Pacific, this represents approximately 18.8% of all hatchery releases to the North Pacific. Again, this figure further

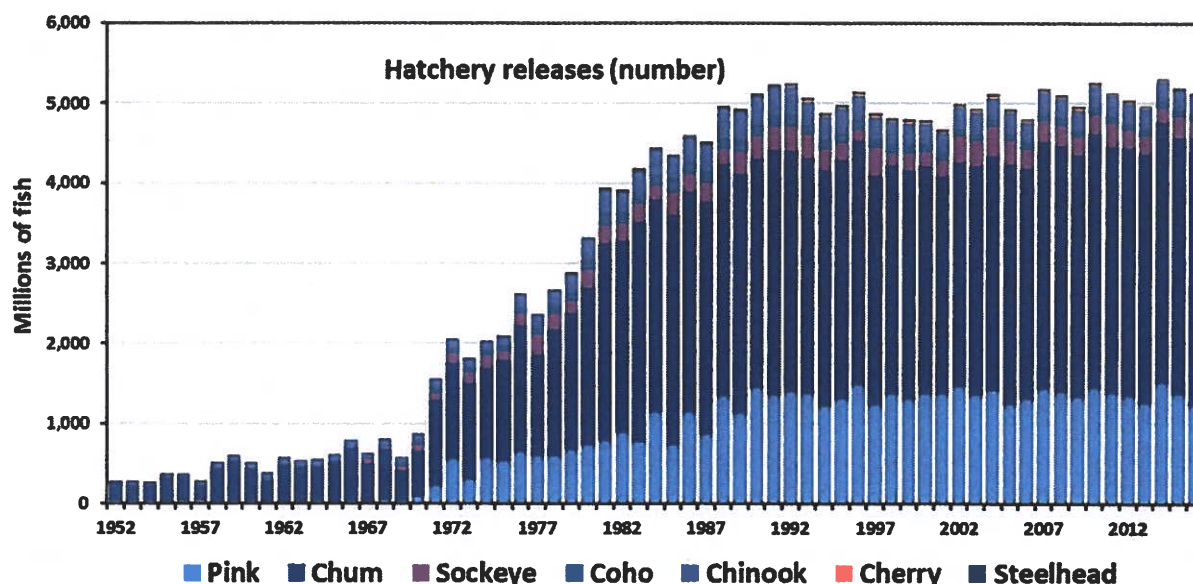


Figure 3. Hatchery Releases by Species, 1952-2016; Source: North Pacific Anadromous Fish Commission (NPAFC). 2017. NPAFC Pacific salmonid hatchery release statistics (updated 31 July 2017). North Pacific Anadromous Fish Commission, Vancouver. Accessed Month, Year. Available: www.npafc.org.



demonstrates the consistent trend in hatchery production over the last 2.5 decades. This trend of steady production has persisted and echoes a period of record high salmon abundance (hatchery and naturally produced) in the North Pacific as a whole. That there have been variable trends over time for various species in terms of body size, size at age, marine survival, abundance, etc. throughout this period of sustained high abundance is fair evidence that the relative constant of hatchery production is not the primary driver of those trends.

For Alaska taken alone and factoring in variability in survival at various life stages, Alaska Hatchery production for all species again reflects this relatively stable trend in production since the early 1990s (Figure 3).

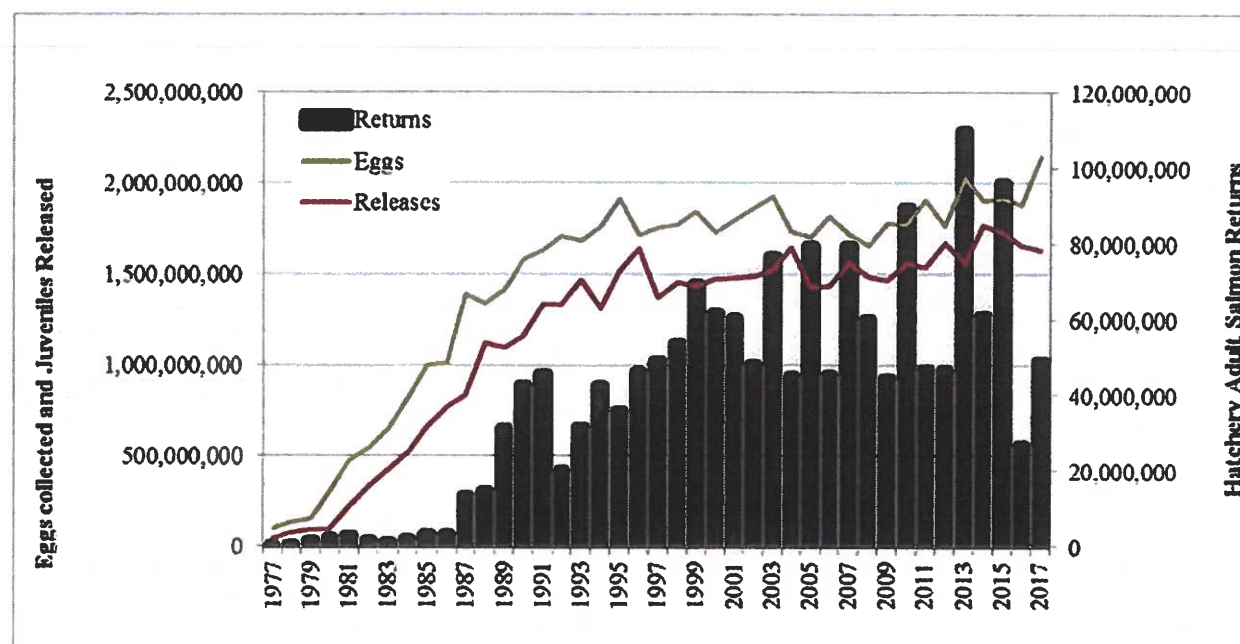


Figure 3. Total salmon eggs collected, juveniles released and adult return for Alaska salmon hatchery programs, 1977-2017; ADF&G Alaska Salmon Fisheries Enhancement Annual Report, 2017, RIR No. 5J18-02

Certainly, an increase in production of 20 million seems quite large, but taken in the context of the above figures, consider this: hatchery pink salmon from all countries make up approximately 15% of the pink salmon biomass in the North Pacific (Ruggerone, 2018). The increase in that percentage by the addition of the resultant juveniles (estimated at 18 million) from the approved PAR for VFDA represents a fraction of a percent. Through other lenses, this increase represents less than a 10% increase in the facility's production, less than a 3% increase in releases to the Prince William Sound, approximately 2% increase in the total pink salmon releases from Alaska Hatcheries, and as little as 0.1% of the pink salmon biomass in the North Pacific.

Further claims against hatchery production, such as those by the petitioners, imply that increases in hatchery pink salmon production threaten to upset the balance in ocean carrying capacity. The list of articles supplied by the petitioners does not establish with any credibility that the approved increase at VFDA constitutes an emergency by this means. The articles contain no conclusive evidence to confirm that a 2% increase Alaska hatchery pink salmon releases will have a negative impact on Alaska fishery resources now or in the future. For more detailed information please reference "Scientific Analysis &



Review of Journal Articles Submitted by Petitioners KRSA et.al.” Submitted by Alaska PNP Aquaculture Associations” as included with the written comment submitted by VFDA in relation to the emergency petition.

In an effort to support their claims, the petitioners provide numerous statements on hatchery production and regulation but make no statement as to how the approved PAR has not met the established process or policies (Factors 1-6 of the emergency petition). Subsequently, they make two contentions, one related to hatchery pink salmon presence (straying) observed in Lower Cook Inlet Streams in 2017 and another related ocean carrying capacity in relation to hatchery pink salmon production. In response to these contentions:

On Straying:

- 1) Straying of pink salmon an acknowledged consideration in the development of the Alaska Hatchery Program and is inherent to all salmon species—pink salmon especially. Discussion and investigation of hatchery straying is an ongoing part of the programs.
- 2) An understanding of the distinctions between stray rates and hatchery fractions is important to understanding both the hatchery otolith marks recovered in LCI in 2017 and the Hatchery-Wild Interaction study. Without that understanding, the LCI information has little relevance.
- 3) The collection of hatchery-marked otoliths collected by ADF&G in Lower Cook Inlet streams was conducted as a result of opportunistic sampling events in 2017. The sampling conducted was not a formal straying study structured to conduct representative sampling of a statistically significant portion of the returning population throughout the spawning period. The percentages indicated are not representative of stray rate or even hatchery fraction present in the overall escapement for 2017.
- 4) Furthermore, there is documented assessment of overall stray rates in the Prince William Sound for the initial years of the Hatchery-Wild Interaction study (2013-2015). This is the best science available in relation to potential straying trends associated with pink salmon stocks in the Prince William Sound.
- 5) Finally, an important factor in the approval of this par is the notable temporal separation between the early pink stock used by VFDA and other PWS stocks. This type of separation in run and spawn timing mitigates concerns related to straying. The local derivation of the early SGH stock as well as the existing temporal separation in the hatchery bloodstock made it ideal for hatchery use.

On Ocean Carrying Capacity:

- 1) A number of the scientific articles offered as evidence by the petitioners contain weak if not unsupportable correlations and conclusions while others, though sound science, don't carry the dire implications the authors of the petition imply. For example:
- 2) Ruggerone and Irvine, 2018, "Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean, 1925-2015"
 - a. This article indicates that 1990-2015 has been a sustained period of high salmon abundance of all species; pink salmon abundance has been more variable than other species and thus unlikely to be driving abundance of other species; and
 - b. The fact that hatchery pink salmon represent only 15% of the total pink salmon biomass in the North Pacific supports that pink salmon likely have only a low-to moderate impact on the food web.
 - c. This information, pulled from a single article provided by the petitioners is further indication that the petitioners' claims are sensational rather than substantial and should be discounted until such a time that the Board has gained better understanding of the hatchery programs and hatchery science. In the meantime established practice and process should stand.



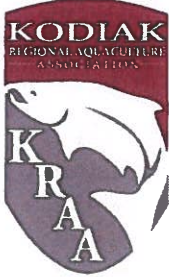
- 3) There are many potential drivers of ocean carrying capacity, marine survival, size at age, etc. such as climate regimes or climate events, sea surface temperature, increased marine mammal populations & etc. The following are two such examples of investigations that look at other drivers of abundance and survival of Chinook salmon:
- a. Siegel, J.E. M.V. McPhee and M.D. Adkison (2017) "Evidence that Marine Temperatures influence growth and Maturation of Western Alaska Chinook Salmon, Marine and Coastal Fisheries Dynamics, management, and Ecosystem Science 9:441-456, 2017."
 - b. Chasco, B.E. et.al (2017) "Competing tradeoffs between increasing marine mammal predation and fisheries harvest of Chinook salmon. Scientific Reports 1, Article number: 15439 (2017)."

Hatchery Operators from across the state are looking forward opportunity increase the knowledge and awareness of Alaska Hatchery programs and the foundational scientific principles with which they were conceived. The Board has scheduled time during the October 2018 work session to begin to better familiarize itself with the Alaska Hatchery programs and should not consider taking action in limiting or altering approved Hatchery permitting without greater knowledge of the programs and the science that supports them.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Fairbanks", is written over a horizontal line.

Tina Fairbanks
Executive Director
Kodiak Regional Aquaculture Association



KODIAK REGIONAL AQUACULTURE ASSO

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Alaska Department of Fish & Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

October 3, 2018

TO: Members of the Alaska Board of Fisheries

RE: ACR 1, ACR2, Alaska Salmon Hatcheries Forum

Thank you for the opportunity to provide comment related to Alaska Salmon Hatchery production and the ACRs submitted for consideration at this October, 2018 work session. Kodiak Regional Aquaculture Association is opposed to ACR 1 submitted by Kenai River Sportfishing Association (KRSA) and ACR 2 submitted by Virgil Umphenour. In the simplest context, both requests fail to meet criteria established for ACR consideration and should not be entertained by the Board for discussion or action in future meetings. More specifically, contentions made by the proposers are weak against the broad body of evidence that can be brought to bear in support of established programs, permitting, and production levels.

As an association actively engaged in the practice of salmon enhancement and research, KRAA would also like to thank the Board for its renewed interest in the *Alaska Board of Fisheries and Alaska Department of Fish & Game Joint Protocol on Salmon Enhancement #2002-FB-215*. We feel that the years in which this protocol was not observed have led to a lack of knowledge and uncertainty in the science and principles that support Alaska Salmon Hatchery production. Renewed adherence to this protocol provides opportunity to become familiar with the science, research, and regulatory structure that governs the Alaska Salmon Hatchery Programs. Furthermore, through this format, there is opportunity to share with the Board, as well as the public, the details of our programs, research, and the ways in which they benefit all user groups.

The Board of Fish has scheduled an Alaska Salmon Hatchery Forum (item 16, Alaska Board of Fisheries Work Session agenda, rev. 09-28-2018) for discussion as part of the regularly scheduled October work session. As such, KRAA believes the language of the *Joint Protocol on Salmon Enhancement* does not provide for consideration of hatchery-related petitions or ACRs as action items during those meetings. The protocol states:

"The joint department-board meeting on hatchery [sic] described here will take place at a mutually agreeable time and place during regularly scheduled meetings of the board. The meetings will provide a forum for open discussion on a mutually agreeable agenda of hatchery topics. The agenda may include site-specific as well as regional or statewide hatchery issues. These salmon enhancement meetings will not be open for regulatory actions and no hatchery-related petitions or agenda change requests (ACRs) will be considered as action items."

Given this language and the scheduling of Alaska Salmon Hatchery Reports (item 15) as well as the Alaska Salmon Hatcheries Forum the day following ACR discussion, it would be premature to consider any action related to hatcheries prior to thorough engagement in the *Joint Protocol on Salmon Enhancement*.



Alaska's private, non-profit hatchery (PNP) associations are designed to serve the various regions of the state with programs uniquely tailored to complement and enhance existing production and benefit all user groups. The Alaska Hatchery Program was founded by visionary scientists at ADF&G and in the private sector who saw an opportunity to bolster the fishery with long-term salmon enhancement contributions. Those individuals applied their knowledge of hatchery programs in other areas of the country to create a program based on the precautionary approach and best available science. In the years since the creation of the PNP program by the Alaska Legislature, Hatchery Operators have continued to conduct those programs in cooperation with ADF&G, in good faith, and based on the tenets of the Department's guidance and policies—including the genetics policy and the policy for sustainable salmon fisheries. We see our role as stewards of the resource and contributors to our communities for the benefit of all users. As such, we do not often find ourselves pulled into the public center of battles over fish. The events of the last several months, the repeated demands by a small number of very vocal critics to the Board of Fish to take unfounded action to limit hatchery production, have forced PNP operators as well as the Board of Fisheries and countless stakeholders, to invest inordinate time and resources in what should be a non-issue.

Rather than create uncertainty in the defensibility of the Alaska Hatchery Program, the efforts of detractors have galvanized hatchery operators to take action, to make sure that the Board and the public understand the science of the programs and the benefits that accrue to all users as a result of hatchery production in Alaska. It has given us the opportunity to work together and with others to marshal the scientific information available, and work together to demonstrate both how critically important hatchery production can be to the fishery as well as how sustainable those contributions remain in a changing climate. In addition to the individual comments of myself and other PNP hatchery operators, I hope you will take note of the supplemental information provided by our groups.

The current ACRs generally imply that Alaska Hatchery Programs operate in an unregulated vacuum with irresponsible levels of production that have seen no checks or balances along the way. In fact, the established permitting process and authority delegated to ADF&G provides for rigorous scientific review and recommendations by professional biologists familiar with the programs, regulations, guiding policies and science on both a local and statewide scale. Though it has been implied by critics in recent months, the existing permitting process *does not* equate to a "rubber stamp" for permit requests. In each region there are examples of permit requests or projects that have failed to receive the recommendation of the Regional Planning Teams or that have been modified in response to application of the genetics policy and the policy for sustainable salmon fisheries. When the process is working properly, PNP hatchery operators work with their local ADF&G staff in order to assure requests for permit alteration are vetted in a manner that answers many of the basic concerns before the request is submitted. Added concerns can be voiced and taken into account through the public process, but it's often the case that many potential requests are discarded before they ever see the light of day because ADF&G staff can point to concerns related to genetics, protection of wild stocks, and provisions of the sustainable salmon policy. The process is comprehensive, transparent, efficient, and thorough.

The department's function as an objective scientific and regulatory body also provides opportunity to identify questions and information gaps related to hatchery production on a regional and statewide scale. The Hatchery-Wild Interaction study is a prime example of both the department's and the Alaska hatchery operators' commitment to inquiry and investigation of the questions surrounding possible impacts of straying. As with any long-term program or policy, what appear to be anomalous incidents and one-off sampling events should not be allowed to drive program management. Careful, unbiased inquiry, application of sound science in the consideration and development of programs, and adherence to established best practices represents both the current approach of ADF&G in regulating the Alaska Hatchery Program and the commitments of the hatchery operators.



Along with the commitment to sound science and research on hatchery topics, Alaska's PNP programs are dedicated to the communities and user groups they serve. Enhancement programs provide a measure of stability to the fisheries in each region, offsetting years of poor production and giving permit holders added opportunity in more abundant years. Opportunity on enhanced fish spreads out fishing effort and serves the purpose of reduced pressure on naturally spawning runs. In a given year, hatchery terminal areas and associated districts ideally give managers a place to direct permit holders and other users during closures, and hatchery operators often put the needs of those users first. For example, KRAA pink salmon production typically represents between 10% and 25% of the pink salmon harvest in the Kodiak Management Area. Following the disastrous impacts of the warm water "blob" in the Gulf of Alaska and the 2016 pink salmon failure, KRAA's Board of Directors made the decision to forego a pink salmon cost recovery fishery at Kitoi Bay Hatchery in 2018. With a higher than expected return to the facility and in the absence of a cost recovery fishery, KRAA put more than 3.2 million additional fish into the common property fishery. That figure, though not "massive" by any measure of the average pink salmon fishery, represents over 50% of the pink salmon harvest in the KMA in 2018. It could be the difference between breaking even and a disastrous year for many permit holders. This is the function for which the enhancement programs were designed. In 2018, Kodiak enhancement programs put over \$6.5 million in estimated ex-vessel value into the hands of permit holders in the KMA alone. Hatchery programs statewide made similar and even greater differences for the permit holders in other regions.

However, benefit to commercial permit holders, processors and crews are not the only purposes of the hatchery programs. In 2018 the local subsistence sockeye and sport coho system in Kodiak, the Buskin Lake and river system, has all but failed. At the same time, KRAA's sockeye stocking projects in Port Lions, and Ouzinkie, and the coho stocking project on the Kodiak Road System have provided numerous opportunities for sport and subsistence that directly benefit these local communities. Thousands of coho salmon in Mill Bay and Monashka Bay have been caught by everyone from anglers standing on the beach to stand-up paddle boarders, locals interested in filling their freezers, and professional sport fishing charter operators. These are the programs most likely to suffer the greatest impacts in the face of any restrictions, caps, or moratoriums on hatchery production, and I would again encourage you to refrain from entertaining any such restrictions when engagement in the *Joint Protocol on Salmon Enhancement* will do much to answer both the generalities and specifics of questions related to hatchery interactions and production levels.

Restrictions to hatchery production, caps or moratoriums on future production would not take into account the interests or needs of a region. Taking steps to implement such restrictions would be both needlessly punitive in the face of no demonstrated harm and no empirical evidence to suggest long term impacts. Further, restrictions now would likely have unintended negative consequences for the Associations and for all user groups. In closing, KRAA would repeat our opposition to ACR 1 and ACR 2 and provide specific points to address those proposals in the pages following. Finally, once again, we encourage interest and engagement in the *Joint Protocol on Salmon Enhancement* and look forward to sharing the success story of the state's salmon enhancement programs through that process.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Fairbanks".

Tina Fairbanks
Executive Director
Kodiak Regional Aquaculture Association

Submitted via email: dfg.bof.comments@alaska.gov



ACR 1: Prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017 (5 AAC 24.366). Submitted by Kenai River Sportfishing Association

PERMITTING:

- The permit increase in question was covered in-depth in comments submitted for the July Meeting related to the identical emergency petition submitted by the same proposer.
- The permit increase in question was approved as an incremental increase in 2014—more than 4 years ago. It underwent thorough review and consideration by ADF&G.
- The permit increase in question was not approved as originally submitted but was revised to the satisfaction of the Department and the Commissioner for implementation in 2018.
- Authority over hatchery permitting has been delegated to ADF&G since inception of the programs. The regulatory process for permitting is transparent, rigorous, and should stand.
- ADF&G maintains the staff and expertise to evaluate and permit hatchery operations, and added steps to permitting and regulatory oversight would be unnecessarily burdensome and inefficient.
- The ACR does not meet criteria for consideration. This is verified by ADF&G staff comments (RC2) in which they submit 1) there is no fishery conservation purpose; 2) no error in regulation is addressed; and 3) the ACR does not address an effect of a regulation that was unforeseen at the time the regulation was adopted.

STRAYING CONCERNS

- Concerns over straying are both integral to the assumptions and knowledge on which the programs were built (not unforeseen) and also in the process of intensive study through the Hatchery-Wild Interaction study (HWI). This effort addresses (c) (1) (D) of the Sustainable Salmon Policy to address interactions between wild and enhanced salmon.
- Protection of wild stocks: preliminary findings of the HWI indicate that harvest rate of hatchery returns of pink salmon to PWS from 2013-2015 ranged from 95-99% (including broodstock) while harvest of naturally spawning stocks ranged from 26-53% during those years (State of Alaska Hatchery Research Project, Progress Synopsis, June 2018). Given this information, management appears to have the ability to assure near-to-full capture of hatchery production (an intended benefit of the programs) and provide for the protection and robust escapement of local wild stocks.
- Region-wide pink salmon hatchery fractions in PWS from 2013-2015 were calculated as 4%, 15% and 10% respectively. The stray rate during those years was 1-5% (hatchery pink salmon that spawned naturally).
- Studies on natural stray rates for pink and chum salmon have generated estimates of 4-7% (Mortensen, et al, 2004) while others have provided estimates of 10% or greater (Small, et al, 2009; Wetheimer, et al, 2000 as well as other, earlier studies). These studies demonstrate natural stray rates equal to or in excess of those observed in PWS from 2013-2015.
- The locus of the straying concern cited by the proposer, Lower Cook Inlet, is centered on data that was opportunistically collected in 2017 and do not represent sampling distribution throughout the run. Baseline sampling has not been conducted in many of the 2017 sampling locations because it is rare for pink salmon to be present in those



locations. 2017 provided anomalous conditions that likely led to the high incidence of PWS fish.

FOOD COMPETITION/OCEAN CARRYING CAPACITY

- With regard to food competition concerns cited by the proposers, the large body of work collected and reviewed by the North Pacific Anadromous Fish Commission provides extensive information related to biomass of pink salmon in the North Pacific Ocean. Ruggerone, 2018, indicates that hatchery-produced pink salmon represent only 15% of the total pink salmon biomass in the North Pacific. Alaska's Hatchery programs produce only a portion of that percentage.
- To suggest that "massive releases" of Alaska Hatchery pink salmon, in competition with sockeye and King salmon for food resources, are suppressing returns of those other species is not a claim supported by empirical evidence. Sockeye and king salmon returns have varied in productivity independent of relatively consistent hatchery production from the early 1990s through the present.
- For a summary analysis of information, see "High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate" by Alex Wertheimer and William Heard as submitted with comments from NSRAA.

ACR 2: Cap statewide private non-profit salmon hatchery eggtake capacity at 75% of the level permitted in 2000 (5 AAC 40.XXX). Submitted by Virgil Umphenour

HISTORY/MERITS

- The ACR does not meet the criteria and makes no effort to do so in writing. There is no conservation issue conveyed or supported in this ACR. No regulatory issue or unforeseen regulatory effect on a fishery is identified.
- The ACR claims there was agreement to reduce hatchery production by 25% in February of 2001; however there appears to be no official record of a decision or direction to reduce or cap production.
- This ACR if accepted for consideration or if implemented is likely to have unintended negative consequences. As written, this ACR applies to all species and would likely have the greatest impacts on projects designed to have direct benefits to sport and subsistence users.

SPORT AND SUBSISTENCE IMPACTS

- KRAA's Subsistence and Sportfish production is provided at no cost to users. All costs are subsidized through Salmon Enhancement Tax collected from commercial salmon permit holders and through cost recover activities.
- Programs impacted:
 - Crescent Lake sockeye and coho stocking projects (subsistence and sport) with direct benefit to the village of Port Lions would likely cease—unsupportable with reduced production
 - Ouzinkie Sockeye saltwater net pen sockeye release and Katmai Lake coho stocking projects (subsistence and sport) would likely cease—not permitted in 2001
 - Telrod Cove sockeye saltwater net pens with benefit to the village of Larsen Bay (subsistence and commercial) would cease—not permitted in 2001



- King salmon product (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable
- Coho Salmon Production, Kodiak Road system (sportfish)—loss of production, not permitted in 2001
- Rainbow Trout (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable
- Kitoi Bay hatchery coho (sport and commercial benefit)—likely 45% reduction in returns
- Kitoi Bay Hatchery Sockeye production (subsistence and commercial)—reduction in production, potential loss of program

COMMERCIAL IMPACTS

- Impacts to production of pink, chum, and sockeye salmon: Overall potential loss of over \$5 million annually in ex-vessel value
 - Pink salmon releases would decrease by over 35%, and, on average, the fishery would lose nearly 3 million fish on an annual basis.
 - At 2018 prices, that would constitute a potential **loss of \$3.5 million in ex-vessel value** to the common property fishery annually
 - Chum salmon releases would decrease by over 30%, and, on average, the fishery would lose as many as 200,000 fish on an annual basis
 - At 2018 prices, that would constitute a potential **loss of \$714,000 in ex-vessel value** to the common property fishery annually
 - Reductions in sockeye salmon production at Kitoi Bay and Pillar Creek Hatcheries would result in potential loss of over 150,000 adult sockeye salmon per year
 - At 2018 prices, that would constitute a potential **loss of over \$1 million in ex-vessel value** to the common property fishery annually

ECONOMIC/ORGANIZATIONAL IMPACTS

- Enhancement provides stability and opportunity to the fishery; Supports reliable processing capacity and processing sector jobs as well as other support industries
- Generate added income for municipalities and local governments through landing tax on enhanced harvest
- Direct and indirect employment: KRAA employs 40-45 individuals per year with total payroll in excess of \$1.8 million annually. This likely equates to effects on over 400 local jobs.
- Reductions in production would likely mean loss of 8-12 positions (5 year-round, 3-7 seasonal positions) for KRAA
- Reduced production would decrease cost-benefit of programs. Many may become unsupportable.
- KRAA spends over \$1 million annually with local vendors and Alaskan companies
- Even with organizational cuts and efficiencies, cost recovery activities would consume a greater proportion of the returns and benefit to users.



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October 8, 2019

Alaska Board of Fisheries
Reed Morisky, Chair
Attn: Glen Haight, Executive Director
1255 W 8th Street
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Morisky and members of the Board of Fisheries,

KRAA opposes ACR 2 and would urge the Board to take no action on the proposal at your work session. This ACR fails to meet the Board's criteria, and is simply the latest in a series of proposals representing the opinion of a small but strident minority which has brought hatchery operators and countless stakeholders to nearly every meeting of the Board for over a year and a half. We contend that with the exception of the reinstatement of the Joint Board Protocol on Salmon Enhancement #2002-FB-215, these proposals have placed an unnecessary workload and drain on both the Board and stakeholders.

Conserve the Board's Time and Resources:

The Board should limit the ability of a single person to continually request the same types of Board action, out of cycle, and thereby cost the Board and stakeholders valuable time and resources. The author of this ACR has not been satisfied with the Board's decisions in the past and somehow believes that restating the same arguments, often half-truths and misleading restatement of policy, over and over again will eventually result in a different outcome. The Board should not reward this type of behavior. In this case, as in others, the information provided often reflects the opinions of the author. Hatchery operators, by contrast, have made every effort to provide the Board with a factual narrative based on sound science as counterpoint to the author's claims.

KRAA believes that the author's interest in ACR 2 is not really about West Crawfish Inlet but rather it is an interest in eliminating Alaska's entire hatchery program. Through the vehicle of the West Crawfish Inlet discussion, the author appears to be advocating that the Board implement sweeping statutory, regulatory, and policy changes for all enhancement programs in the State of Alaska. We contend that the authority to make these types of programmatic adjustments or changes to the current hatchery programs lies properly with ADF&G under the authority of the Commissioner.

Board's Prior Decision Making:

KRAA would encourage the Board to reference your recent actions and presentations at the Joint Protocol on Salmon Enhancement Hatchery Committee Meeting and your March Statewide Board meeting. Several proposals related to hatcheries were before the Board between February of last year and the



present. After extensive technical presentations, public testimony and robust Board discussion, the Board affirmed the Joint Protocol on Salmon Enhancement #2002-FB-215 and has scheduled another Hatchery Committee Meeting for March of 2020. The Board further committed to gaining better understanding of the enhancement programs and the programmatic standards before making regulatory changes.

ACR 2 Fails Acceptance Criteria

1. First and foremost, ACR 2 fails to meet the Board's criteria for acceptance as a Conservation Concern

Despite the rhetoric in ACR 2 there is not a conservation concern. The author cites genetics, disease, and ecosystem impacts as the basis for a conservation emergency. The genetics argument falls short when we consider that the project was designed to utilize a broodstock with different run timing than the West Crawfish stock. In so doing, the genetic integrity of the native stock is preserved, overlap between the enhanced stock and the wild stock is limited, and concerns related to potential introgression have been mitigated—maintaining wildstock priority in concept and in execution.

Straying in-and-of its self is not a conservation concern. The hatchery program, at its inception, acknowledged that all species of salmon stray to some degree. Some studies on natural stray rates for pink and chum salmon have generated estimates of 4-7% (Mortensen, et al, 2004) while others have provided estimates of 10% or greater (Small, et al, 2009; Wetheimer, et al, 2000 as well as other, earlier, studies). The author makes much of high stray *proportions* in West Crawfish in September and October but fails to reveal both the number of fish those stray proportions represent and that the naturally spawning stock is primarily present during July and early August, not September and October. Furthermore, in one of the few instances in which the author offers a citation (Withler, 1997), there is no mention that this particular paper was strictly about Coho salmon in the Pacific Northwest. Coho and chum salmon have very different life histories and differing inherent stray rates. In this instance, we are talking about vastly different population sizes as well. Additionally, it's important to recall that stray proportion and stray rate are two very different things. A relatively small sample size during a limited time period could easily result in a high stray proportion for that time period and still represent a very low percentage of the total spawners in a system and an even smaller fraction of the total adult return related to the enhancement project (stray rate).

Disease could be a conservation concern but it is not factually supported by the long term data set or any existing evidence of disease introduced in this population. Here, too, the author leaps from one species to another attempting to conflate Bacterial Kidney Disease (BKD) in Coho salmon (which is relatively common to that species) with transfer by hatchery-produced chum salmon (in which BKD is not common) to a naturally spawning chum population. In fact, verified information from the Department, presented to the Board in March, 2019, is clear: background levels of disease in naturally spawning salmonid populations in Alaska have not had observable increase since the inception of the enhancement programs.

Finally, the author's claim that ecosystem impacts create a conservation concern based on feeding rates is confounding. Returning adult salmon cease to feed as they prepare to spawn and then die and thus are unlikely to have any impacts on locally rearing fish at the time of return. If the author of this ACR was



attempting to make an argument related to the release and feeding of juvenile salmon in Crawfish Inlet, the argument was neither clearly made nor supported. The long term evidence of continued high productivity, and even record returns, of wildstocks in the decades-long presence of robust enhancement programs speaks for itself.

2. Error in Regulation

ACR 2 fails to establish that there is an error in regulation. The author's extensive Regional Planning Team discussion relative to regulation error doesn't make sense. Regional Planning Teams do not have regulatory authority.ⁱ

3. Unforeseen Effect on a Fishery

With the RPT process and subsequent monitoring, it is unlikely that there would be an "unforeseen effect" on the fishery that could justify acceptance of an ACR. Moreover, ACR 2 doesn't come close to meeting the bar. Further, it's important to note that in response to observed straying in West Crawfish Inlet, NSRAA and ADF&G have coordinated to utilize existing regulatory framework and Management authority to more effectively harvest late-returning chum salmon associated with the Crawfish Inlet chum release. This is yet another example of how the permitting and regulatory processes exist to preserve wildstock priority. The author asserts that a loss of productivity could, perhaps, have a potential future impact on a fishery. The author then fails to demonstrate that hatchery programs in general, or this project in particular, have resulted in reduced wild stock productivity in hatchery-associated areas or in the system in West Crawfish. Again, the Board must consider the facts as they are, not as a specific advocate would like them to be.

In summary, because ACR 2 does not meet the Boards established allocation criteria and is outside of the Board's direction and intent regarding hatcheries as indicated during the Board's March 2019 meeting, the Alaska Board of Fisheries should take no action on ACR 2 at your October, 2019 work session.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Tina M Fairbanks".

Tina Fairbanks,
KRAA Executive Director

ⁱ It may be necessary to set the record straight on a number of points regarding Regional Planning Teams (RPT's).

- The Regional Planning Teams (RPTs) are not "dominated" by the aquaculture associations but have equal and often strong Department of Fish and Game representation. These bodies do NOT "authorize permits and make the decisions" regarding enhancement projects within the regions. In fact, the RPTs only make recommendations related to those projects. Decisions and permit approval are the sole authority of the Commissioner of ADF&G.



-
- To assert that projects are permitted without rigorous review is also false. The permitting process for a new project is extensive. A project will spend a year or more and often several years under discussion. Frequently, the initial plan/permit request is rejected while the Department and aquaculture association formulate and refine different iterations until agreement is reached.
 - Once the permit request is submitted the process continues through various divisions within ADF&G including Pathology, Genetics, Management, Research, and Sportfish. The Department reviews the proposed project for compliance with the Genetics and Sustainable Salmon Fisheries Policy, at a minimum. A project that does not meet the bar of those policies is NOT permitted.
 - Many potential projects never make it to the permitting stage because in-region talks between the Department and the aquaculture associations reveal insurmountable challenges to the project. Always, the precautionary approach utilizing statute, regulation, and policy is exercised to assure a wild stock priority.
 - At the RPT level, a tie vote fails, and the Commissioner will be notified that the RPT cannot support a recommendation to approve the requested permit.
 - To contend that this process, and the public meetings that surround each and every proposed project by an aquaculture association, lacks proper consideration of wild stocks or conservation issues is simply false.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 and subsistence salmon fisheries of the Prince William Sound Region.

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.

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

Sincerely,

Kondra Kuzmin
kondrakuzmin@yahoo.com
(907) 399-2181

From: Kory Blake
P.O. Box 1122
Cordova, AK 99574



PC137
1 of 7

History: Born in Cordova still living in Cordova
Copper River fishery 50 years
Seined PWS Captain 27 years Crewed 10 years

Concern: 2020 Copper River fishery.

We were shut down from 6/18/20 to 7/6/20. Then again 7/7/20 to 7/16/20 18 stait days and another 9 days.

This is the run timing for Gulkana Hatchery 6/20 Thru 7/20. If we didnt ~~catch~~ fish where did the fish go! They never got to the Hatchery for the last five years! This fact alone should tell the Board that theres a lot of overfishing going on upriver! Look at 2020 Sonar count run timing.

In 2021 you can see we were shut down during our early peak season 5/25/21 to 6/9/21. 15 days without an opener. During the closure we overexcaped 100,000 plus fish. Then again ~~6~~ 6/25 to 7/21/21 Gulkana run timing 60,000 to 100,000 fish, while we were fishing. Point still no brood stock for Gulkana Hatchery. Where did they GO?



The gillnet fleet has had Inside Waters closed in 2020 till the 6th of July and in 2021 till the 5th of July

History: We used to fish All waters inside ~~the~~ early 1900's till mid 1980's. Monday 6 AM to Wed 6 AM! then Thursday 6 PM till Saturday 6 AM. We used to fish King gear also during this time. We lost King Gear for conservation. We lost Inside openers " " We lost Time for conservation

Now we only fish on the Bars or Outside the bars, With less time & No King Gear!

Maybe let some fish go by the fishwheels. Maybe for conservation only ~~to~~ operate fish wheels 6 AM Friday till 7 PM Sunday! They shut down Yukon fishwheels, WHY? Maybe restrict a new fishery: Dipnetting by Boats to Monday 6 AM to Thursday 6 PM, so not to conflict with fish wheels.

State should shut down time and area for Draggers/Trawlers. They are catching more King Salmon than All of State catch. They are making it bad for All State fisheries Subsistence Sport and Drift fleets. Look at the Yukon, Kenai, King returns.

State mandate is not reallocate fish.
But in last 40 years the gillnet fleet
has lost time / Area / Net restrictions.

While other users have Increased
opportunities Dip nets size increase,
Leasing fishwheels.

State should ban all bait for Sport
Chinook and Coho Salmon !

Restricting fisherys upriver on Mondays
Thru Thursdays is not a restriction.

7PM Thursday thru Sunday 7 Pm I would
consider a restriction for upriver users.

The gillnet fleet should never get shut
down for more than 3 or 4 days during
any peak run timing. We cant catch
them once they go in the Bars. This
cost the fleet millions in revenue. We
loss markets and revenue for State,
Citys and fleet.

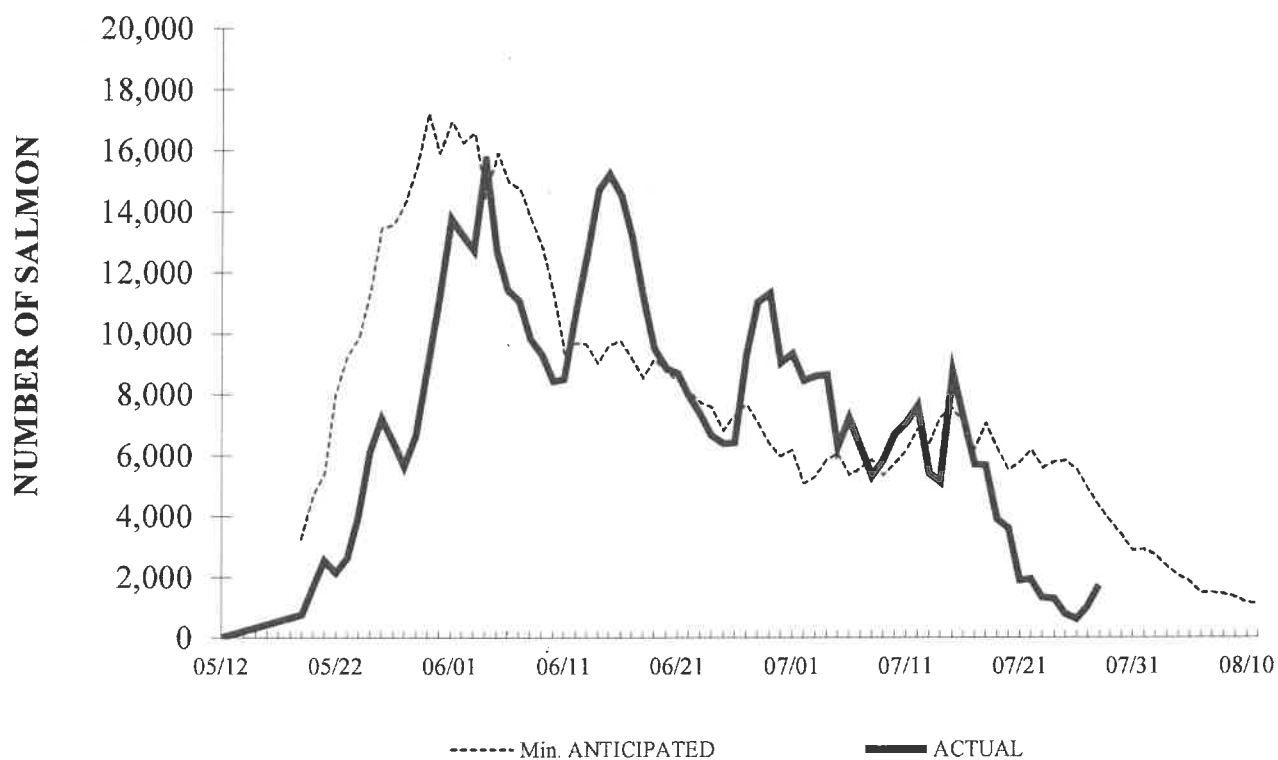
Page 6 is support of proposals

Page 7 is oppose of proposals

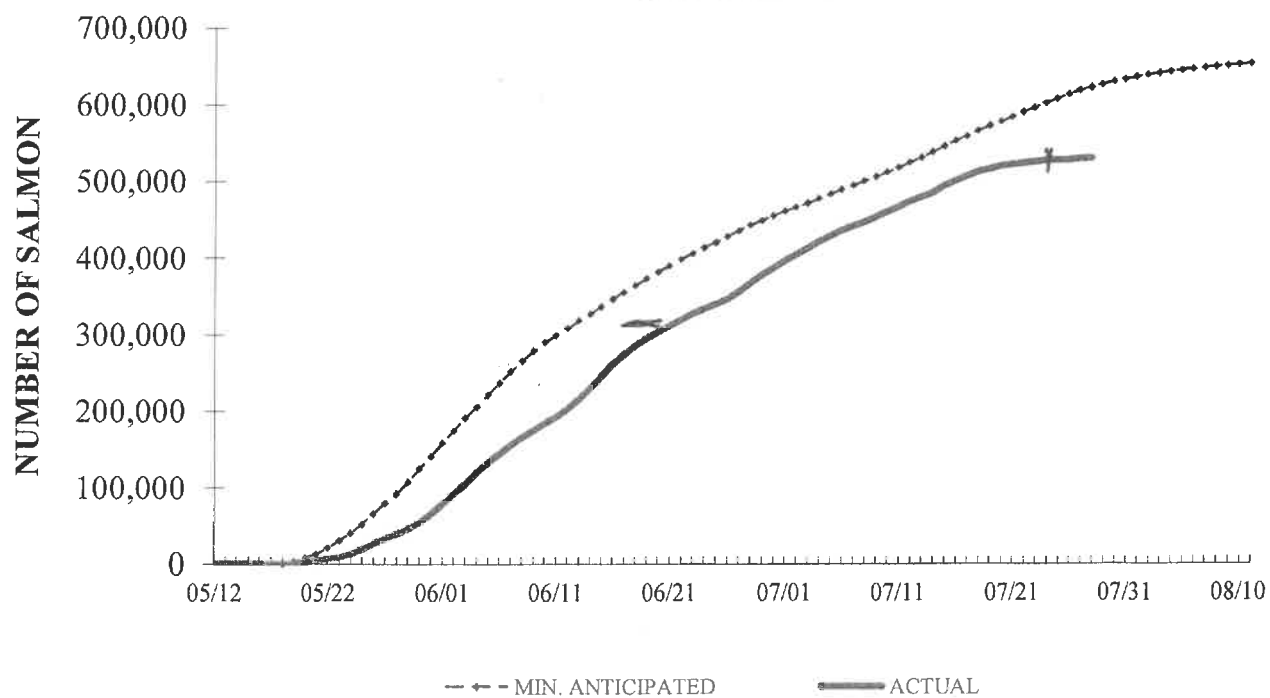


2020 MILES LAKE SONAR COUNTS

DAILY



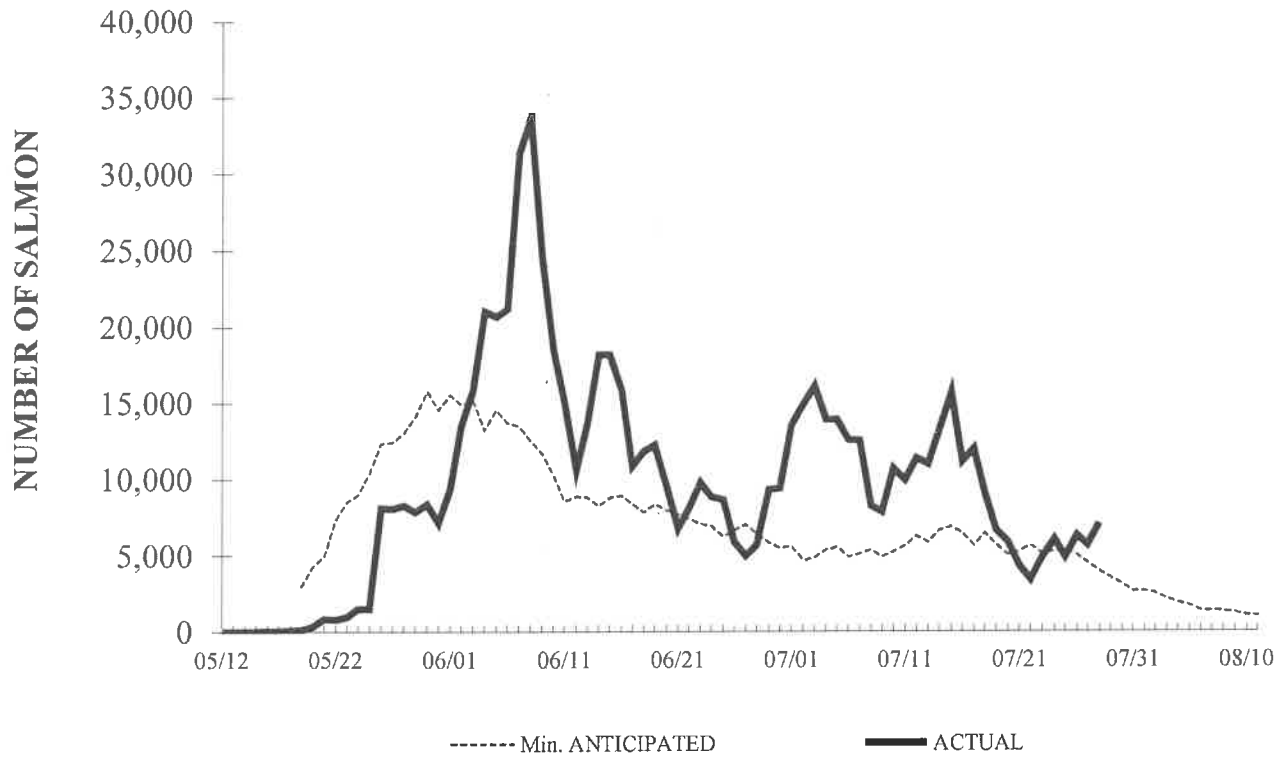
CUMULATIVE



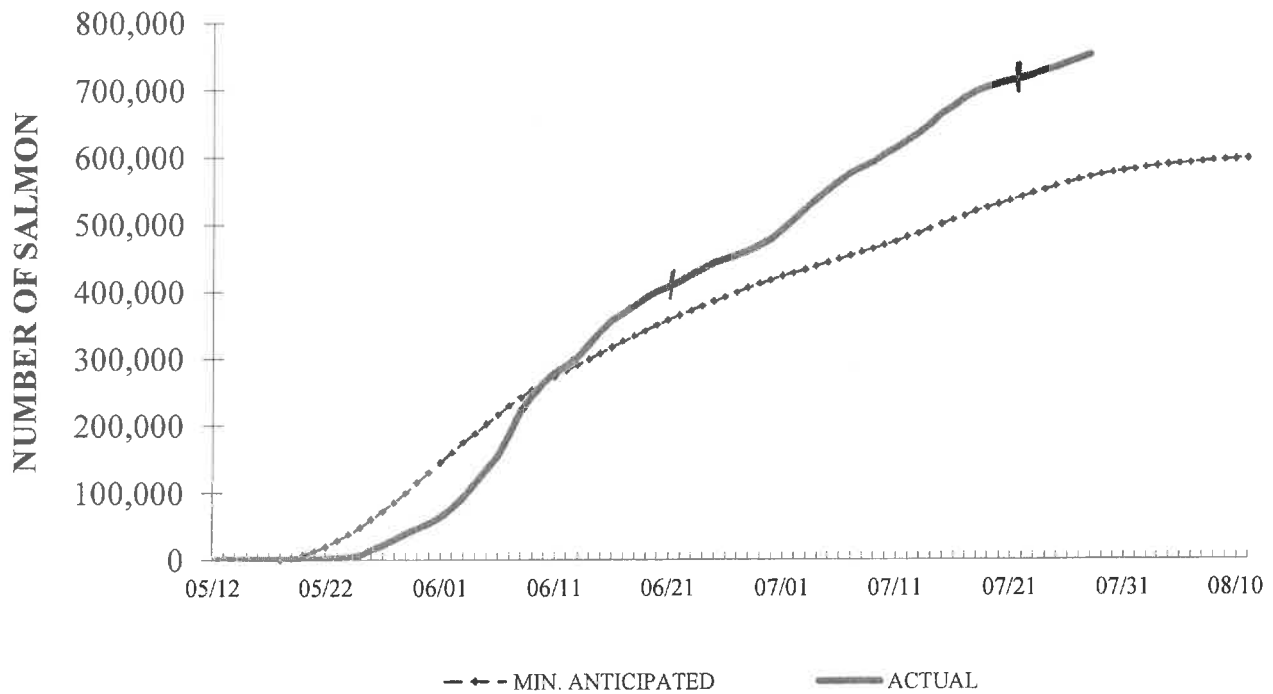


2021 MILES LAKE SONAR COUNTS

DAILY



CUMULATIVE





Im in Support of the following proposals.

- # 1 skate fishery
- # 6 for the health of resource
- # 7.
- # 8 for the health of resource
- # 9 to 11 Support Conservation of resource
- # 14 Conservation of Chinook resource
- # 15
- # 19 All share in low abundance
- # 20 Strongly support
- # 38 " "
- # 39 Support
- # 40 Strongly support
- # 42 even playing field
- # 43 would only be fair
- # 44 " " "
- # 46 Support
- # 59 "
- # 61 and 62 Support
- # 63 thru 67 Support
- # 69 Thru 72 Support.



I oppose the following proposals

5 AAC 24.361 ~~limiting~~ spawning greater than
21,000 to 31,000 max

- # 18 Will interfere with NVE study
- # 21 gillnet fleet has closures upriver needs closures
- # 27 Strongly oppose
- # 28 not very clear
- # 29 gear conflicts with cost recovery
- # 31 we are not the Kenai
- # 45 would limit drift fleet even more
- # 47 No truth to this
- # 48 oppose Intercepting Sockeye going to Main Bay
- # 49 Strongly oppose
- # 54 55 Strongly oppose
- # 50 51 52 53 Strongly oppose
- # 56 oppose
- # 57 oppose
- # 58 would intercept more sockeye going to
main bay Allocative

Thank you for your time

Kory Blake

Submitted By
Kyle Shedd
Submitted On
11/6/2021 9:11:55 AM
Affiliation



PC138
1 of 1

Phone
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7241 Huffman Road
Anchorage, Alaska 99516

Support for Proposal 27

As a participant in the Copper River subsistence fishery, I have appreciated the addition of subsistence openers on Saturdays that was adopted at the 2017 board meeting. Prior to that, subsistence users were forced to compete with commercial fishermen during regularly scheduled commercial openers. Given the vast disparity in fishing power between a commercial fishermen and subsistence users, it was often challenging to catch enough fish for the year in one or two periods of fishing. Being able to fish on Saturdays has also opened up access to subsistence users that are unable to fish during commercial openers that typically take place during the work week...as long as the weather was good, the tides were right, and there wasn't a 48 hour commercial period that just took place from Thursday morning until Saturday morning that had cleaned out almost all the fish in the district.

Proof that there was need for additional subsistence opportunity in the Copper River District is evident from the increase in both subsistence harvest and fished permits in 2018 and 2019 (avg. 7,021 salmon and 392 permits; data from RC 2 Table 27-1) after the addition of Saturday subsistence openers compared to the previous 9 year averages from 2009-2017 (avg. 2,793 salmon. and 161 permits). A similar increase in subsistence harvest and participation was also seen in the Prince William Sound general area subsistence fishery (2018-2019 avg. 293 salmon and 12 fished permits vs. 2009-2017 avg. 37 salmon and 4 fished permits; data from RC 2 Table 27-2).

Further evidence of the need for increased subsistence access is the fact that not once in the past 11 years have either of the villages of Tatitlek or Chenaga been able to harvest enough salmon to meet the lower bound of the amounts reasonably necessary for subsistence (ANS; data from RC 2 Table 27-3)!

Despite the increase in subsistence harvest in the Copper River and PWS subsistence fisheries, the overall harvest is fairly low (<10,000 salmon / year) and remains lower than commercial homepack (data from RC 2 Table 27-4), so there are no serious conservation concerns with increasing access to subsistence users.

In summary, this proposal would increase access to subsistence users, who under state law should have the highest priority when a harvestable surplus is available. There are few legitimate conservation concerns given the relatively small amount of subsistence harvest compared to commercial homepack, let alone commercial harvest. The board should adopt this common sense proposal.

Sincerely,

Kyle

Submitted By
Laine Welch
Submitted On
11/4/2021 11:28:09 AM
Affiliation
media



PC139
1 of 1

Phone
9074862391
Email
msfish@alaskan.com
Address
315
High Street
KODIAK, Alaska 99615

In my 30+ years of covering the Alaska "fish beat" I am well aware of how important the contribution of hatchery salmon is to commercial fishermen around the state. At times of low salmon returns, hatchery fish help sustain Alaska's fishermen and communities. They also provide for sport, personal use and subsistence users - at no cost to the state.

I urge the Board of Fisheries to remain as strong advocates for Alaska's hatchery program and vote against Proposals 49-55 that aim to curtail production at Prince William Sound.



Alaska Department of Fish and Game

PC140
1 of 1[ADF&G Home](#) » [Regulations](#) » [Process](#)

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* Indicates a required field

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

Name * *Lee R. Adler* Affiliation

Contact Phone * *907-922-3166* Email * *Adleralaska@gmail.com*

Address Line 1 * *Box 285 Glennallen, AK 99588*

Address Line 2

City * *Glennallen*

State * *AK* - *99588* ✓ Zip *

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

Yes ☒ No ☐

Comment *

Format

I have lived in Glennallen since 1969, and worked as a Wildlife Biologist and other things. Up until about 10 years ago grayling were plentiful in Moose Cr. Then after several years of over harvest during the spawing, they declined. In the past 4 years it has been a waste of time to fish for them. They need protection in order for a come back.

body p

Words: 0 (Limit: 5000)

I agree with the proposal to restrict to catch & release from April 1 to May 30.

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!

Lee R. Adler
11-27-20



Alaska Board of Fish Members



My name is Leroy L Cabana

My comment is on proposal 43

I am against proposal 43 for the following reasons, The PWS Allocation plan was adopted after years of meetings and full input from all user groups. The basis for the allocation plan to only allocate PWSAC hatchery produced salmon in the plan is simple and effective. The intent is to keep the PWSAC hatchery salmon allocated by specific percentages with access to fishing in Chalmers, Wally Noernberg , Main Bay, Cannery Creek, Armin Koernig and Gulkana for the set gillnet, drift gillnet and purse seine fishermen balanced on the long term harvest history that existed prior to hatchery production.

When the allocation plan was finalized in 2005 it included clear language that acknowledged the Allocation plan would only include PWSAC production as the wild sockeye production on the Copper River basically balanced out the wild pink and VFDA hatchery harvest values. There were long and informative discussions about adding all salmon harvest values to the PWS Salmon Allocation Plan and it was decided the salmon harvested outside of PWSAC production would likely balance out in the long term.

The attached salmon harvest pages clearly show the total value to each gear group from 1984 through 2019. These numbers are from the harvest values provided by Shellene Hutter at ADFG in Juneau. ADFG did not have prior years to 1984 digitalized from the COAR report. Looking at the total harvest values between the purse seine fleet and the drift gillnet fleet you will see there is \$ 1,102,754,454.12 from 1984 through 2019 for the drift gillnet fleet and \$ 1,024,499,348.71 for the purse seine fleet. This is a 78 plus million dollar advantage for the drift gillnet fleet for the years 1984 through 2019. These numbers represent the **TOTAL** value of salmon harvested from both fleets, it includes PWSAC, all wild stocks and VFDA. In summery, if someone tried to accomplish a long term equitable balance for the purse seine fleet and the drift gillnet fleet this was accomplished. There is no financial justification to change the Prince William Sound Salmon Allocation Plan. Both PWSAC and all other salmon harvest values have managed to balance themselves out for the last 34 years.

This proposal has been submitted for the last two board of fish PWS cycles. Both times it failed 7 to 0.

The drift gillnet fleet has been considerably ahead of the purse seine fleet in total harvest value in PWS for all salmon for years.

PWS 1984 - 2019 EXVESSEL VALUE\$ ANALYSIS DRIFT GILLNET												
YEAR	CHINOOK	%	CHUM	%	COHO	%	PINK	%	SOCKEYE	%	YRLY TOTAL	%
1984	\$1,541,171.00	99.4%	\$1,264,478.00	42.9%	\$5,350,015.00	95.7%	\$2,032,442.00	10.8%	\$7,862,220.00	88.9%	\$18,050,326.00	47.8%
1985	\$1,767,580.00	99.9%	\$952,837.00	26.1%	\$8,737,982.00	98.9%	\$367,507.00	2.0%	\$10,529,684.00	87.2%	\$22,355,590.00	50.4%
1986	\$1,427,673.00	99.5%	\$1,442,445.00	32.8%	\$3,946,684.00	97.7%	\$1,007,549.00	11.5%	\$11,498,983.00	89.3%	\$19,323,334.00	61.4%
1987	\$2,357,001.00	99.7%	\$961,662.00	14.7%	\$1,357,559.00	90.1%	\$2,280,690.00	5.7%	\$18,441,981.00	89.7%	\$25,398,893.00	35.8%
1988	\$2,721,660.00	99.6%	\$5,665,224.00	36.1%	\$8,697,590.00	95.4%	\$5,059,171.00	17.2%	\$13,695,633.00	97.0%	\$35,839,278.00	50.4%
1989	\$1,880,617.00	99.0%	\$625,646.00	20.2%	\$1,766,650.00	82.9%	\$628,204.00	3.3%	\$18,095,271.00	99.4%	\$22,996,388.00	51.7%
1990	\$1,269,631.00	99.8%	\$4,233,372.00	72.3%	\$3,776,036.00	84.6%	\$2,585,035.00	8.0%	\$11,899,796.00	98.0%	\$23,763,870.00	42.5%
1991	\$1,047,971.00	99.8%	\$1,654,004.00	94.7%	\$3,675,684.00	98.4%	\$248,124.00	2.9%	\$11,773,066.00	99.1%	\$18,398,849.00	68.1%
1992	\$2,702,232.00	99.9%	\$1,226,288.00	89.9%	\$4,391,851.00	94.9%	\$735,292.00	21.0%	\$19,581,734.00	97.6%	\$28,637,397.00	88.8%
1993	\$1,063,103.00	100.0%	\$2,925,899.00	99.2%	\$2,788,823.00	99.3%	\$165,885.00	10.2%	\$12,500,061.00	98.8%	\$19,443,771.00	92.1%
1994	\$1,537,528.00	99.9%	\$2,666,528.00	94.0%	\$7,208,605.00	96.7%	\$301,562.00	2.0%	\$9,922,158.00	94.5%	\$21,636,381.00	58.2%
1995	\$3,050,954.00	100.0%	\$1,429,921.00	88.7%	\$3,176,270.00	90.9%	\$1,015,251.00	11.6%	\$11,950,317.00	98.4%	\$20,622,713.00	70.9%
1996	\$1,881,726.00	93.0%	\$797,882.00	71.0%	\$1,218,718.00	76.9%	\$192,520.00	4.4%	\$18,569,487.00	92.4%	\$22,660,333.00	77.4%
1997	\$2,451,215.00	99.8%	\$2,245,089.00	54.0%	\$123,335.00	32.4%	\$207,157.00	2.8%	\$23,250,362.00	97.4%	\$28,277,158.00	73.8%
1998	\$3,817,545.00	99.9%	\$1,521,196.00	66.0%	\$705,803.00	84.4%	\$668,211.00	6.3%	\$14,390,937.00	99.2%	\$21,103,692.00	65.8%
1999	\$4,848,226.00	85.8%	\$2,012,092.00	50.6%	\$817,400.00	66.3%	\$1,979,592.00	14.1%	\$19,602,817.00	88.3%	\$29,260,127.00	62.1%
2000	\$2,273,294.00	90.0%	\$2,752,388.00	37.0%	\$2,092,274.00	64.1%	\$227,881.00	1.7%	\$13,542,355.00	93.3%	\$20,888,192.00	50.9%
2001	\$2,784,419.00	99.7%	\$2,830,134.00	47.6%	\$834,262.00	74.3%	\$122,849.00	1.5%	\$12,301,780.00	87.2%	\$18,873,444.00	59.1%
2002	\$2,806,768.00	99.9%	\$2,290,746.00	48.7%	\$2,096,245.00	96.7%	\$27,752.00	1.1%	\$15,100,652.00	98.9%	\$22,322,163.00	81.0%
2003	\$3,735,828.17	100.0%	\$915,959.72	35.2%	\$1,733,710.61	88.0%	\$56,337.30	0.6%	\$14,880,270.23	91.6%	\$21,322,106.03	62.2%
2004	\$3,533,773.57	100.0%	\$1,013,464.62	42.2%	\$3,773,914.34	96.2%	\$120,488.93	2.7%	\$13,174,540.79	97.8%	\$21,616,182.25	77.7%
2005	\$3,452,644.97	99.9%	\$1,900,334.52	64.4%	\$2,427,360.24	82.1%	\$60,293.00	0.4%	\$16,143,038.39	95.1%	\$23,983,671.12	55.9%
2006	\$3,087,345.04	99.8%	\$891,448.88	22.2%	\$3,926,923.08	73.1%	\$60,704.09	0.9%	\$19,390,939.99	95.4%	\$27,357,361.08	69.3%
2007	\$3,919,437.32	99.8%	\$2,625,471.61	48.2%	\$1,518,044.93	70.4%	\$89,961.08	0.3%	\$27,388,669.94	95.9%	\$35,541,584.88	49.3%
2008	\$1,494,510.43	99.8%	\$11,391,502.01	58.8%	\$4,113,778.10	66.7%	\$1,181,565.93	2.8%	\$12,027,784.87	89.3%	\$30,209,141.34	36.3%
2009	\$1,039,994.54	99.8%	\$9,614,385.01	87.9%	\$3,177,535.85	92.6%	\$344,418.87	3.8%	\$19,365,135.13	92.6%	\$33,541,469.40	73.9%
2010	\$1,053,029.95	99.1%	\$18,472,061.45	92.9%	\$3,537,131.77	98.5%	\$4,470,714.95	5.0%	\$21,850,060.47	88.8%	\$49,382,998.59	35.4%
2011	\$2,165,209.10	99.7%	\$8,693,077.29	91.1%	\$2,045,358.36	78.0%	\$1,016,182.69	2.8%	\$37,093,257.69	93.7%	\$51,013,085.13	56.2%
2012	\$1,683,187.34	90.3%	\$14,795,400.78	85.5%	\$2,014,289.35	94.1%	\$1,749,734.98	3.8%	\$41,720,828.61	91.7%	\$61,963,441.06	54.9%
2013	\$1,124,186.20	98.1%	\$12,865,040.76	84.6%	\$4,227,642.63	69.9%	\$2,597,348.35	2.6%	\$32,154,242.17	92.6%	\$52,968,460.11	33.9%
2014	\$1,207,221.56	98.7%	\$3,838,261.86	66.7%	\$4,766,675.99	89.3%	\$1,521,493.46	4.1%	\$43,735,929.55	94.8%	\$55,069,582.42	57.5%
2015	\$2,265,307.31	99.5%	\$3,842,522.42	74.2%	\$1,040,907.37	92.4%	\$735,275.69	1.1%	\$29,639,788.44	86.3%	\$37,523,801.23	34.8%
2016	\$1,369,061.91	99.7%	\$7,187,409.99	79.0%	\$6,224,251.69	97.2%	\$107,650.02	0.9%	\$21,846,323.29	90.2%	\$36,734,696.90	68.4%
2017	\$2,162,706.99	99.8%	\$13,812,058.32	54.6%	\$5,773,263.62	90.0%	\$1,140,383.67	1.8%	\$18,400,792.48	86.6%	\$41,289,205.08	34.5%
2018	\$1,688,515.93	99.5%	\$14,752,650.72	65.7%	\$6,323,335.77	88.9%	\$877,537.50	2.7%	\$12,512,094.15	83.3%	\$36,154,134.07	45.7%
2019	\$3,069,076.05	99.9%	\$9,099,148.65	69.2%	\$2,578,673.20	49.3%	\$797,590.74	1.7%	\$31,687,145.79	89.2%	\$47,231,634.43	45.5%
TOTALS	\$81,281,350.38	98.1%	\$175,208,029.61	64.2%	\$121,964,582.90	86.9%	\$36,780,355.25	4.0%	\$687,520,135.98	92.7%	\$1,102,754,454.12	51.2%

PWS 1984 - 2019 EXVESSEL VALUE\$ ANALYSIS PURSE SEINE												
YEAR	CHINOOK	%	CHUM	%	COHO	%	PINK	%	SOCKEYE	%	YRLY TOTAL	%
1984	\$9,248.00	0.6%	\$1,680,831.00	57.1%	\$237,832.00	4.3%	\$16,761,083.00	89.2%	\$985,292.00	11.1%	\$19,674,286.00	52.2%
1985	\$2,520.00	0.1%	\$2,703,425.00	73.9%	\$100,564.00	1.1%	\$17,690,309.00	98.0%	\$1,542,189.00	12.8%	\$22,039,007.00	49.6%
1986	\$7,833.00	0.5%	\$2,961,831.00	67.2%	\$94,165.00	2.3%	\$7,724,386.00	88.5%	\$1,378,230.00	10.7%	\$12,166,445.00	38.6%
1987	\$7,049.00	0.3%	\$5,601,190.00	85.3%	\$148,857.00	9.9%	\$37,641,274.00	94.3%	\$2,109,733.00	10.3%	\$45,508,103.00	64.2%
1988	\$11,137.00	0.4%	\$10,019,868.00	63.9%	\$421,951.00	4.6%	\$24,390,556.00	82.8%	\$426,979.00	3.0%	\$35,270,491.00	49.6%
1989	\$19,569.00	1.0%	\$2,477,541.00	79.8%	\$365,398.00	17.1%	\$18,514,106.00	96.7%	\$111,017.00	0.6%	\$21,487,631.00	48.3%
1990	\$2,251.00	0.2%	\$1,622,655.00	27.7%	\$689,950.00	15.4%	\$29,584,493.00	92.0%	\$245,072.00	2.0%	\$32,144,421.00	57.5%
1991	\$1,754.00	0.2%	\$91,667.00	5.3%	\$58,483.00	1.6%	\$8,354,142.00	97.1%	\$103,651.00	0.9%	\$8,609,697.00	31.9%
1992	\$3,392.00	0.1%	\$138,048.00	10.1%	\$236,668.00	5.1%	\$2,765,763.00	79.0%	\$475,924.00	2.4%	\$3,619,795.00	11.2%
1993	\$391.00	0.0%	\$22,992.00	0.8%	\$19,363.00	0.7%	\$1,463,615.00	89.8%	\$155,980.00	1.2%	\$1,662,341.00	7.9%
1994	\$1,061.00	0.1%	\$168,719.00	6.0%	\$247,698.00	3.3%	\$14,540,953.00	98.0%	\$577,230.00	5.5%	\$15,535,661.00	41.8%
1995	\$1,279.00	0.0%	\$182,158.00	11.3%	\$316,464.00	9.1%	\$7,760,003.00	88.4%	\$196,613.00	1.6%	\$8,456,517.00	29.1%
1996	\$142,287.00	7.0%	\$326,025.00	29.0%	\$366,938.00	23.1%	\$4,226,742.00	95.6%	\$1,537,398.00	7.6%	\$6,599,390.00	22.6%
1997	\$3,955.00	0.2%	\$1,913,511.00	46.0%	\$257,157.00	67.6%	\$7,256,099.00	97.2%	\$620,114.00	2.6%	\$10,050,836.00	26.2%
1998	\$4,089.00	0.1%	\$783,629.00	34.0%	\$130,745.00	15.6%	\$9,955,526.00	93.7%	\$118,090.00	0.8%	\$10,992,079.00	34.2%
1999	\$803,237.00	14.2%	\$1,964,281.00	49.4%	\$415,215.00	33.7%	\$12,080,373.00	85.9%	\$2,606,438.00	11.7%	\$17,869,544.00	37.9%
2000	\$252,769.00	10.0%	\$4,693,604.00	63.0%	\$1,169,966.00	35.9%	\$13,071,370.00	98.3%	\$976,030.00	6.7%	\$20,163,739.00	49.1%
2001	\$6,465.00	0.2%	\$3,089,734.00	51.9%	\$287,873.00	25.7%	\$7,810,534.00	97.9%	\$484,093.00	3.4%	\$11,678,699.00	36.6%
2002	\$1,673.00	0.1%	\$2,408,435.00	51.2%	\$70,898.00	3.3%	\$2,586,975.00	98.9%	\$69,908.00	0.5%	\$5,137,889.00	18.6%
2003	\$803.66	0.0%	\$1,684,518.23	64.7%	\$235,885.62	12.0%	\$9,650,694.63	99.4%	\$790,621.87	4.9%	\$12,362,524.01	36.1%
2004	\$1,577.94	0.0%	\$1,374,272.75	57.2%	\$139,387.55	3.6%	\$4,379,222.05	97.2%	\$28,426.44	0.2%	\$5,922,886.73	21.3%
2005	\$2,916.81	0.1%	\$1,045,929.71	35.4%	\$525,984.01	17.8%	\$16,495,183.41	99.5%	\$328,262.41	1.9%	\$18,398,276.35	42.9%
2006	\$4,768.20	0.2%	\$3,101,225.50	77.2%	\$1,445,964.24	26.9%	\$6,609,179.14	99.0%	\$228,324.00	1.1%	\$11,389,461.08	28.9%
2007	\$7,341.04	0.2%	\$2,785,779.92	51.1%	\$637,895.56	29.6%	\$31,975,325.04	99.7%	\$367,980.92	1.3%	\$35,774,322.48	49.6%
2008	\$2,599.09	0.2%	\$7,800,372.13	40.3%	\$2,052,034.69	33.3%	\$41,634,183.63	97.2%	\$560,955.37	4.2%	\$52,050,144.91	62.5%
2009	\$1,264.00	0.1%	\$1,159,766.30	10.6%	\$254,177.46	7.4%	\$8,710,838.14	96.2%	\$614,081.25	2.9%	\$10,740,127.15	23.7%
2010	\$9,286.50	0.9%	\$1,031,615.07	5.2%	\$51,987.69	1.4%	\$85,822,868.85	95.0%	\$731,874.80	3.0%	\$87,647,632.91	62.8%
2011	\$5,980.63	0.3%	\$717,984.72	7.5%	\$574,904.13	21.9%	\$35,786,596.74	97.2%	\$569,012.88	1.4%	\$37,654,479.10	41.5%
2012	\$180,473.84	9.7%	\$2,390,557.76	13.8%	\$125,337.98	5.9%	\$44,358,226.22	96.2%	\$1,585,661.88	3.5%	\$48,640,257.68	43.1%
2013	\$17,784.15	1.6%	\$2,176,375.20	14.3%	\$1,815,858.31	30.0%	\$96,357,284.46	97.4%	\$823,590.18	2.4%	\$101,190,892.30	64.8%
2014	\$15,888.68	1.3%	\$1,826,225.74	31.7%	\$570,590.60	10.7%	\$35,838,586.27	95.9%	\$561,917.98	1.2%	\$38,813,209.27	40.5%
2015	\$8,988.90	0.4%	\$1,254,984.28	24.2%	\$80,014.32	7.1%	\$64,291,451.53	98.8%	\$2,696,301.02	7.9%	\$68,331,740.05	63.3%
2016	\$898.39	0.1%	\$1,818,574.07	20.0%	\$181,902.05	2.8%	\$12,514,788.91	99.1%	\$577,984.69	2.4%	\$15,094,148.11	28.1%
2017	\$4,313.62	0.2%	\$11,400,140.82	45.1%	\$638,671.95	10.0%	\$63,289,542.83	98.2%	\$1,234,603.65	5.8%	\$76,567,272.87	64.0%
2018	\$3,734.70	0.2%	\$7,609,428.16	33.9%	\$789,291.14	11.1%	\$31,847,810.54	97.2%	\$748,716.78	5.0%	\$40,998,981.32	51.9%
2019	\$2,930.59	0.1%	\$3,933,088.09	29.9%	\$2,646,915.94	50.6%	\$45,987,489.01	98.2%	\$1,685,997.76	4.7%	\$54,256,421.39	52.3%
TOTALS	\$1,553,509.74	1.9%	\$95,960,982.45	35.2%	\$18,402,988.24	13.1%	\$879,727,573.40	96.0%	\$28,854,294.88	3.9%	\$1,024,499,348.71	47.6%

PWS 2001 - 2019 EXVESSEL VALUE\$ ANALYSIS SET GILLNET

YEAR	CHINOOK	%	CHUM	%	COHO	%	PINK	%	SOCKEYE	%	YRLY TOTAL	%
1984											\$0.00	0.0%
1985												0.0%
1986												0.0%
1987												0.0%
1988												0.0%
1989												0.0%
1990												0.0%
1991												0.0%
1992												0.0%
1993												0.0%
1994												0.0%
1995												0.0%
1996												0.0%
1997												0.0%
1998												0.0%
1999												0.0%
2000												0.0%
2001	\$1,859.00	0.1%	\$28,363.00	0.5%		0.0%	\$44,664.00	0.6%	\$1,321,431.00	9.4%	\$1,396,317.00	10.5%
2002		0.0%	\$1,484.00	0.0%	\$1,403.00	0.1%		0.0%	\$92,229.00	0.6%	\$95,116.00	0.7%
2003		0.0%	\$4,567.74	0.2%		0.0%	\$1,984.74	0.0%	\$570,394.92	3.5%	\$576,947.40	3.7%
2004	\$119.00	0.0%	\$13,660.02	0.6%	\$10,492.41	0.3%	\$3,620.79	0.1%	\$269,577.95	2.0%	\$297,470.17	2.9%
2005		0.0%	\$6,245.19	0.2%	\$2,992.22	0.1%	\$22,700.18	0.1%	\$506,524.55	3.0%	\$538,462.14	3.4%
2006	\$439.70	0.0%	\$22,201.84	0.6%	\$1,558.82	0.0%	\$7,288.11	0.1%	\$699,400.47	3.4%	\$730,888.94	4.1%
2007		0.0%	\$38,296.49	0.7%	\$532.37	0.0%	\$3,786.58	0.0%	\$791,620.93	2.8%	\$834,236.37	3.5%
2008	\$287.00	0.0%	\$172,273.70	0.9%	\$583.75	0.0%	\$9,528.58	0.0%	\$873,129.80	6.5%	\$1,055,802.83	7.4%
2009	\$945.45	0.1%	\$162,054.70	1.5%	\$9.00	0.0%	\$601.48	0.0%	\$932,039.85	4.5%	\$1,095,650.48	6.0%
2010	\$617.00	0.1%	\$383,221.84	1.9%	\$111.30	0.0%	\$11,815.90	0.0%	\$2,029,016.15	8.2%	\$2,424,782.19	10.2%
2011	\$1,450.19	0.1%	\$130,224.61	1.4%	\$832.86	0.0%	\$13,046.24	0.0%	\$1,932,383.04	4.9%	\$2,077,936.94	6.4%
2012	\$159.76	0.0%	\$124,831.84	0.7%	\$325.25	0.0%	\$18,538.69	0.0%	\$2,179,876.10	4.8%	\$2,323,731.64	5.6%
2013	\$4,137.00	0.4%	\$166,927.16	1.1%	\$884.40	0.0%	\$12,927.00	0.0%	\$1,736,388.35	5.0%	\$1,921,263.91	6.5%
2014	\$352.30	0.0%	\$88,848.79	1.5%	\$68.70	0.0%	\$17,445.17	0.0%	\$1,845,875.36	4.0%	\$1,952,590.32	5.6%
2015	\$2,197.10	0.1%	\$80,909.70	1.6%	\$5,119.90	0.5%	\$21,001.45	0.0%	\$2,011,298.21	5.9%	\$2,120,526.36	8.0%
2016	\$2,610.17	0.2%	\$93,206.32	1.0%	\$66.50	0.0%	\$8,249.96	0.1%	\$1,787,026.25	7.4%	\$1,891,159.20	8.7%
2017		0.0%	\$85,989.56	0.3%	\$677.35	0.0%	\$34,064.74	0.1%	\$1,603,122.70	7.5%	\$1,723,854.35	8.0%
2018	\$4,372.50	0.3%	\$95,388.17	0.4%		0.0%	\$48,896.81	0.1%	\$1,766,398.12	11.8%	\$1,915,055.60	12.6%
2019	\$730.16	0.0%	\$123,139.00	0.9%	\$659.50	0.0%	\$46,675.39	0.1%	\$2,151,921.45	6.1%	\$2,323,125.50	7.1%
TOTALS	\$20,276.33	0.0%	\$1,821,833.67	0.7%	\$26,317.33	0.0%	\$326,835.81	0.0%	\$25,099,654.20	3.4%	\$27,294,917.34	1.9%

**NOTE: Set Gillnet BLANK fields are "Confidential" with fewer than three processors reporting.

Submitted By
Leroy L Cabana
Submitted On
1/6/2021 12:22:07 PM
Affiliation
commercial fisherman



PC141
5 of 5

I am in favor of extending the PWS Board of Fishery meeting until at least October 2021. The ability to interact, have conversations and engage in normal BOF meetings without physical meetings due to the Covid pandemic justifies delaying the meeting. Vaccines are just now being distributed and it is unrealistic to believe the general public will be able to have in person meetings by March 2021. It is reasonable to believe the Covid pandemic will be behind us by fall of 2021. A couple hundred persons usually attend the PWS finfish meetings every 3 years. There doesn't seem to be anything on the current agenda that can not wait until the fall of 2021.

Submitted By
Lexie Bond
Submitted On
11/15/2021 8:00:19 PM
Affiliation



PC142
1 of 1

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

My family relies on the ability to harvest salmon under a subsistence permit on the Copper River. This proposal would reduce our fishing. This area feeds our family throughout the year on a single subsistence permit, with responsible harvesting annually. We take a small count compared to the counts taken by commercial fishing of the same fish population. Fishing that area without a boat would be impossible for anyone who does not have a fish wheel, which our family does not.

A concern was voiced regarding the number of fish reaching the spawning areas. According to a report from Fish and Game, the annual harvest from subsistence is significantly lower than that of commercial or personal use. I believe we are very fortunate to live in a state with subsistence opportunities, which families depend on and I believe they should be protected for all those who depend on a subsistence way of life.

Thank you for your time,

Lexie Bond



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial fisherman and the Executive Director of the Alaska Longline Fishermen's Association (ALFA). I am submitting these comments on behalf of ALFA's over 200 members. The Alaska Longline Fishermen's Association represents commercial fishermen who participate in fixed gear as well as salmon fisheries across the Gulf of Alaska and into the Bering Sea. Our membership is committed to sustainable fisheries and thriving fishing communities. The health of fisheries, and the actions of fishery managers, in one part of the state has implications for every other Alaska fishery and coastal community, hence PWS management decision affect our members. ALFA works to promote sustainable fisheries and thriving fishing communities across Alaska. Our members' livelihood depends directly on commercial fishing.

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,

Linda Behnken
alfafishak@gmail.com
(907) 783-3615



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 sport fisheries of Prince William Sound. My family operated a cannery in the past and family members commercial fished and are still fishing commercially. Salmon fishing is important as my family members commercial fish. I sport fish and eat salmon. Salmon fisheries boosts the economy in Valdez by providing jobs, sports fisherman buy goods here, charter boats, and moor their boats here in Valdez. Tourists come here to see the salmon at the hatchery or seiners fishing while out on the cruise boats Commercial fisherman buy goods and fuel, some moor their boats here. The hatcheries help the economy in this area. They also help in educating students about natural resources.

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,

Linda Guthrie
Tia.g@gci.net
(907) 831-1018

Alaska State Legislature



PC145
1 of 2



Leadership
Speaker of the House

Chair
Committee on Committees

Member
Rules Committee
Legislative Council
Fisheries Committee

Alaska State Capitol, #208
Juneau, AK 99801

Phone: (907) 465-2487
Free: (800) 865-2487

Interim:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: (907) 486-8872

REPRESENTATIVE LOUISE STUTES

Date: November 14, 2021

To: Alaska Board of Fisheries

Re: Support for Proposal 19

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

I write today in strong support of proposal 19, which was brought forward by Cordova District Fishermen United.

As you are well aware, the Copper River has suffered from historically low sockeye returns in recent years. During that time, no user group has shouldered more of the burden through closed waters and lost opportunity than the Cordova gillnet fleet.

Reducing the maximum harvest levels in the Chitina personal use fishery when the Copper River commercial harvest is 50% below the 10-year average by June 1st is a commonsense, in-season trigger to ensuring the needed escapement.

During years of such obvious scarcity, closing fisheries at the mouth of the Copper River without automatically reducing upstream allocations is not only inequitable, but it also seems counterproductive to the ultimate goal of ensuring adequate spawning.

The conservation burden on the Copper River needs to be equalized between all user groups and extend into the spawning beds. I am confident that proposal 19 would lead to a brighter future for all users on the Copper River and I respectfully urge your support.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

State House Representative for District 32
Proudly Serving Kodiak, Cordova, Yakutat, and Seldovia

Alaska State Legislature



Leadership

Speaker of the House

Chair

Committee on Committees

Member

Rules Committee

Legislative Council

Fisheries Committee



PC145
2 of 2

Alaska State Capitol, #208
Juneau, AK 99801

Phone: (907) 465-2487

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Interim:

305 Center Avenue, Suite 1

Kodiak, AK 99615

Phone: (907) 486-8872

REPRESENTATIVE LOUISE STUTES

Date: November 14, 2021

To: Alaska Board of Fisheries

Re: Opposition to Proposals 49-55

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

I am writing to voice my strong opposition to proposals 49-55, which are under consideration for action at the upcoming Board of Fisheries meeting in Cordova.

Limiting or reducing hatchery production in Prince William Sound (PWS) would result in significant economic and cultural harm to the region without appropriate scientific justification.

Proponents of such proposals claim that salmon hatcheries only benefit commercial users and damage wild populations.

The reality is that since its inception, Alaska's salmon hatchery program has provided countless harvests to all user groups statewide, including sport, personal use, and subsistence users, and has been an economic engine for coastal communities and state coffers.

Moreover, studies on the interactions between wild and hatchery populations are being rigorously pursued but remain incomplete. I urge the board not to get ahead of the science on this issue.

As to the economic benefits of the facilities in question, PWS hatcheries support 2,200 jobs, generate over \$100 million in labor income, and result in \$315 million in annual overall output; simply put, they are a mainstay of local fishing fleets and regional economies.

Based on these reasons, along with many others, I respectfully request that the Board reject proposals 49-55.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

State House Representative for District 32

Proudly Serving Kodiak, Cordova, Yakutat, and Seldovia

Submitted By
Maksim
Submitted On
11/15/2021 9:57:23 PM
Affiliation
Gillnet permit holder/captain



PC146
1 of 1

Hello,
I am a young 21 year old gillnet fisherman in the Prince William Sound/Copper River areas. I am heavily invested and in debt upon entering this fishery. Several of my friends are just as young and heavily invested into the fishery as I am. The state has set aside programs, training, and loans for us young fishermen to replace the old timers. But lately we have been struggling to make ends meet. I am here to support Alaska's Hatchery Program and the Impacts of Prince William Sound Aquaculture Corporation (PWSAC). Im also in support of CDFUs fight to secure fair accountability of the personal user fishery in Chitina.

Im in support of proposal 6 because inseason reporting is the only accurate way to measure any means of harvest. I am in support of proposal 7 because subsistence fisheries should never be mixed with guide fisheries. I am in support of proposal 8 because we need to have adequate returns for the little streams. I am in support of proposals 9,10, and 11 because our spawning grounds need protection. I am in support of proposals 14 and 15 because we needs kings to stay healthy in the rivers, when not being retained. I also support proposals 17, 19, and 20.

I oppose proposal 18 because boats already cause damage to the spawning grounds as is. I oppose proposal 21 as well.

The livelihoods of hundreds of young fishermen depend on these proposals. I hope the board can take this into account.

Submitted By
Mark E Buchner
Submitted On
1/15/2021 8:14:42 AM
Affiliation



PC147
1 of 1

Phone
5416477600
Email
nerka@bendcable.com
Address
P.O.Box 7819
Bend, Oregon 97708

I have been to numerous board of fish meeting for PWS since the late 1980's. You need to understand that the reason for in-person meetings is to instill the nuances of the people and the stake holders of the areas you are meeting for. This will not happen through a computer screen. You need to meet in person face-to-face with the people affected by the proposals you are considering. I have already purchased a plane ticket to arrive in Cordova on March 20th so that I can attend these meetings. I want to meet you guys in person as do all the other stake holders. I want and need to look you in the eye when I give my 3 minutes on the podium of what I beleive is important., just like I have done in the past. You cannot get the feel of what is happening through a computer screen. Either go through with the planned meeting or change the dates and or cycle.

On another note, this board is not legitimate. You have members who have not been confirmed so every proposal you rule on will result in a position that is not binding and will result in numerous legal actions. You have someone on this board who has never been to a Board of Fish meeting and you think think this is fair and balanced? You shoudl wait for legislative confirmation of all board members then reschedule at a time when all stake holders and interested people can attend. Thank you for letting me speak my opinion. Mark Buchner PWS fisherman.

Submitted By
Mark Palmer
Submitted On
11/13/2021 4:53:03 AM
Affiliation
Processor



PC148
1 of 2

Phone
2067695634
Email
mark.palmer@obiseafoods.com
Address
7947 Lake Alice Rd SE
Fall City, Washington 98024

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). I call on the Board of Fisheries to reject Proposals 49 – 55 due to the damage they would inflict on salmon fisheries across the southcentral region and the decreased hatchery production that would result if these proposals were implemented.

OBI Seafoods operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in Alaska seafood processing. Sustainable salmon stocks are the single most important issue to the long-term viability of our company.

For this reason, we have always supported a science-based approach to fisheries management. The Alaska Department of Fish & Game is second to none in applying scientifically collected data to determine the optimal hatchery contribution toward insuring maximum sustainable yield.

In the early 2000's under Gov. Frank Murkowski, the State of Alaska, through the salmon revitalize plan, partnered with industry to create more value-added products, jobs, capacity and higher utilization of the salmon resource. This program sparked millions of dollars of private investment and brought an industry back from the brink of collapse to the global competitor it is today. In other words: It worked.

The single most important part to maintaining our industry and its contributions to the state economy is a reliable source of salmon.

Alaska created the Fisheries Rehabilitation Enhancement Division 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 **science as the basis of our fisheries management in Alaska.**



PC148
2 of 2

Thank you,

Mark Palmer

President/CEO

OBI Seafoods, LLC

Submitted By
Mark Roodbeen
Submitted On
1/29/2021 4:36:41 PM
Affiliation



PC149
1 of 1

~Any chance to increase the sport fishing limit on rockfish for 2021?

There was limited sport fishing in 2020 due to Covid and it appears 2021 may well have limited pressure also.

Submitted By
MARK SPENCER
Submitted On
11/8/2021 2:02:29 PM
Affiliation
AK eXpeditions



PC150
1 of 2

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Proposal 6 - Oppose! Reporting as of now works fine and requiring 3 day reporting impacts travel plans because of lack of internet access in the area 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 the 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 to 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 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 are nearly 20 miles of river bank for people who wish to Dipnet from shore. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetters who waded 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 fowling 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 it's a Fishwheel operator who drives a boat to their wheel or a dipnetter, 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 a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar 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 an 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 structures 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 with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage, he stated *"while it's 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 want 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
Mary Tony
Submitted On
11/10/2021 3:18:28 PM
Affiliation
Private Chitina landowner



PC151
1 of 1

I ask the Board of Fisheries to adopt all of the proposals submitted concerning the Copper River dipnet fishery. The fishing out of boats must be banished at this time until salmon populations are stable and sustainable. The fishing from boats and near tributary creek or stream mouths has a severe impact on the salmon populations, especially the king salmon. I urge the Board to adopt all of these measures and take the opportunity at this time to stop the literal rape of the Copper River salmon by boats and irresponsible dipnetters/fishwheel users. I urge to Board to take advantage of adopting all the proposals and set a course of responsible fisheries management on the Copper River. The people who are adversely affected by the adoption of the proposals care more for money and rape of the salmon, because they come from other fisheries like the Kenai River where the king salmon are decimated. The people who really depend on the Copper River salmon runs will enjoy a stable sustainable salmon resource with the adoption of the proposals. If the Board cannot see the wisdom of approving the proposals, I say that the Federal government should take charge of the Copper River salmon fishery management. I am a landowner who is adversely affected by people who rape the salmon out of the stream mouth that runs into the Copper River on our land. The time to carefully manage the salmon populations is now by adopting these proposals. The time of careless destruction of ripping salmon out of the Copper River without regard for a sustainable population for the future is over.



November 14, 2021

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

RE: Oppose proposals 49 – 55, PWS BOF meeting

Chairman Carlson-Van Dort and Board Members,

I live in Homer and own and operate a family fishing operation and I am opposed to proposals 49 through 55.

Although I fish salmon in Kodiak, the health of the hatchery programs across the state is of great importance to me. Proposals 49 through 55 seek to reduce hatchery production for no identified specific benefit but would cause direct harm to thousands of fishing and processing businesses, communities, and recreational, personal use, and subsistence fishermen. I support the current system of oversight by the qualified biologists and managers of the Alaska Department of Fish and Game with public input through the Regional Plan Teams.

Alaska's hatcheries have operated with significant Department of Fish and Game oversight and public participation for over 40 years. Production has been stable for over 30 years without negative impacts to other fisheries and there is no need to interrupt this successful program. I believe the best time for these type of hatchery programmatic discussions is at the Board's hatchery committee meeting and during the Board's statewide meeting based on completed studies and known scientific information. For example, it's relatively easy to document salmon straying. However, it's much more complex to determine the amount of naturally occurring straying of wild stocks and whether or not straying of enhanced stocks adversely impacts wild stocks. In other words, the fact that straying occurs doesn't mean that, biologically speaking, straying is a problem to be solved.

The Alaska Department of Fish and Game is opposed to proposals 49 through 53 stating that "In permitting hatchery operations the department considers many of the concerns raised in this proposal, including the need to minimize negative interactions between hatchery-produced and wild salmon, minimize straying, and the need to ensure harvest practices targeting hatchery-produced salmon do not negatively impact wild fish." They are neutral on proposals 54 and 55 based on the allocative nature of them but point out that the "proposed reduction may result in the elimination of one or both remote release chum salmon fisheries."

In closing I ask that you follow the best available science and do not adopt proposals 49 through 55.

Sincerely,

Matthew Alward

Submitted By
Maxwell Harvey
Submitted On
11/14/2021 10:39:11 AM
Affiliation



PC153
1 of 2

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Anchorage, Alaska 99507

PROPOSAL 42: OPPOSE

Proposal 42 requests the lowering of the allocation trigger point for the set net commercial group. This proposed change is unrealistic and would consistently put us out of compliance. This proposed regulation change would have severe consequences towards the set net group and would be detrimental to the livelihood of its fishing fleet.

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 Eshamy District is the only district available for the set gill-net gear group to fish in. The set gill-net gear group has no other alternative fisheries resources available, while the drift and seine gear groups have multiple districts available to harvest salmon.

With no alternative fishing resources available and the history of set-netting in the Eshamy District, it is clear that our allocation and trigger are both justifiable, fair, and efficient.

I strongly oppose Proposal 42 and ask that this proposal is not approved. The set net group must retain our 1% trigger in order to meet the goal of the allocation plan.

Proposal 43: SUPPORT

Proposal 44: OPPOSE

I strongly oppose proposal 44. This proposal is an inaccurate, unnecessary request from the author and is an attempt to correct allocation that is already working. The set net fleet is already limited to 36 hours per week once we exceed our trigger point. It would be detrimental to the set net group if only allowed one opener a week after July 10th. Many permit holders would not be able to afford to wait around for one weekly opener and it would drastically effect livelihood of the fleet. If this district is closed we have no other options for places to fish, unlike the drift and seine fleet.

We ask that you not approve proposal 44, as the current set-net 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 stated in Proposal 45: "...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 gill-net permit holders continually claim that they can legally set between set-nets and hold their position within a couple fathoms. Illegally, they essentially become set-netters with the added ability to maneuver their 150 fathom net that runs between set-nets back to the beach."

This illegal "set-netting" by the drift fleet between set-net sites is a constant issue in the Main Bay subdistrict and I ask for the approval for Proposal 45.

Proposal 46 & 47 OPPOSE

Proposal 48 OPPOSE

I oppose this proposal, as management already has the ability to close districts to prevent intercepting wild/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 through 55 OPPOSE

I oppose Proposals 49-53, as they are all attempting to reduce hatchery production without reasonable data to justify the regulation change. Hatchery Stray Studies have not been completed and there could be extreme, unnecessary economic effects if these proposals were to be accepted. The passing of these proposals could also have detrimental effects on PWSAC and VFDA. Without these two viable

organizations in the sound, it would be extremely difficult to provide sustainable salmon for all user groups.

Proposal 58 OPPOSE



PC153
2 of 2

Seiners want daily fishing periods in AFK—too much risk of intercepting sockeye bound for Coghill 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.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Homer and commercial fish. I have been seining in the Prince William Sound since I was 7 years old and have owned my own seine operation for the last 22 years. Salmon fishing in PWS is my main 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.

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,

Megan Corazza
megancorazza@hotmail.com
(907) 299-0687

Submitted By
Meghan King and Scott Bingen
Submitted On
11/13/2021 9:11:33 AM
Affiliation
Area E permit holders



PC155
1 of 27

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Proposal 5-Oppose

Establish an optimal escapement goal for Copper River king salmon:

We urge the board to reject this proposal as it is not supported by the science or biology of the run and is against ADFG recommendations.



Submitted By
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11/13/2021 9:16:58 AM
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Proposal 6-Support

Require in season reporting of subsistence, sport fish, and personal use harvest and effort:

We urge the board to support this proposal. We support this effort to collect a more accurate database for in-season and real time harvest information. In river harvests have proven to cause detrimental effects to salmon runs and should be carefully monitored amongst the ever increasing user groups and access.



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Proposal 9-Support

Prohibit dipnetting from a boat in the Glenallen subdistrict:

The board should pass this proposal. The runs are sustaining more and more in river pressure. Dipnetting from a boat makes it hard for the fish to rest in deepwater pools on their journeys to their spawning grounds. It also supports tactics such as dragging the nets along the bottom and is inappropriately used in the guiding and charter industry. This is not the intended purpose of allowing locals a method to harvest fish sustainably for personal use in their home waters.



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Proposal 7-Support

Prohibit guiding in subsistence finfish fisheries:

The board should pass this proposal. We strongly support methods to regulate subsistence and commercial harvests separately. Guiding commercially for Alaskan subsistence rights is a mis-use of the resource.

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11/13/2021 10:22:21 AM
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5 of 27

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Proposal 10-Support

Prohibit dipnetting from a boat in the Upper Copper River District

The Board should pass this proposal. The runs are sustaining more and more in-river pressure and dipnetting from a boat makes it hard for the fish to rest in deepwater pools on their journeys to their spawning grounds. It also supports tactics such as dragging the nets along the bottom and is inappropriately used in the commercial guiding and charter industry. This is not the intended purpose of allowing locals a method to harvest fish sustainably for personal use in their home waters.



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Proposal 11-Support

Prohibit dipnetting from a moving boat in a portion of the Chitina Subdistrict.

The Board should support this proposal. If a boat is used in dipnetting, it should be part of the regulations to make it stationary, i.e. tied off to shore, as dipnetting is intended to be used. Chasing salmon with dipnets appears synonymous with allowing trawling in natal streams which is too much pressure on the fish for a sustainable outcome.

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PC155
7 of 27

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Proposal 18-Oppose

Extend specific permit and bag limits when dipnetting from a boat in the Glennallen subdistrict:

We urge the board to reject this proposal. This proposal will put greater upriver pressure on the fish by expanding unregulated personal and subsistence use used by the commercial sport fishing sector. This pressure is not needed while downriver fishing is losing territory.



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Proposal 19-Support

Reduce the maximum harvest level in the Chitina Subdistrict Personal Use Fishery when the Copper River commercial fishery harvest is 50% below the 10-year average on June 1:

We urge the board to pass this proposal. This proposal will help equalize a shared burden on the Copper River stocks and help protect the resource for all users. A similar regulation was removed from the books in 2017. As CDFU members and commercial fishermen, we would like to share the conservation of the salmon stock throughout the watershed and many user groups. The sport and guiding sector is growing and should be following reduced usage in times of low stocks.

Submitted By
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11/13/2021 11:08:44 AM
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9 of 27

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Proposal 20-Support

Amend the limit for salmon in the Chitina Subdistrict:

We urge the board to support this proposal. Limits are important to reduce ever increasing pressures from the public.

Submitted By
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Submitted On
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PC155
10 of 27

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Proposal 21-Oppose

Amend the opening date of the Chitina Supdistrict personal use fishery from June 7 to June 1:

We urge the board to reject this proposal. The sonar does not get put in early enough for a June 1 opening. Enough time needs to be allowed for proper data collection.

Submitted By
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11/13/2021 11:17:15 AM
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Proposal 27-Oppose

Amend subsistence fishing season to remove linkage between subsistence salmon fishing opportunity and commercial fishing periods:

We urge the board to reject this proposal. We do not want to limit a native persons access to fish, however, if this passes Board of Fish every Alaska will have the same opportunity and that is too much pressure on the fishery. It would be best for the native community to use federal avenues that are available for regulation changes.



Submitted By
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Proposal 28-Oppose

Amend household harvest limits for subsistence-caught salmon:

We urge the board to reject this proposal. We do not want to limit a native persons access to fish, however, if this passes Board of Fish every Alaska will have the same opportunity and that is too much pressure on the fishery. Federal avenues that are available would be better for regulation changes to keep access specific to their community.

Submitted By
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13 of 27

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Proposal 29-Oppose

Allow use of drift gillnets to harvest salmon for subsistence uses throughout Prince William Sound:

We urge to Board to reject this proposal. We do not want to limit a native persons access to fish, however, if this passes Board of Fish every Alaskan will have the same opportunity and that is too much pressure on the fishery. Federal avenues available to the native community would keep regulation changes specific to their access to the resource.

Submitted By
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PC155
14 of 27

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Proposal 38-Support

Establish restrictions in the Copper River Delta coho sport fishery based on the number of days the commercial fishery is closed:

We urge the board to pass this proposal. This proposal will help to ensure conservation when salmon counts are low.



Submitted By
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Proposal 39-Support

Extend the area closed to sport fishing in Ibeck Creek.

We urge the board to pass this proposal to help protect salmon habitat.



Submitted By
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11/13/2021 11:52:11 AM
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Proposal 40-Support

Close 18 Mile or Silver Creek to coho salmon fishing August 1 to November 1:

We urge the board to pass this proposal to help protect salmon habitat.

Submitted By
Meghan King and Scott Bingen
Submitted On
11/13/2021 11:57:03 AM
Affiliation
Area E permit holders



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17 of 27

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Proposal 41-Support

Repeal the mandatory closed waters from Copper River King Salmon Management Plan:

We urge the board to pass this proposal. We support the Copper River King Salmon closure area and continued protections on the Chinook run, however, this proposal opens up the language to give biologists more tools to manage.

Submitted By
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Submitted On
11/13/2021 12:01:15 PM
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Proposal 47-Oppose

Amend PWS Management and Salmon Enhancement Allocation Plan to provide management guidance for reducing Coghill District harvest of salmon stocks bound for other districts:

We urge the board to reject this proposal. These stocks are already accounted for in the current regulations.

Submitted By
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11/13/2021 12:10:16 PM
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Proposal 48-Oppose

Amend PWS Management and Allocation Plan to provide management guidance for reducing Coghill District harvest of salmon stocks bound for other districts:

We urge the board to reject this proposal. These stocks have already been accounted for in the current regulations.



Submitted By

Meghan King and Scott Bingen

Submitted On

11/13/2021 12:15:36 PM

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Proposal 49-Oppose

Amend the PWS Management and Salmon Enhancement Allocation Plan:

We urge the board to reject this proposal as it is already in regulation. This proposal is redundant as wild stocks are already accounted for in hatchery management.

Submitted By
Meghan King and Scott Bingen
Submitted On
11/14/2021 12:02:44 PM
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Proposal 50-Oppose

Amend the AFK Salmon hatchery Management Plan to reduce straying of hatchery-produced salmon as follows:

We urge the Board to reject this proposal. The hatchery is already managed according to the needs and health of our wild stocks. The proposal is redundant and unnecessary.

Submitted By
Meghan King and Scott Bingen
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11/14/2021 12:10:35 PM
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Proposal 52-Oppose

Amend the Solomon Gulch Salmon Hatchery Management Plan to reduce straying of hatchery-produced salmon, as follow:

We urge the Board to reject this proposal. The hatchery is already managed according to needs and health of our wild stocks. The proposal is redundant and unnecessary.

Submitted By
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11/14/2021 12:13:25 PM
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23 of 27

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Proposal 53-Oppose

Amend the WNH management plan to reduce straying of hatchery-produced salmon, as follows:

The hatchery is already managed according to needs and health of our wild stocks. The proposal is redundant and unnecessary.



Submitted By
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Proposal 17-Support

Establish specific permit and bag limits when dipnetting from a boat in the Glenallen subdistrict:

We urge the Board to support this proposal. This proposal will help maintain sustainability over a shared resource.

Submitted By
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11/14/2021 12:27:22 PM
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Proposal 31-Oppose

Increase the possession limit for sockeye salmon in the Upper Copper River:

We urge the board to reject this proposal. This proposal shifts the growing burden of conservation to downriver user groups. Conservation of the resource should be equalized among all user groups within the watershed. The Kenai model has proven that in-river fishing can be detrimental to the health of the fishery and therefore a more conservative, science based approach is necessary.

Submitted By
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11/14/2021 12:29:50 PM
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Proposal 32-Support

Allow harvest of rainbow trout 20 inches or less in a portion of the Gulkana River:

We urge the Board to pass this proposal. This will open up more opportunities to the commercial guide and sport fisher sector without increased pressure on salmon species. It could also potentially help reduce predation on juvenile salmon.

Submitted By
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11/14/2021 12:32:04 PM
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Proposal 33-Support

Allow harvest of rainbow trout 18 inches or less in a portion of the Gulkana River:

We urge the board to pass this Proposal. This will open up more opportunities to the guide and sport fisheries without increased pressure on salmon species. It could also potentially help reduce predation on juvenile salmon.

Submitted By
Melinda Miller
Submitted On
11/9/2021 8:38:33 PM
Affiliation



PC156
1 of 2

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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.

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 fowling 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 take and an additional burden on the user to obtain multiple permits and additional reporting.



PC156
2 of 2

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!



November 14, 2021

Chairwomen Märit Carlson-Van Dort
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811

RE: Comments on 2021 Prince William Sound Finfish and Shellfish Meeting - Proposal 43

My name is Michael Bowen. I am a second generation PWS commercial fisherman. I have been involved with most PWS fisheries during my career for the last 50 years. I have served on the PWS/CR advisory committee, BOF working groups, PWSAC Board of Directors for 18 years and participated in the BOF process for the last 40 years. My main source of income is the PWS Drift Fishery.

Thank you for the opportunity to participate in the BOF public process to help formulate regulations that result in healthy fisheries. I will not be able to attend the meeting in person due to prior engagements. Please contact me if you have any questions on the proposal. 907-354-3312 copperdogfish@gmail.com

PROPOSAL 43

**5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.
Repeal the definition of enhanced salmon stocks**

As the author of the proposal I **Support** it.

This proposal asks that the value of all enhanced salmon produced in PWS/CR be included in the allocation plan. The current plan is based on value and by excluding a major pink salmon hatchery that produces half of the enhanced pink salmon in PWS it completely distorts the value and the plan in favor of one commercial user group over the other commercial user groups. Since the adoption of the current plan the seine fishery has harvested on average over 66% of the enhanced salmon value compared to the drift fisheries 33% (see ADF&G table 47-2 below).

When you factor in these numbers the current plan does not meet its intended purpose to provide a fair and reasonable allocation of the harvest of enhanced salmon or its intent to allocate enhanced salmon stocks in the Prince William Sound Area to maintain the long-term historic balance between competing commercial users that has existed since statehood, while acknowledging developments in the fisheries that have occurred since this plan went into effect in 1991.



When PWSAC, State of Alaska and VFDA started building hatcheries in PWS, pink salmon was the quickest and easiest to produce which benefited the seine fishery. The gillnet and setnet gear groups were asked to be patient and when the production of other species came online enhanced salmon production would "float all boats equally based on historic values prior to enhancement"

The current plan has been in effect for 16 years and a lot has changed since the last review and modification. I would ask the Board to adopt the proposal and include all enhanced salmon in the current plan or form a BOF committee to review the plan with stakeholder involvement to see if the plan can be improved in meeting its purpose and intent. I would gladly volunteer to serve on this committee.

Thank you,

Michael Bowen
5413 Sandhill Loop
Anchorage, AK 99502

Attachment included:

ADF&G table 47-1 and 47-2 from page 110 of the ADF&G staff comments for 2017 PWS BOF meeting



Table 47-1.—Values and percentages by gear type for PWSAC enhanced stocks, 2007–2016.

Year	Drift gillnet		Purse seine		Set gillnet	
	Value	Percent	Value	Percent	Value	Percent
2007	\$30,375,938	58.7%	\$21,361,107	41.3%	\$1,287,859	4.9%
2008	\$25,052,932	31.2%	\$55,194,763	68.8%	\$1,300,085	2.3%
2009	\$20,330,294	57.7%	\$14,894,564	42.3%	\$1,578,785	5.9%
2010	\$13,178,750	35.6%	\$23,825,054	64.4%	\$3,408,733	3.2%
2011	\$13,947,405	86.0%	\$2,279,015	14.0%	\$2,867,582	6.9%
2012	\$30,375,938	58.7%	\$21,361,107	41.3%	\$3,125,836	5.7%
2013	\$25,052,932	31.2%	\$55,194,763	68.8%	\$2,405,648	2.9%
2014	\$20,330,294	57.7%	\$14,894,564	42.3%	\$2,725,780	7.2%
2015	\$13,178,750	35.6%	\$23,825,054	64.4%	\$1,930,673	5.0%
2016	\$13,947,405	86.0%	\$2,279,015	14.0%	\$1,821,330	10.1%
Grand total	\$206,646,752		\$258,522,975		\$22,452,310	
5-yr average		46.7%		53.3%		5.2%

Table 47-2.—Values and percentages by gear type for PWSAC and VFDA enhanced stocks, 2007–2016.

Year	Drift gillnet		Purse seine		Set gillnet	
	Value	Percent	Value	Percent	Value	Percent
2007	\$8,369,927	22.6%	\$28,671,689	77.4%	\$1,288,350	5.7%
2008	\$18,061,741	26.5%	\$49,993,820	73.5%	\$1,300,278	2.9%
2009	\$15,560,084	61.5%	\$9,742,664	38.5%	\$1,578,807	7.2%
2010	\$36,635,693	29.7%	\$86,685,100	70.3%	\$3,411,756	5.0%
2011	\$25,240,526	46.4%	\$29,143,723	53.6%	\$2,867,876	10.1%
2012	\$30,438,464	42.9%	\$40,467,239	57.1%	\$3,132,507	5.7%
2013	\$25,153,004	23.8%	\$80,553,028	76.2%	\$2,413,363	2.9%
2014	\$20,365,621	35.4%	\$37,147,046	64.6%	\$2,727,022	7.2%
2015	\$13,193,346	22.0%	\$46,833,330	78.0%	\$1,931,730	5.0%
2016	\$13,962,508	53.3%	\$12,237,321	46.7%	\$1,821,765	10.1%
Grand total	\$206,980,913		\$421,474,960		\$22,473,453	
5-yr average		32.2%		67.8%		3.6%



In opposition to Proposal #43

The issue presented in proposal #43 was thoroughly, investigated, discussed, and rejected by both the Seine and Gillnet groups as part of the 3 year process to formulate and adopt the current Prince William Sound Management and Salmon Enhancement Allocation Plan by the BOF in 2005.

To resurrect this discussion of an issue that received extensive attention would be a monumental waste of time for all parties involved.

Especially, in light of the fact that the Plan adopted in 2005 with participation and agreement from all groups, has performed fairly and reasonably as intended for the past 16 years.

Sincerely,

**Michael Durtschi
Secretary/Treasurer
Northwest and Alaska Seiners Association**



In support of Proposals #47 and 48

To the Board of Fish,

Proposals #47 and #48 are an effort to level the playing field of allocations between the Gillnet and Purse Seine groups.

Prior to the 2017 PWS BOF meeting when the Gillnet group asked for and received additional wording to the *Prince William Sound Management and Enhancement Allocation Plan for the Southwest District, interception in the Southwest, Eshamy, and Coghill Districts* was essentially a, live and let live proposition.

The words, “and where , to the extent practical, the department shall manage to reduce the harvest of stocks bound for other districts”, are the words added.

After the 2017 BOF decision to direct the department to restrict the Purse Seine harvest of stocks bound for other areas, time and area to fish at AFK was severely cut back. This would be fine if the Purse Seine group were the sole interceptors of fish bound for other areas. Such is not the case.

As noted in the staff comments regarding these proposals, larger numbers of enhanced fish exclusively for the Seine group are intercepted by the Gillnet group in the Eshamy and Coghill districts than are intercepted by the Seine group in the Southwest.

In addition to enhanced salmon interception in the Eshamy and Coghill districts, substantial numbers of wild salmon are intercepted as well. Many of these intercepted wild salmon are bound for exclusive Seine group areas at a time the department is looking for adequate escapement to allow fishing time and area for the Seine group.



The department has an important job managing the PWS salmon fishery. It can be difficult to satisfy the competing interests. Management works hard to first and foremost protect the salmon stocks, but also be fair and equitable to the gear groups. Adoption of these proposals would provide clarity in perpetuity by enshrining equal wording in regulation governing an allocation plan that is documented as being 50% for the Gillnet group and 50% for the Seine group.

Sincerely,

***Michael Durtschi
Secretary/Treasurer
Northwest and Alaska Seiners Association***



In opposition to proposals #49-#55

In the early 1980's The Alaska Legislature banned fish farming in State waters and subsequently embraced hatcheries as a means of enhancing salmon production and boosting the Statewide salmon economy.

These hatcheries have provided their intended results. In addition to the Commercial fleet, Sport and Subsistence groups receive benefits.

At this time the science is inconclusive that hatchery releases are having a detrimental effect on wild salmon stocks and the ocean environment.

Alaskan hatchery releases of enhanced salmon to the North Pacific are only a portion of the combined total when grouped with Japan, Korea, and Russia.

If and when recognized, reputable science shows a detrimental effect, Alaska should share the burden of reduced hatchery releases with our international partners.

Regarding straying of salmon. Thank goodness salmon stray. After the last ice age the nearest salmon to Alaska was down around California, Oregon and Washington. If nature had not given salmon the inclination to stray, we would not be having this discussion.

On a light note, the same could be said about the human race and all of us here today.

Sincerely,

**Michael Durtschi
Secretary/Treasurer
Northwest and Alaska Seiners Association.**



In Support of Proposal #58

Proposal #58 is essentially a place holder in the event the Board does not adopt Proposals #47 and #48.

Adoption of proposal #58 with out adopting proposals #47 and #48 would return interception of stocks bound for other areas in the Southwest, Eshamy, and Coghil districts to the live and let live situation that existed before the wording was added to the Southwest district portion of the *Prince William Sound Management and Salmon Enhancement Allocation Plan in 2017*.

Sincerely,

**Michael Durtschi
Secretary/Treasurer
Northwest and Alaska Seiners Association**

Submitted By
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11/14/2021 2:17:05 PM
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I strongly oppose Proposal 5. Creating an OEG will not benefit the sustainability of Copper River King Salmon. ADFG has the proper tools at its disposal to properly manage the Copper River salmon fishery.

I support Proposal 6 and believe that timely reporting will benefit the sustainability of Copper River salmon runs for years to come. Although ADFG does not currently have the ability to process this information in-season, I believe that as the data adds up over the years, it will become a useful tool.

I strongly support Proposal 7. The board should pass this proposal because subsistence fisheries were never intended to be commercially guided. This proposal would clarify the language to the rules original intent.

I support proposal 8 because it will contribute to the long term health and sustainability of our Sockeye and King salmon runs.

I support proposal 9, 10, 11, 12, and 13. Dip netting from a boat on the Copper River needs more regulation. Currently, subsistence and personal use are able to harvest salmon at the mouths of tributaries, next to subsistence fish wheels, near folks dipnetting from shore. It all adds up to a dangerous situation. Dipnetting should be done from shore as it was traditionally done.

I strongly Oppose proposal 18. The board should not expand the Chitna subdistrict boundary. Expanding the district will have negative consequences on the sustainability of King and Sockeye runs. Putting more dangerous boats in front of the folks dipnetting from shore will push the fishery further from its traditional sustainable beginnings.

I support proposal 19. I believe that this proposal, if passed, would allow more participation by all users on years with mediocre returns. Currently ADFG manages the lower fishery to achieve the in-river goal, but this in-river goal assumes that the run is healthy enough to support the maximum allocation for all upstream users. Passing proposal 19 will share the burden of conservation with upstream users.

I oppose Proposal 21. I believe the regulation as it currently reads is an important tool used for the sustainable management of the Copper River fisheries.

I support proposal 38. The small Copper River Delta coho fishery needs to be managed wholly. The commercial fishery is restricted when there is not an abundance. The sport fishery needs to be similarly restricted to protect the longterm health of the Delta coho runs.

I support either Proposal 56 or 57. These proposals provide a reasonable way to reduce participation in the fishery while not changing the overall users.

I support Proposal 58. ADFG does not need to manage for allocation in season. The allocation plan works itself out at the end of the year.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 and commercial, sport, and subsistence fish. As a commercial fisherman, the health of Prince William Sound's fisheries is my utmost concern. I want to see generations come enjoy and profit off of the region's incredible resources.

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,

Michael Hand
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(603) 493-9939

Submitted By
Michael Lu
Submitted On
11/15/2021 4:28:18 PM
Affiliation



PC160
1 of 1

Proposal #6-Oppose Proposal #7- Strongly oppose Proposal #8- Oppose Proposal #10 - Strongly oppose Proposal #11 - Oppose
Proposal #12 - Strongly oppose Proposal #13- Strongly oppose Proposal #14 - Strongly oppose Proposal #15 - Strongly oppose
Proposal #16 -Oppose Proposal #14 -Oppose

Submitted By
Michael Mickelson
Submitted On
11/15/2021 10:15:54 AM
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1 of 2

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Support

6,7,9,10,11,17,19, 23, 32, 38, 39, 40, 41, 42, 57, 60, 61, 62, 63, 64,65, 66, 67, 68, 69, 70, 71, 72, 79

Oppose

5, 18,21,25, 26, 27, 28, 29, 31, 35, 43, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 58

Comments

Support

6 - The department does not currently use in season reporting for subsistence, sport fish, and personal use, if the information became available in a timely manner managers would certainly take note of it. This timely information could be critical on years with small runs where conservation is a concern, as well as large runs when a surplus of fish exist and could be harvested.

9,10, - These proposals have identified a practice that is not customary and traditional in a subsistence fishery and should be supported.

38 - This proposal will be critical on years of low abundance.

39 - This area of the Copper River Delta gets the majority of the sport fishing pressure. There is still plenty of sport fishing opportunity even with this small closure.

40 - This stream is the one of the few places where salmon spawning consistently happens on the south side of the Copper River Highway. The water is very shallow and fish are very vulnerable during their spawning process.

41 - Proposal 41 would give the Department of Fish and Game more flexibility to manage the Copper River Commercial fishery. ADF&G has demonstrated repeatedly that they can keep the commercial fishery closed when conservation concerns exist.

Oppose



5 - The Alaska Department of Fish and Game is currently managing the Copper River for maximum sustained yield. make changes to the escapement goal as that is the job of the Department. The department has already shown its ability to provide extended closures when conservation is necessary. This is a purely allocative proposal.

7 - Guiding Services in subsistence fishery is contrary to the intention of a subsistence fishery and is not part of the customary and traditional use standards.

18 - The Copper River salmon fisheries are already fully allocated, this proposal creates more fishing area which will result in greater catch by the personal use user group. Additionally it creates an enforcement issue, which ADF&G outlined in their comments.

21- The personal use fishery is having no trouble getting their allocation of fish from the Copper River with the current start date of the fishery. The subsistence fishery upriver from the personal use area needs to get their early season fish and this proposal makes it harder for them to do so.

50-55 The Board of Fisheries have limited authority in these areas. The hatchery operators already utilize the public RPT process where these concerns can be addressed. That is the correct forum for these proposals.

27 - This proposal is complicated by the ans findings for the Cordova area. Adding a Saturday subsistence opener has increased harvest on the Copper River already. Creating an opportunity for wide open subsistence harvest is sure to increase harvest on the Copper.

28 - Salmon bag limits are lower for Prince William Sound subsistence users because there are other subsistence fish available such as halibut that are not found in the interior.

31 - This proposal is comparing apples to oranges. The Copper River is not the Kenai River and should not have the same bag limit. The department has already shown its ability to add additional fishing time and bag limit on years of great abundance.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 depend on salmon fishing for a reliable source of protein throughout the year and as a way to make my living. Salmon are life.

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,

Michael Schumm
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(616) 581-5121

Submitted By
Michelle Williams
Submitted On
11/15/2021 4:24:49 PM
Affiliation



PC163
1 of 2

I oppose proposals 42 & 44 as the set net fishermen and women have been robbed of their rights to fish since the inception of the Prince William Sound Management & Salmon Enhancement Allocation Plan. The set gill netters in Prince William Sound have been around as long as the seiners and drifters, if not longer, but because Fish and Game lost our records from before the 1964 earthquake, we got cheated out of our fair share when the Enhancement Allocation Plan came into effect.

I have been a set gill netter for 36 years going on 37 in 2022 and I have seen blatant disregard by the drift gill fleet toward us and blatant disregard for the regulations that are in the books on what they are legally allowed to fish.

Please Please do not let proposals 42 & 44 pass.

Submitted By
Michelle Williams
Submitted On
11/15/2021 4:49:23 PM
Affiliation



PC163
2 of 2

Please pass Proposal 45 as there needs to be an increase in distance between a set gill net & a drift gillnet especially in the THA in Main Bay.

Every Year set net gear is getting damaged by drifters as they cannot stay the legal distance away from a set gill net and end up floating into a set net and getting the nets tangled or they go completely around a set gill net, get tangled, then when they pull their nets away they ruin a set netters gear, plus they pull the set net anchors and cut the lines in order to get their nets free.

I quit fishing Main Bay area due to the drift fleet not fishing legally, and the troopers unable to stop the problem. Hopefully this proposal will help.

Submitted By
Mike Adams
Submitted On
10/29/2021 8:56:03 AM
Affiliation
area e drift fisherman



PC164
1 of 1

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politics aside please understand that a reallocation of spring timed returning sockeye and chinook is simply destroying our trust in adfg! allowing one user group to exploit the copper river needs to stop or the Copper will resemble what has happened on the Kenai. as a thirty year drift fisherman why hasnt there been gear size/depth restrictions in put in place? or like in bristol bay why cant there be areas that you register for and need to stay in regardless of run strength...my point is Closures are the only tool thats being pushed on the copper river. I fully Support pwsac but question their cost recovery and their estimating of biomass size which has cost the Gillnet fleet hundreds of thousands of dollars not to mention the faw fish tax that Cordova needs to operate. Also in pws the department is slow to recognize the huge influx of users in the western sound causing conflicts with commercial and recreational users...keep the openers concurrent 24hrs in all of mainbay and all of Ester stop micromanaging its proven not to work. lastly when there is time restriction on the delta for the commercial Coho fleet all sport fishing above the highway needs to be curtailed Thank you Fv Redpack

Submitted By
Mike Pommarane
Submitted On
1/19/2021 11:55:21 AM
Affiliation



PC165
1 of 1

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Baker City, OR, Oregon 97814

To: Board of Fish Members and any other interested parties:

Re: This comment is in reference to proposals 38, 39, and 40 for the Price Williams Sound, Cordova area sport and commercial fishing proposals.

My name is Mike Pommarane and I have been traveling to Cordova, Alaska, predominately with the same 5-7 guys every year since 1988. Our primary interest in traveling to Cordova, besides seeing several friends we have made along the way, is fly fishing for Silver Salmon. Like most of the coastal rivers and streams in your great State, Cordova has world class salmon runs and the fishing (both commercial and sport) can be sustainable for future generations when managed properly. I believe the many state agencies and boards do a great job of managing the state's fishery resource. I also believe that a wide array of opinions provides a comprehensive view, when coupled with common sense, makes for the best governmental regulations, policies, and practices.

I have huge respect for commercial fishermen. One of my closest friends is a commercial fisherman in the Prince Williams Sound area and I have been out with him and personally witnessed his vocation many times. Our conversations often revolve around fish, salmon in particular, and why certain runs have better returns than others. I am not a scientist, but it appears that ocean conditions and spawning habitat are just two of the many causes of dwindling returns of anadromous species. Very likely they are the primary causes of poor returns.

I am all for enhancing habitat and spawning grounds for fish. From my perspective, limiting and closing sport fishing as outlined in proposals 38, 39, and 40 will do very little enhance salmon runs in the Copper River Delta. We specifically target chrome and fresh out of the ocean fish and stay clear of and spawning beds or redds in the area. A lot has changed in terms of sport fishing in Cordova over the past 30 years. The word has been out for some time that Cordova is a premier Coho fishing destination and the "secret spots" now have manicured trails to them that encourage traffic. In all my years in Cordova, I have not seen sport fishermen exceed daily catch limits or derogate spawning grounds or harass spawning fish.

I am against proposals 38, 39, and 40 and believe that more flexible creel limit restrictions on the number of sport fish kept for personal consumption each day which are based off current and accurate escapement statistics is a better alternative. I also believe that fish habitat education and law enforcement support is a better approach to comprehensively shutting down sport fishing in the Cordova area, which is what these proposals will likely end up doing.

Respectfully submitted,

Mike Pommarane

Submitted By
Mikhail Glasionov
Submitted On
11/12/2021 9:29:25 AM
Affiliation



PC166
1 of 1

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24 years Alaskan. Family of 5 raised here in Alaska. Deep netting at Cooper River for 20+ years. At the younger age was climbing up and down the Canion with my family trying to catch fish for the year. However with the age and medical issues it became impossible. Subsistence fishing from the boat became the only way some older folks can still keep it possible. Firmly oppose most of upcoming propositions: 6,7,8,9,10,11,12,13,14,15,16,17,19,20,41

Support proposition: 5,18,21,22

I looked at the numbers from the report on adfg website 2020 there was 1.62 million fish taken by commercial, 250,000 by personal use and 85,000 by subsistence. Doesn't seem to be any real management goal that will be met by taking away boats or only boats.

Welcome to contact me for more detailed information

Thank you

Submitted By
Milan
Submitted On
11/14/2021 7:45:40 PM
Affiliation



PC167
1 of 2

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mdg07177@netscape.net
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53455 Fishermans Rd
Kenai, Alaska 99611

To The Board of Fish

About the proposals for dip netting on the Copper river. Here is my opinion on these proposals.

The short version is;

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!

The long version is;

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 canyon walls or shore. As a professional mariner I feel that forcing lay people to navigate their boats into very very 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!

Thank You.

Milan Galej



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Homer, Alaska and participate in the commercial, subsistence, and sport salmon fisheries of the Prince William Sound region, as well as through processing. I started fishing in Prince William Sound in 2001 on my father's boat. I purchased a seiner in 2009 and started fishing in 2010. Since then I have had operated a vessel in either the PWS seine fishery or the LCI salmon seine fishery. Today, fishing is my only income and with it I support my wife and 3 children. My sister and her family as well as my parents have boats involved in the PWS salmon seine fishery.

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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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,

Morgan Jones
capenilchik@gmail.com
(907) 202-1912

Submitted By
NATHAN LONG
Submitted On
3/12/2021 2:44:50 PM
Affiliation



PC169
1 of 1

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Po Box 308
Glennallen, Alaska 99588

Proposal title: Moose creek, copper river basin. Prince william sound/upper copper and upper susitna rivers finfish and shellfish

Moose creek: sport anglers may use baited or unbaited single hook artificial lures. bag limit is 2 and 2 in possession. season is open year round. only catch and release fishing is allowed from april 1 to may 31.

I Nathan A Long agree and support the proposal of Bonnie Mcleod for the protection of grayling and and other wildlife of Moose creek that runs through Glennallen and drains into the tazlina river



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 sport fisherman from Nikiski. I was born and raised in Alaska and salmon is one of my family's most important and frequently eaten foods. While most the salmon we eat comes from Cook Inlet, we do enjoy fishing silvers from Seward occasionally—but most importantly not having salmon available in PWS would likely increase the pressure and competition even more where we normally fish.

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

Sincerely,

Nathan Smith
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(907) 776-3639

Submitted By
Nathaniel A. Kelsey
Submitted On
11/8/2021 4:54:06 PM
Affiliation



PC171
1 of 1

Prop 6 Oppose, Prop 7 Strongly Oppose, Prop 8 Oppose, Prop 9 Oppse, Prop 10 Strongly Oppose, Prop 11 Strongly Oppose, Prop12 Strongly Oppose, Prop 13 Strongly Oppose, Prop 14 Strongly Oppose, Prop 15 Strongly Oppose, Prop 16 Strongly Oppose, Prop 17 support, Prop 18 Strongly Support, Prop 19 Strongly Oppose, Prop 21 Support, Prop 22 Support



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau Alaska 99802-1668

November 10, 2021

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

Dear Chairman Carlson-Van Dort:

The Alaska Region National Marine Fisheries Service wishes to provide the Alaska Board of Fisheries with the following information on one regulatory proposal for your consideration during the upcoming meeting in Cordova, Alaska that could impact State of Alaska and Federal fisheries participants. Please let us know if you have any questions concerning our letter.

Sincerely,

James W. Balsiger, PhD.

Administrator, Alaska Region



**Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish
Interaction between Federal and State of Alaska Fisheries
Alaska Board of Fisheries Meeting – November 30 – December 6, 2021
NMFS Comment (Proposal 1)**

Proposal 1: 5 AAC 28.2XX. Create new regulation to establish a longline skate fishery in Prince William Sound.

Potential Issues:

- *A directed fishery for longnose and big skates could increase bycatch of halibut, sablefish, important rockfish species such as yelloweye and black rockfish, and other skate species.*
- *Skates are slow growing with low fecundity and can spend several years to over a decade, depending on the species, in the juvenile stage. If immature skates are disproportionately exposed to fishing pressure, it could lead to unsustainable populations.*
- *Directed fishing in state waters in PWS could potentially impact the overall GOA longnose and big skate stocks.*

Proposal 1 seeks to create a longline fishery in Prince William Sound (PWS) (part of federal reporting area 649) for longnose and big skates and base the fishery on 25% of the Eastern GOA total allowable catch (TAC). It is unclear if this proposal seeks to create two separate State fisheries (one for longnose and one for big skates) with each fishery based on 25% of their individual federal TACs, or if it seeks to create one combined skate fishery where the two species would share the same guideline harvest level (GHL). Longnose skates and big skates are managed federally as single species and the skate stock complex assessment evaluates each of these species separately. As a result, each species has a separate acceptable biological catch (ABC) and TAC. Managing these two species under a single GHL could result in overfishing of a species if one skate species was predominantly targeted over another.

Currently the federal survey does not include reporting area 649 and this area is not included in the ABC calculations for skates. Therefore, bycatch in area 649 is not currently deducted from the federal TAC for any skate species. Although skates in area 649 are not currently being deducted from the federal TACs, they could in the future if survey data for the area is included in the stock assessment. This proposal seeks to create a fishery based on the federal TACs. However, if area 649 is accounted for in the skate stock complex assessment in the future the Council will need to account for any State GHL fisheries before setting the TACs. It is recommended that State GHL fisheries be based on federal ABCs, and not TACs, so that the Council can accommodate State fisheries in their TAC setting process. However, since the PWS area is not currently being used in the federal stock assessments to inform the ABC it may be more appropriate to base a GHL fishery on surveys conducted by the Department of Fish and Game in PWS. The federal ABC and TAC may not be reflective of the actual biomass of skates available in PWS.

Directed fishing for skates could increase bycatch of other important commercial species. Skates are often encountered while halibut fishing with longline gear. It is possible that they share habitat and halibut may be encountered while directed fishing for skates. If halibut was open to directed fishing then any halibut of legal size encountered could be retained if a vessel had available Individual Fishing Quota (IFQ). However, if the halibut fishery was closed, or the vessel did not have IFQ, then the halibut would be discarded as a prohibited species (PSC). In addition, other skate species, rockfish, sablefish, or other species may be encountered during skate directed fishing. The extent of possible bycatch is unknown since there has not been federal skate directed fishing and there is no federal observer data. However, during the State GHL fishery in PWS for skates in 2009 and 2010, it was reported that halibut bycatch amounts exceeded the catch of either skate species. In addition, the biomass of big skates was greater than longnose skate in 2009 and 2010, and there were reports of high discards of big skates while trying to target longnose skates.

The 2019 stock assessment of the skate stock complex in the GOA states that skates are a slow growing species with low fecundity and population stability likely depends on high survival rates of animals to maturity. Although data is sparse for Alaskan skate species, some studies in other areas have shown that skate species with the largest body sizes (such as longnose skates and big skates) are the least resilient to high fishing mortality rates. This may be due to fishing pressure being applied to skates while they are still in the long juvenile stage and have not yet reached maturity. During the State GHL fishery in PWS for skates in 2009 and 2010 it was reported that big skate catches comprised predominately of immature females and longnose skate catches comprised of mature males and females. If the majority of skates removed from the stock are immature and have not yet reached an age to contribute offspring, the skate population could decline as a whole. As a result, precautionary management of these species has been recommended.

Data regarding skates in the GOA is extremely limited and more research is needed on the effects of fishing on skate populations. According to the stock assessment, adult skates are highly mobile and likely cross between areas. Eggs and juveniles use different habitat than adults and little is known about the nursery areas used by skates in the GOA. Directed fishing for skates may disrupt these nursery areas or other important skate habitat. Due to these factors and the possibility of directed fishing disproportionately harvesting juvenile skates, directed fishing in PWS could impact overall skate populations in the entire GOA.

Background on federal Gulf of Alaska (GOA) skates management:

The skate complex in the GOA has been broken out into three categories for management purposes since 2005: longnose skates, big skates, and other skates. Overfishing levels (OFLs), ABCs, and TACs for longnose skates, big skates, and other skates in the GOA are recommended by the North Pacific Fishery Management Council (Council) and established by the Secretary of Commerce on a yearly basis. The Council recommends the OFLs and ABCs for longnose skates, big skates, and other skates for the entire GOA. The ABCs are apportioned to each of the GOA regulatory areas (Western, Central, and Eastern) for longnose skates and big skates based on the distribution of trawl survey biomass among each of the areas. The Council then recommends the TACs for each of the three skate categories so as not to exceed the ABCs. In

most years the TACs are set equal to the ABCs. PWS is in federal reporting area 649, which is part of the Eastern Gulf of Alaska.

There is currently no directed fishery for any skate species in the GOA federal fisheries. The maximum retainable amount (MRA) of skates prior to 2016 was 20%. However, fishermen were targeting skates while participating in other directed fisheries early in the year which increased the likelihood that skates catch would be reached and exceed the TAC/ABC and would require a skates prohibited species closure. A prohibited species closure requires any skates encountered to be discarded. Beginning in January 2016 the MRA was reduced to 5% to decrease the incentive for fishermen to target skates while participating in other directed fisheries and to more accurately reflect the encounter rate of skates during fishing.



Chenega IRA Cou

3000 C Street, Suite 200 South Wing
Anchorage, Alaska 99503-3975



PC173
1 of 2

Contact: Buell Russell, Village General Manager
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Fax (907) 569-6939
Email brussell@chenegaira.com

November 15, 2021

Via Email: dfg.bof.comments@alaska.gov

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

Re: Statement in Support of Proposals 26 and 27

Dear Board Members,

The Native Village of Chenega is a federally recognized Alaska Native Tribe located in southwestern Prince William Sound. The Chenega people have occupied the lands in and around Prince William Sound since time before memory. Chenega urges the Board to adopt Proposals 26 and 27 to improve subsistence salmon fishing in Prince William Sound and ensure that Chenega can continue harvesting salmon at its traditional locations for distribution to tribal members—as Chenega has done for countless generations.

Proposal 26 would create a new community fishing permit authorizing Chenega to harvest up to 1,000 sockeye salmon and 50 king salmon by drift or set gillnets. Chenega's intent is for authorized representatives to fish with tribal members—teaching traditional subsistence practices and then distributing the harvest. Chenega would use the same fishing gear that is currently authorized for subsistence salmon in the Southwestern (Chenega), Eshamy, Coghill, and Northwestern Districts of Prince William Sound. Importantly, Proposal 26 would ensure that Chenega may harvest a limited number of salmon at traditionally and culturally significant locations, including Eshamy Lagoon, which is currently a regulatory closed area.

Proposal 27 would allow subsistence salmon fishing within Prince William Sound seven days per week. Currently, subsistence fishing is allowed during days that the commercial fishery is open and Saturdays.

Proposals 26 and 27 are designed to increase subsistence participation and to provide subsistence salmon for distribution to tribal members. The current regulations prohibit Chenega from distributing subsistence salmon harvests as a tribal activity. Although Chenega has participated in ADF&G's educational fishery permit program with success, a community-based



fishing permit under Proposal 26 would not have the same curriculum requirements and participation limits as ADF&G's annual education permits. Thus, Chenega would be better able to meet its tribal members' educational, cultural, and nutritional needs through a flexible—but limited—authorization to harvest sockeye and king salmon as a tribe in traditional fishing areas.

ADF&G's staff comments report that on average only 11 subsistence salmon permits are issued for Prince William Sound. The average reported harvest for salmon is 48 fish. There is clearly a decline in subsistence participation, but there has been no corresponding decline in the need for salmon as an important food source. (The amount necessary for subsistence ("ANS") was set by the Board at 2,100-2,5000 salmon for Chenega.) Chenega tribal members and residents have met their need for salmon in other ways, including through sharing and distribution by individual tribal members and commercial fishery home pack.

The lack of subsistence participation can attributed, partly, to the fact that current regulations do not reflect typical subsistence harvesters' resources and needs. Current individual bag limits and proxy regulations severely restrict the ability for tribal members to harvest on behalf of the entire tribe for wide distribution. And Chenega residents are forced to compete with "all Alaskans" during subsistence openings on Saturdays in over-crowded fishing areas, such as Main Bay.

Harvesting salmon for subsistence is intricately linked with Chenega's traditions and culture. It is vital that Chenega's subsistence way of life be protected and improved. Chenega urges the Board to adopt Proposals 26 and 27.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry Evanoff", written over a horizontal line.

Larry Evanoff, President,
The Native Village of Chenega

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

**Formal On-Time Public Comment to the
Alaska Board of Fisheries
Prince William Sound Finfish
2021/2022**

PROPOSAL 5: OPPOSE The absence of long-term stock specific productivity data on Copper River Chinook salmon limits the ability to further refine the sustainable escapement goal beyond what ADF&G has recommended in Joy et. al 2021. Proposal 5 is redundant and lacking in peer reviewed statistical evidence. NVE is in support of the Sustainable Escapement Goal recommended by ADF&G and supported by Joy et al. 2021 with the caveat that future escapement goal assessments consider differences associated with a potential shift in enumeration methods.

PROPOSAL 6: SUPPORT We support timely reporting for all users of Copper River Salmon.

PROPOSAL 8: SUPPORT We support the prohibition of dipnet harvest at river confluences in the Upper Copper River.

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

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

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

PROPOSAL 17: OPPOSE While we support the intended outcome of this proposal, we do not believe that providing an additional supplemental limit to those fishing from a boat is a valid means of conservation.

PROPOSAL 18: OPPOSE The area of the Copper River immediately below the current boundary is easily the most dangerous section of the river, with a large whirlpool on the western side, and a shallow gravel bar to the east. To navigate the whirlpool a boat must avoid the gravel bar and ride the corner of the whirlpool with little room for error. If gravel is encountered a jet powered boat can be slowed so that it cannot get out of the whirlpool. If the boat goes too far into the whirlpool, it can easily become overpowered and swamped in an unsurvivable accident. As we operate our fisheries camp near this obstacle, we are highly familiar with it, and at some flows, do not travel through that section of river. We urge extreme caution in opening a fishery in such an unsafe area and encourage the board to consider some of the other proposed remedies to relieving boat congestion in the fishery.

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

The extension of the Chitina Subdistrict Boundary below Haley Creek would place a portion of the Chitina Subdistrict in the Prince William Sound District. Will the fishery have two managers or will the boundary be moved? These issues are important and should be thoroughly thought through before considering this proposal.

PROPOSAL 19: SUPPORT We 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 The purpose of the delayed start is to allow the stocks that must travel the farthest (i.e. the early run stocks) some passage before commencing harvests. This applies to sockeye and chinook salmon and should be maintained.

PROPOSAL 22: OPPOSE To demonstrate a negative C&T finding one must consider the criteria, not establish a negative finding because other species that are qualitatively perceived to have a stronger case for a positive finding received a negative finding.

PROPOSAL 23: OPPOSE

PROPOSAL 24: OPPOSE Restrictions being recommended are stricter than sport fishing regulations, for this to be approved annual body of water sport fishing limits would also need to be approved.

PROPOSAL 27: SUPPORT We appreciate the liberation of catch-limited subsistence fisheries from commercial fishing periods but can see potential conflict for user groups and issues for law enforcement. We would support subsistence fishing opportunity alternating with commercial to keep the gear groups separated, with opportunity managed in alternating gear zones and terminal harvest areas to allow hatcheries to achieve cost-recovery and broodstock goals and minimize conflict. We support a prohibition of all fisheries in Terminal Harvest Areas during cost recovery and broodstock collection.

PROPOSAL 28: MODIFY We seek to modify this proposal to include an additional supplementary limit of pink/chum salmon equal to the household limit for salmon.

PROPOSAL 29: MODIFY We seek to modify this proposal to allow a supplementary harvest of pinks and chums requested in our modification of Proposal 28 to be harvested during normal subsistence opportunity on Saturdays and during commercial fishing periods, as well as by drift gillnet at any time in the regulatory commercially closed waters within Orca Inlet.

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

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

PROPOSAL 39: OPPOSE We oppose proposal 39 due to the following biological concerns. The majority of Ibeck Creek coho salmon spawn above the current regulatory marker therefore gains in habitat protection are minimal with an expansion of the closed area. Furthermore, because the Scott River intersects with Ibeck Creek immediately above the Copper River Highway downstream waters are unproductive for sport fishing during much of the coho salmon season, therefore this proposal would decrease an open area of 3.0 miles to a 0.25 mile stretch of clear water. This change in area will shift sport fishing pressure away from Ibeck Creek which is biologically detrimental for the following reasons: 1) Ibeck Creek, hosts the largest coho salmon spawning population on the delta and can therefore sustainably host a relatively high proportion of fishing pressure when compared to smaller delta stocks; 2) the majority of Ibeck Creek coho salmon spawning occurs above the current regulatory marker therefore stream crossings and sport fishing presence has little impact on Ibeck Creek spawning grounds; whereas many other delta streams are shorter in length with a large proportion of coho salmon spawning in close proximity to the Copper River Highway, these areas may be negatively impacted by increased fishing related activity. Proposal 39 intentions are to protect coho salmon spawning habitat on Ibeck Creek however gains in habitat protection will be minimal and the negative impact to other delta populations of coho salmon could be substantial.

PROPOSAL 40: SUPPORT We 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 We support allowing managers to provide fishing area adequate to conserve chinook salmon.

PROPOSALS 49-55: OPPOSE We are opposed to this suite of proposals. In the past decade we have seen hatcheries in Prince William Sound as a major driver of subsistence, sport, and commercial fisheries success. The open and inclusive Regional Planning Team (RPT) provides a public process that uses the best available science to set release goals for hatcheries and this process should not be bypassed in favor of a political process. The RPT process has worked very well in establishing releases at each site and should be permitted to continue to operate as they have.

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

PROPOSAL 69: SUPPORT OPTION B



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 and commercial and subsistence fish. I make my living as a commercial fisherman. Salmon fishing is the foundation of our community in Cordova, providing income and opportunity for hundreds of families.

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,

Nelly Hand
nellyhnd@gmail.com
(907) 317-2958



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



PC176
1 of 1

November 15, 2021

RE: Alaska Board of Fisheries Prince William Sound Finfish
Oppose Proposals 49 - 55

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

The North Pacific Fisheries Association (NPFA) is a commercial fishing organization based in Homer, Alaska, representing more than 70 family fishing operations utilizing a variety of gear and vessel types. Our members participate in fisheries throughout Alaska, from Southeast to the Bering Sea, in both state and federal waters, and many participate in Prince William Sound (PWS) salmon fisheries. Benefits of the PWS salmon fishery are felt throughout our community.

NPFA urges the Alaska Board of Fisheries to oppose Proposals 49 - 55 and continue to allow ADF&G biologists and managers to oversee the State of Alaska PNP Hatchery Program.

NPFA supports the current system of oversight by the qualified biologists and managers of the Alaska Department of Fish and Game. At the BOF October 2018 Work Session, ADF&G presented Special Publication No. 18-12 Salmon Hatcheries in Alaska – A Review of the Implementation of Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks <http://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2018-2019/ws/SP18-12.pdf>. This document explains the precautionary methods used for management and demonstrates why Proposals 49 – 55 are unnecessary.

A Commercial Fisheries Entry Commission database search shows over 90 Prince William Sound (Area E) commercial salmon permits with Homer addresses. These, combined with permit holders residing in other areas who keep their vessels in Homer, add up to a significant contribution to the Homer area both in terms of Marine Trades and community involvement. The current system of well managed PNP Hatchery Programs with comprehensive oversight from ADF&G is quite valuable to the community of Homer and NPFA urges the Board of Fisheries to continue to support it. Please oppose Proposals 49 – 55 and allow the professional ADF&G biologists to continue to do their jobs.

Respectfully,

G Malcolm Milne
President, North Pacific Fisheries Association



NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.

1308 Sawmill Creek Road
Sitka, Alaska 99835
Office: (907) 747-6850 fax: (907) 747-1470

November 12, 2021

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: **Opposition to Proposals 49-55**

Chairman Carlson-Van Dort, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to comment on proposals submitted to the Alaska Board of Fisheries (BOF) for the Prince William Sound/Upper Copper/Upper Susitna Rivers Finfish & Shellfish meeting. The Northern Southeast Regional Aquaculture Association, Inc. (NSRAA) strongly **opposes** BOF Enhancement **Proposals 49-55**. To preserve the valuable time of the BOF members NSRAA is not offering detailed comments at this time. NSRAA offers our full support and concurrence with the detailed comments submitted by the Valdez Fisheries Development Assoc., Inc. (VFDA) and the Prince William Sound Aquaculture Corporation (PWSAC) in opposition to these proposals. Specific rationale for opposition on each proposal may be found in their comments.

NSRAA encourages the BOF to **oppose** proposals **49-55**. Proposals nearly identical to **49-53** have been submitted to the BOF for the January 2021 Ketchikan BOF meeting by the same proposer. Representatives from NSRAA and the other hatchery operators will be available at the Cordova BOF meeting to provide any information that may assist the board in their deliberation process.

Once again thank you for the opportunity to comment and thank you for the work you do on behalf of the subsistence, sport, personal use, and commercial fisheries of the state.

Sincerely,

Scott Wagner
General Manager
scott_wagner@nsraa.org



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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've spent 40 years of gillnetting Copper River salmon & fishing Prince William Sound. Salmon fishing in the Prince William Sound region is our livelihood & food resource.

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,

Osa Schultz
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(907) 253-5269

Submitted By
Otis Rowland
Submitted On
11/10/2021 1:07:02 PM
Affiliation



PC179
1 of 1

Phone
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orowland1970@gmail.com
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2091 Edward Dr
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I support dip netting from boat and extending lower limit 1/2 down stream. I support Proposal # 5,18,21 and 22. I oppose proposals 6,7,8,9,10 ,11,12 ,13, 14 ,15 ,16 ,17 ,19,20 and 41.

Submitted By
Patrick P McCormick
Submitted On
6/27/2021 3:24:47 PM
Affiliation



PC180
1 of 2

Phone
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Address
10207 Chain of Rock St
Eagle River, Alaska 99577

Proposal 7: I support this proposal. PU fishing was never intended to be a commercialized fishery.

Proposal 15: I support this proposal. Allowing the use of gillnets in dip nets will greatly increase mortality of non target species, especially steelhead.

Proposal 17: I support this proposal. Establishing reasonable limits for subsistence users is prudent for a fishery on the road system which any Alaskan resident may participate.

Proposal 19: I support this proposal. All non subsistence fisheries should equally share in the conservation burden during times of poor abundance.

Proposal 20: I support this proposal. P/U users should share in the conservation burden. Furthermore this would allow the commercial fleet the ability to harvest salmon at the peak of market value. Lastly this would allow managers to spread harvest out throughout the season rather than front loading escapement to insure in river goals are met. This will ensure that specific runs are not over escaped or over harvested later in the season.

Proposal 26: I do not support this proposal: Limiting subsistence opportunities to one group of residents is unconstitutional.

Proposal 32: I do not support this proposal. The Gulkana river is the most northern population of steelhead in the world, as such very restrictive management is prudent, especially with no science to back up the anecdotal claims by the author of the proposal.

Proposal 33: I do not support this proposal. A better way to solve the problem of mortality of king gear is to make bait illegal in the Gulkana River. Bait is hardly necessary for targeting king salmon.

Proposal 35: I support this proposal. Moose Creek grayling are at special risk of over exploitation given the proximity of this run to population centers therefore more restrictive management is prudent.

Proposal 38: I support this proposal. All user groups should share conservation burdens

Proposal 39: I support this proposal with different language. Restricting the targeting of spawning salmon is prudent, however closing the area to all fishing should not happen as people should be able to target non salmon in salmon spawning areas where trout and char congregate. Closing trout/char fisheries is not prudent.

Proposal 40: I support this proposal. This system is very small and it would be very easy to over exploit the coho population. This system should remain open to trout and char fishing.

Proposal 41: I support this proposal. Mandatory closures are unnecessary, especially considering the current very conservative management of this fishery. Furthermore, opening inside waters during foul weather is prudent for the safety of the fleet.

Proposal 43: I support this proposal. PWS hatcheries are tilted towards the seine usergroup. There are more gillnet permits than seine permits in area E despite this more fish are allocated to seiners.

Proposal 45: I do not support this proposal. Set netters regularly exceed their allocation by allowing drift gillnets to fish the beaches during short sets we will better achieve allocation objectives.

Proposal 46: I support this proposal. Because of the mesh regulations gillnetters must have multiple multi thousand dollar nets to compete with better capitalized fishermen. By allowing deep nets earlier in the season gillnetters would only need one sound net. Currently fish passage to WNH is managed by closure of the granite bay and esther sub districts rather than limiting gear depth.

Proposal 47: I do not support this proposal. Seiners are allocated a vast majority of the fish in Area E. Furthermore, this would limit opportunities to target main bay hatchery fish in the Coghill District.

Proposal 48: I oppose this proposal. Seiners are allocated a vast majority of the fish in area E. Often the Eshamay district will be closed to "protect wild pink salmon" yet the Northwest District will be open to seining, which makes no sense when a vast majority of the pink salmon in the Eshamay district are heading to the northwest district. Furthermore this would limit the ability of gillnetters to target chum

salmon heading to the coghill district.

Proposal 58: I oppose this proposal. Seiners are allocated a vast majority of the fish in area E. Protecting fish bours is prudent in any enhanced fishery.



PC180
2 of 2

Proposal 60: I support this proposal. Having a comprehensive list of closed waters is essential to ensure that I do not inadvertently fish in closed waters.

Proposal 62: I support this proposal

Submitted By
Paul Delys
Submitted On
11/15/2021 4:41:49 PM
Affiliation



PC181
1 of 1

Proposition 5 - Support

Proposition 6 - Oppose. It's my understanding that ADF&G fisheries managers say they get all the information they need for in-river management from the Miles Lake sonar. It would be expensive, burdensome, and, apparently, not helpful, to require in-season harvest reporting . . . so why do it?

Proposition 7 - Oppose. Plenty of Alaskans don't have a boat, fishwheel or access across private property to subsistence fish upstream of the bridge. There shouldn't be a problem with guided outings to allow those people to take their share of Alaska's bounty.

Propositions 9, 10, 11 - Oppose. Prohibiting subsistence dipnetting from a boat is just plain mean. There are very limited opportunities to participate in the Copper River subsistence fishery without one.

Proposition 12 - Oppose. It sounds ridiculous that boaters can't dipnet within 50' of a shore fisher. And how does the submitter propose that be enforced?

Proposition 14, 15 - Oppose. Given gillnet max mesh size limites, dipnets strung with gillnetting are a bigger danger to smaller reds than kings.

Proposition 18 - Support. I've fished the lower end of the PU area from a boat before. It can get a dangerous where there are a few boats down there. There's not much room to maneuver and boat wakes crossing boat wakes plus some current can add up to a fair element of danger. Extending the boundary would spread things out and calm them down.

Proposal 19 - Strongly oppose. If the return is weak, F&G can throttle every user groups' fishing time. If the run recovers, everyone can fish again, if not, everyone feels the pain. There's no point nor any fairness in diminishing the personal use allocation for a season because the commercial users haven't caught enough fish by an arbitrary and early date and the run could very well materialize later than expected.

Proposal 20 - Strongly oppose. Why should the very productive Copper River waters have a smaller PU bag limit than the south-central PU fishery? The current 25/10 limit does not seem unreasonable and has only been in effect for a few years. The 15/30 proposal seems quite inequitable towards families with more mouths to feed.

Submitted By
Paul Owecke
Submitted On
11/9/2021 8:26:42 AM
Affiliation
Self



PC182
1 of 3

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Paul Owecke-PWS Finfish Comment

Ms. Chair and Members of the Board,

Thank-you for taking the time to read this and all comments in order to make informed decisions on fishermen's behalf. My name is Paul Owecke and I currently participate in the PWS setnet fishery. I have been an active permit holder for 39 years. I was a founder and past president of Prince William Sound Setnet Assoc. Prior to setnetting, I have participated in various crab fisheries as well as halibut. Prior to setnet I was employed as a Fish Culturist for ADFG FRED (Fisheries Rehabilitation and Enhancement Division) for five years. My last position was Fish Culturist III, Main Bay Hatchery, PWS.

As there are many new BOF members who may not be familiar, I would like to give brief general information regarding the setnet fishery. With only 28 permit holders it is one of the smallest gear groups for any fishery in the state. Setnet harvest is limited to a single fishing district (Eshamy), one of the smallest fishing districts in the state. Published accounts record commercial harvest in the Eshamy district dating to 1895 and specific references to setnet harvest began in 1904, the year in which the government began the systematic collection of fishery statistics of Alaska. (Statistical Review of the Alaska Salmon Fisheries Part III: Prince William Sound, Copper River and Bering River, Willis and Ball 1932) Both drift gillnet and seine fisheries in PWS utilize multiple districts.

Within Main Bay of the Eshamy District is located the Prince William Sound Aquaculture Corporation hatchery of Main Bay. This is the largest, most successful sockeye smolt production facility in the world. It has realized returns to the common property fishery since 1983. Prior to the building of Main Bay Hatchery, ADFG FRED published and released a Scoping Document for Main Bay Hatchery that was distributed throughout the PWS region (libraries and ADFG offices) and outlined the reasons and expectations for building Main Bay Hatchery. In the scoping document there was clear intent to benefit the setnet fishery and this was part of the rationale for building Main Bay Hatchery, in order to benefit the setnet fishery.

Proposal 26 - Oppose I oppose this proposal specifically from the standpoint of protecting returning sockeye salmon to Eshamy Lake. This wild stock of sockeye are currently not reaching escapement goals set by ADFG and there has been a reduction in funding to adequately utilize the weir on Eshamy River that monitors escapement. The group of users this proposal would enable in harvesting Eshamy sockeye also has the largest return of enhanced sockeye salmon in the world to utilize rather than targeting a vulnerable wild stock.

Proposal 27 - Oppose All current participants in the subsistence fishery have ample opportunity to harvest and achieve fulfillment of current fish bag limits. No additional time or area are justified at this time.

Proposal 42 - OPPOSE The author of this proposal seeks to attain "parity" between user groups that is in direct conflict with the original intent of the remediation measures implemented in the 2004-2005 allocation plan to balance harvest percentages between user groups. As an 04-05 attendee I was the sole setnet participant in the committee working with BOF chair Mel Morris on crafting allocation. It was made clear that there was full expectation that all user groups would be in and out of compliance with their respective allocation percentages due to the nature of fluctuating salmon returns. It was also made clear that the setnet user group could be moved in and out of compliance more as a result of fluctuation in the much greater harvests of drift gillnet and seine. With that fact in mind, a trigger of one percentage point was accepted by all participants as appropriate.

The intent of the remediation measures was predicated on the idea that the allocation percentages could be exceeded and the remediation measures would move the exceeding party back into compliance without undue harm over time. That was the rationale for a rolling five year average and a reasonable trigger for the setnet user group that would not have them out of compliance with their allocation on a permanent basis. This was an acknowledgement that there is and will be disparity between user groups within the allocation plan and that remediation was intended to work over a course of years without drastic punitive consequences for any user group.

Adoption of Proposal 42 would implement a remediation trigger of 0.25% for setnet that would guarantee over time that the setnet user group would be permanently out of compliance with their target allocation. This would set in motion further proposals to limit setnet harvest and calls for drastic remediation measures. There is at this time no reason to seek the "parity" that the author of this proposal seeks to attain. The current allocation policy anticipated disparity in harvest between user groups and implemented means to bring balance over time which has been accomplished in large part. All three gear groups in PWS have had the good fortune of maintaining viable harvest levels over time. I believe there is no valid reason at this time for the BOF to adjust allocation percentages or triggers for any user group.



Proposal 43 - Support

Proposal 44 - Oppose. The author of this proposal desires an excessively punitive means to remedy what he sees as a “parity” issue between the user groups. As discussed in proposal 42 above, the original intent of the remediation measures in the allocation plan are to be accomplished over time and without drastic punitive outcomes to the gear group being brought back into compliance. As currently enforced, the remediation measures imposed on the setnet group have had a very consequential reduction in harvest by the setnet group. However, those reductions in harvest have also been overshadowed many years by large swings in seine harvest in particular. When there has been large reductions in seine harvest, due to variable pink salmon returns, this causes a numerical shift that pushes up the harvest percentage totals in drift and setnet. This is an unavoidable consequence of mathematics more than over harvest by the setnet group. The setnet group does not have enough participants or harvest capability to offset large shifts in either drift or seine harvest or fish prices. There is no punitive remedy that can change this dynamic, and to go down the road of implementing punitive measures to bring “parity” will not meet with success, as the math remains unchangeable.

As currently enforced, the maximum 36 hours in weekly fishing time if the setnet group exceeds its 5% allocation has brought a reduction in setnet fishing time per week that typically ranges between 50% and higher. This percentage changes as the total open weekly fishing time varies according to management. Recently, ADFG management has had the district open two 36 hour periods per week. In some years, periods have gone 48 or more hours, while some years periods have been reduced to 24 or 12 hours. With two 36 hour open periods per week the setnet group sees a 50% reduction in fishing time under the allocation plan. This has been consequential for the setnet group, and has imposed significant hardship. To now modify this as proposed in 44 to be more punitive will only serve to harm the most vulnerable in the setnet group. In years when setnet fishing time is reduced, a sizable portion of setnet permit holders that have more productive sites discontinue fishing, and those with less productive sites continue fishing the reduced hours in order to stay economically viable. To now further punish as outlined in this proposal, it will have further negative impacts on those less able to weather the consequence. I request that the Board not impose more punitive measures on the setnet group. The Allocation Plan is functioning as intended with all user groups having viable and fair fishery outcomes.

Proposal 45 - Support The conflict between drift and setnet within the Main Bay Subdistrict must be resolved before there are injuries or property damage. With reduced returns to both Main Bay and the Copper River, there is now intensified efforts by drift participants to disregard setbacks between set and drift gear. Due to current setbacks being vague enough, drift operators feel they can deploy gear between setnets that are placed 50 fathoms apart, but the current regulations state that drift and set gear must be 25 fathoms apart. The practice of illegally fishing too close to set gear by drift participants is becoming normalized as it has been repeated by so many without consequence. The prevalence of illegal fishing has overwhelmed enforcement’s ability to deal with the magnitude of the problem. With fleet radio coordination, most illegal fishing is avoided when protection officers are present. Flyovers have resulted in prosecution of offenders, but enforcement resources are limited. This proposal will solve this issue, and there is precedent within this district as to how to accomplish this.

A similar scenario was occurring in the Crafton Island Subdistrict where drift operators were continually fishing illegally too close to set gear. The Alaska State Troopers, Protection, submitted a proposal (1996) to increase the distance setback between set and drift gear so as to remove any question regarding whether a drift net could be set between setnets placed 100 fathoms apart. Previous regulation stipulated a 50 fathom setback between set and drift gear yet drift operators regularly set between setnets placed 100 fathoms apart. The proposal submitted by Protection (BOF approved) increased the setback between set and drift gear to 60 fathoms and there was no longer a question whether drift nets could be deployed between setnets 100 fathoms apart. This has eliminated the problem and resulted in no reduction in harvest for the drift fleet.

The setnet group has submitted this proposal previously and it has been wrongly portrayed by the drift fleet as allocative. It was not allocative when approved previously in the Crafton Island subdistrict, nor would it be allocative in this instance. The majority of the fish harvested in any given year are harvested legally, it is a minority of rogue drift operators that need to be stopped. Setnet gear being stationary will not realize any increase in harvest due to curtailing illegal operators. And, the curtailing of illegal round hauling between setnets will serve to more equally distribute fish to legal drift operators. Another factor to consider is that for the majority of the season the AGZ (Alternating Gear Zone) terminal harvest area is open one of the two open periods per week to setnet only and virtually all setnet harvest is conducted within the AGZ, leaving the entire remainder of Main Bay open to drift harvest with no setnets present. There is typically only one period per week where there are conflicts between drift and setnet gear and this further negates any claim of allocation being an issue. Approval of this proposal will see the majority of the fleet carry on an orderly fishery, and the rogue operators will be prevented from illegal harvest. Please approve this proposal in order to restore order to a chaotic scenario.

Proposal 46 - Oppose ADFG currently uses emergency order to effectively allow the use of deep gear anytime it is deemed necessary and does not threaten other stocks. The adoption of this proposal would result in the interception of numerous wild stocks besides the targeted hatchery returns.

Proposal 47 - Oppose There is no data to substantiate the claim that “large numbers” of salmon from other districts are harvested in the Coghill District. There has been incidental harvest of salmon from other districts in every harvest area targeting returning hatchery fish, in no current instance, including Coghill District, has there been numbers great enough to warrant ADFG to alter management.

Proposal 48 - Oppose There has been incidental harvest of salmon from other districts in every harvest area targeting returning hatchery fish, in no current instance, including Eshamy District, has there been numbers great enough to warrant ADFG to alter management.

Proposals 49 thru 55 - Oppose All these proposals seek to address extremely complex issues with a one size s the reality of the overall complexities. They make assumptions that simple hatchery reductions will resolve issues th causes related to factors unrelated to hatchery production. There is currently much research being conducted that w decision making in addressing the concerns of the parties submitting these proposals. One factor that is not addressed by these parties is the high probability that changing climate is a major factor in the issues and that by assigning blame to just hatchery production will preclude addressing other pertinent factors like changing climate.



Proposals 56 & 57 - Oppose One of the best means to facilitate a fair distribution of a resource is to have gear uniformity between harvesting participants. Approving these proposals breaks with all participants having uniform amounts of gear and will lead to giving harvest advantage to a particular subset, and disadvantage the remainder.

Proposal 58 - Oppose The seine fishery in the Southwest District, which includes the Armin F. Koernig harvest area referenced in this proposal, has a long documented history of intercepting stocks bound for areas throughout PWS. The words they are seeking to delete have guided ADFG in making the most biologically sound decisions for stocks outside of this fishing district. ADFG must not lose the ability to manage this fishery in a biologically sound manner. The proposal states that fishing in compressed time frames on buildups of fish is the rationale for this proposal. Those conditions are the reality of all hatchery terminal harvest areas, and if participants find that not to their liking they can choose other areas open concurrently with this fishery.

Proposal 59 - Oppose Until such time that ADFG determines that opening these closed waters will not have detrimental effect on wild stocks or intercept other fully utilized stocks (hatchery or wild), this proposal should not be approved as it may adversely affect wild stocks or harvesters in other areas.

Proposal 60 - Support Updating of GPS coordinates is needed. Any updating that occurs within the Eshamy District must be done so as to maintain the historical (signposted) closure boundaries in relation to setnet sites delineated by Shorefishery Leases issued to setnet fishers in the Eshamy District.



January 10, 2021

To Who It May Concern:

I wanted to write to you to express my concern. My wife and I (and sometimes other family members as well) have been traveling from Utah to Cordova Alaska to sport fish for silver salmon every year for the past 20 years or so. We have normally been spending a week and sometimes longer every September fishing the Eyak and Ibek rivers as well as some of the other streams and tributaries in the Cordova area. We even came in last year when we had to go through medical testing and travel restrictions due to the pandemic. We have come to love the area and when we arrive in Cordova we feel like we have come to a second home.

Unfortunately in recent years we have felt that the quality of sport fishing has declined dramatically. While there is always a variation from one year to another in the volume of the silver run we have noticed that in the last few years the commercial fishing operations in the area have dramatically impacted the sport fishing in the Eyak river. The commercial fisherman are now apparently periodically targeting silver salmon by essentially blocking the entrance to the Eyak river with their nets for intermittent periods of time which almost completely cut off the supply of fish coming up stream for at least a day and sometimes longer. I understand that the commercial fisherman need to make a living but their tactic of setting up nets at the mouth of the Eyak allows for few if any fish to travel up river basically shutting down the sport fishing opportunity completely. Last year when we were in Cordova for a week the first two days of fishing were normal and then the river went completely dead. I assumed that the run had ended early but was later informed that the commercial fishing operations were out in the mouth of the Eyak catching the fish. For most of the rest of the week we could find very few fish. There must be a better approach that can balance the needs of the commercial fisherman with the people traveling long distances and spending large sums of money to sport fish.

Recently I was made aware of new proposals being made in the Prince William Sound / Cordova fishing proposals. In particular I was deeply troubled by proposals #38, #39, and #40. In effect these proposals would close off sport fishing opportunities by shutting vast areas of river fishing (such as the Ibek river and 18 mile tributaries) as well as closing off sport fishing all together even in the Eyak when commercial fishing is being curtailed. I believe that if these proposals are implemented it will effectively end sport fishing in the Cordova area. Many years when we come in we get heavy rains which make the Eyak very cloudy and difficult to fish. In those years we are able to fish in the Ibek which clears more rapidly or the smaller tributaries in the "18 mile" area. If those areas are closed to fishing then in many years there will be almost no opportunity for sport fishermen to catch silver salmon in Cordova.

We have loved coming into Alaska every year to the beautiful Cordova area. I believe that if these changes are implemented it will unfortunately be the end of our travels there. I hope that you will consider the concerns of this sport fisherman (and probably others) and balance that with the needs of the commercial fishing industry. I would be happy to speak with anyone if there are questions about my experiences. Thanks for your consideration.

Sincerely,

Pete Mazeika

250 N 1400 E

Pleasant Grove, Ut 84062

801-358-2027, Pmaze60@gmail.com

Submitted By
Peter Deane
Submitted On
11/7/2021 4:52:59 AM
Affiliation



PC184
1 of 1

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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 fowling 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!

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 12:34:48 PM

Affiliation

Seine/Dungie crewman; PWS drift permit holder



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Proposal # 5: OPPOSE

An optimal escapement goal of 40,000 Chinook is not supported by ADFG, nor is it based on the Biological Escapement Goal for king salmon in the Copper River drainage. In 2017, ADFG recommended lowering the goal to 18K for the health and sustainability of this Chinook run. The Board should defer to the Department's recommendation of all escapement goals pertaining to this watershed, rather than a proposal by the Kenai River Sportfishing Association.

I urge the board to reject Proposal 5.

Submitted By
Phyllis Shirron
Submitted On
11/13/2021 1:11:13 PM
Affiliation
PWS drift permit owner; seine/dungie crewman AK



PC185
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Prposal #6: SUPPORT

I strongly support daily reporting of all people utilizing any fishery; including sport, personal use, and subsistence harvests. It is a logical and reasonable way to collect *reliable* data, which can be a tool for fishery managers and related entities. Up river there is little oversight by authorities, which allows for innocent mistakes or corruption. Furthermore, it has been proven that human memory is faulty, and can lead to inaccurate accounts if experiences are not documented immediately. Therefore, daily reporting is more reliable than a single report at the end of a season. Cellular data and internet are more available than ever before. Immediate reporting will not be inconvenient for any of our user groups. In this technology based society, at a juncture where our salmon stocks have natural and man-made pressures, the ADFG biologists deserve every tool they can get.

Commercial fleets are heavily regulated and immediate reporting is mandatory. The data collected is thorough, precise, and available to any interested party. This is a positive example of how daily reporting is beneficial to our hatcheries, regulatory agencies, the public, and ultimately Alaska's economy. Immediate reporting of any salmon harvested in the Copper River drainage could provide similar benefits with no negative impacts.

I strongly urge the Board to support proposal #6

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 1:41:14 PM

Affiliation

PWS drift permit owner; seine/dungie crewman AK



PC185
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Proposal # 7 SUPPORT

Until recent years, there have not been many guide-services on the Copper. Because of the complicated river system and the nature of Personal Use and Subsistent fisheries in this area, fishermen have traditionally been more self-sufficient and less invasive in the spawning grounds. With guided subsistence charters, the pressure on salmon as well as increased degradation of spawning habitat, is a serious concern. Guided subsistence trips are turning this resource into a commercial venture. Currently there are no commercial regulations on these captains, as their are in other commercial fisheries. Chartered fishing guides receiving fees for guided trips, in a subsistence fishery, is a misuse of the resource. These entities are blatantly taking advantage of a regulatory loophole, while causing damage to salmon runs and habitat. By prohibiting monetary exchange for these services, you will be upholding the constitution's purpose of subsistence fishing, as well as creating a more sustainable future for said fishery.

I strongly urge the Board to support proposal #7

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 1:48:22 PM

Affiliation

PWS drift permit owner; seine/dungie crewman AK



PC185
4 of 31

Proposal #8 SUPPORT

We haven't met our Gulkana brood stock in recent years. We know dipnets are more successful than other methods of catching. Dip nets also have a higher mortality rate upon release. Regulations are in place to protect anadromous streams from other fisheries, and should extend to subsistence fisheries as well. Especially in sensitive areas.

I hope the board will support proposal # 8

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 1:58:42 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
5 of 31

Proposal #9 SUPPORT

Limiting the area for dipnets, to that below the Chitina bridge, will be inconsequential to Alaskans filling our freezers but substantial for salmon trying to successfully spawn above the bridge. Because pressure on the species has increased since statehood, through environment and human aspects, it is our duty as Alaskan residents to limit our take in areas of spawning grounds- especially when escapement goals are not being met. Once the runs have rebounded, the areas can be reassessed. Until then, we should keep dipnets below the bridge.

I would like the Board to support Proposal 9

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 2:10:13 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
6 of 31

Proposal #10 SUPPORT

Dipnetting by boat, with no limitations of allowable methods or depth, allows charter guides and mootorized fishing to target and over-harvest vulnerable fish, which severely damages the population. Dipnetting by moving vessel is an expansion of the fishery. Modern sonar increases the ability to harvest. More over, dipnets can be drug along the bottom and used as a trawl, repeatedly covering the same ground and preventing fish from resting and advancing up river. Traditionally, subsistence and personal use dipnets were not wielded so successfully. Technology and equipment have improved, accessibility has increased, yet regulations have not evolved to reflect these changes.

I would like the Board to support Proposal 10

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 2:19:52 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
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Proposal # 11 Support

Although I would like to see this proposal affect charter operators as well, I am in support of Proposal 11. The area is sensitive habitat for salmon where the fish are near the end of their journey. They are vulnerable once they arrive here. Technology and gear have improved greatly over the years, which increases the success of our fishermen. As number of fishermen and improved gear increases in this area, the regulations must evolve to support a sustainable and healthy salmon stock. It is logical that dipnetters should be stationary in this area of the Copper River Basin to support conservation of the resource.

I would like the Board to support Proposal 11

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 4:15:25 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
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Proposal #14 Support

The health of our Chinook stock should be top priority. Limiting the use of mono and multi filament dip nets to August 15 and later, will promote survival and spawning of chinook salmon. Dipnetters upriver and in spawning grounds do not experience heavy regulations, although the accessibility and technology has increased tremendously. Ammending the allowable materials and gear type would be appropriate.

I'd like to see the Board support proposal 14

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 4:18:50 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
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Proposal # 15 Support

Improvement to gear types and technology have occurred, as well as accessibility to salmon habitat in Copper River. It is logical to amend allowable materials to match increased pressure on these salmon. This proposal was submitted by Copper Basin Fish and Game Advisory Board.

The Board of Fish should support the committee's proposal.

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 4:26:33 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
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Proposal # 17 Support

Local subsistence users are having difficulty catching their harvest since the dip netting has increased along the Copper River. It is established that brood stock has not been achieved since 2014 and there is increased pressure on the salmon stock that correspond with these shortages. It is logical to limit dipnetting to stationary points, and limiting the number of salmon to be harvested per permit. This proposal suggests minimal change. It is reasonable to implement this proposal for conservation and reasonable allocation of the resource.

I want the Board to support proposal 17

Submitted By

Phyllis Shirron

Submitted On

11/13/2021 4:31:16 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
11 of 31

Proposal # 18 OPPOSE

In a time when we are not achieving escapement, and brood stock has not been fulfilled by Gulkana since 2014, it is unreasonable for any user group to request additional area. #18 attempts to expand area into the mark and capture territory. This proposal is an absolute offense.

The Board should absolutely oppose # 18!

Submitted By
Phyllis Shirron
Submitted On
11/13/2021 5:47:01 PM



PC185
12 of 31

Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher

Proposal 19 SUPPORT

This proposal promotes an equal shared burden of conservation amongst user groups of Copper River, toward protecting and supporting spawning salmon stocks, as well as sustaining all future Copper River fisheries. Until 2017 there has been a similar regulation on the books. It was repealed on the premise that the regulation had never been utilized or needed. Since that time, the stocks have declined.

When fish are abundant, we all benefit. When fish returns are low, it is the commercial fleet that loses opportunity and experiences restriction. Up river fisheries have a substantial impact on spawning fish. Yet the commercial fleet bears the burden. Since 2017, the time of repeal, Copper River has experienced multiple instances that this rule would have been a boon to regional biologists. The most recent example is this 2021 season, when the drift fleet experienced a 16 day closure even though all signs showed the run would produce, just later than usual. Ultimately the 2021 in-river goal was exceeded and sockeye escapement met. Shared burden of conservation would have allowed at least one day of commercial fishing, rather than a 16 day closure. The fish tax, fuel usage, food purchases, and all other income generated from a single opener during that time would have greatly benefited the economy. It was lost opportunity for the commercial fleet while up river was unaffected.

Proposal 19 is less restrictive than the original rule, which was removed so recently as the latest Board meeting. Now the rule is needed. It is prudent to pass Proposal 19.

I strongly urge the Board to support proposal 19.

Submitted By
Phyllis Shirron
Submitted On
11/14/2021 1:10:36 AM
Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #20: SUPPORT

This proposal is pragmatic. It brings the Personal Use fishery to a responsible and reasonable number of 15 salmon for a household of one, 30 for a household greater than one, and provides opportunities for more fish if the run is strong. This proposal is another tool of conservation that allows Copper River biologists to appropriately manage the fishery in these times that the salmon runs are struggling. Also, households can sportfish with rods to increase their salmon harvest as needed.

ADFG and Board of Fish are tasked with preserving our salmon stocks through management and regulation. In 2014 the afore mentioned harvest limits were increased to meet those of the Kenai River. Copper River drainage is very different than Kenai, and requires different management strategies. While Copper River fish populations are showing signs of low abundance, the harvest limits should reflect the trend. PU harvests should return to lower limits in order to preserve wild stocks and improve Gulkana hatchery production.

I strongly urge the Board to pass Proposal 20.

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 1:20:56 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
14 of 31

Proposal #21: OPPPOSE

The Personal use fishery provides ample opportunity and large bag limits as it stands. Gulkana has not collected required brood stock in many years. The sonar is installed in mid to late May, once river conditions allow. There is not enough data collected between time of installation and June 1, to support this proposal. No user group should be requesting more time in this drainage until the Chinook escapements are met. I strongly oppose proposal 21.

I strongly urge the Board to reject Prop 21.

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 1:50:26 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #28: OPPOSE

Subsistence and Personal Use permits have different bag limits. Lower river harvest numbers are related to achieving the in-river goal, while up-river harvests are managed on a different scale. Until our chinook escapement are being met consistently, and the health of our other stocks are stabilized, no user group should be requesting higher bag limits.

I would like the Board to oppose Proposition #28

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:00:41 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #29: Oppose

I think the Native Village could fish gillnets throughout the Sound. But I would like NVE to go through Federal channels rather than state regulatory boards. If these subsistence rules change through Board of Fish, it opens the Sound to over-use with this gear type, and potentially increases negative effects on all salmon stocks [in unforeseen ways].

I would like the Board to remain neutral or reject Proposal #29.

Submitted By
Phyllis Shirron
Submitted On
11/14/2021 2:10:06 AM

Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #32: OPPOSE

Watersheds across Alaska are unique, and must be managed individually. This proposal puts the need of the user above the health of the resource. Regulatory boards are suppose to manage to the well being of the resource. I want the sport limits to remain as they are, especially as Copper River salmon stocks are in low abundance. No user group should request increased bag limits at this time.

I would like the Board to reject this proposal

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:15:56 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #32: SUPPORT

If passed, this could decrease predation of salmon, which could positively impact that species, as well as increasing sport fish opportunity.

I support passing proposal #32

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:21:45 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #36: SUPPORT

This proposal provides long term benefits to the Gulkana hatchery, sport fishermen, and ultimately the trout population. Catching trout limits their competition and allows growth. It also increases sporting opportunities while potentially decreasing predation of salmon by these Rainbow Trout.

I hope the Board supports Prop 36

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:30:19 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #38: SUPPORT

If implemented, this proposal will ensure conservation when counts are low. Health and sustainability of the resource should be prioritized over user groups. It is logical that the lower river users and commercial fleet, should not be responsible for the entire burden of conservation. It is practical to restrict all user groups at times of low abundance.

I want the Board to pass Proposal #38

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:35:44 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



PC185
21 of 31

Proposal #39: SUPPORT

This proposal supports salmon habitat and protects sensitive spawning grounds. If this proposal is approved, it will not limit sport fishermen in this area because there is plenty of open and accessible area. Protecting salmon habitat is positive for all user groups!

I would like to see the Board pass Proposal 39

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:39:35 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #40: SUPPORT

This proposal is common sense. It protects a species at one of the most vulnerable and important phases of their life cycle. It was submitted by the Fish and Game Advisory Committee, which should be supported.

The Board should pass Proposal #40

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 2:48:11 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #41: SUPPORT

This proposal emits the word 'madatory' from the management plan, but does NOT remove inside closures. ADFG managers have proven themselves to be conservative and effective. If passed, this proposal will provide area biologists a hint of freedom in weekly management that they currently do not have. It is simply a tool they can utilize if appropriate.

I would like the Board to pass Proposal 41

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 10:48:54 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal # 47: OPPOSE

Interception was a consideration when hatcheries began, and has been consistently monitored over the years. The Valdez fish highlighted in this proposal are always accounted for in PSWAC allocation. The intent of this proposal is already acknowledged and heeded throughout PWS, and managed accordingly, deeming this proposal unnecessary

I would like the Board to reject this proposal.

Submitted By

Phyllis Shirron

Submitted On

11/14/2021 11:11:25 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal # 48: OPPOSE

Proposal 48, submitted by Northwest and Alaska Seine Asspcoation, attempts to limit opportunity for the Drift and Setnet fleets in Eshamy District. The Drift and Set net fleets fish a small portion of Prince William Sound. The districts are set according to species, gear type, and historical run times. Interception is accounted for by hatcheries and ADFG. It is not prudent to limit the gillnet fleets based on the small percentage of pink salmon harvessted, as this proposal is targetting. Furthermore, the fish at the core of this proposal are accounted for in hatchery plans, and PSWAC allocation. Area biologists already manage these districts and runs appropieately. There is no need to ammend the Prince William Sound and Salmon Enhancement Allocation Plan as suggested by Proposal #48

I would like to see the Board oppose Proposal 48.

Submitted By

Phyllis Shirron

Submitted On

11/15/2021 10:50:10 AM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #49: OPPOSE

This proposal submitted by Pioneer Alaskan Fisheries is redundant, and their concerns are addressed in the bylaws of hatcheries and the guiding principles of ADFG fishery management. PWS hatcheries adhere to protocol that prevents contamination of wild stocks. The balance between enhanced and wild stocks are consistently monitored and maintained. Collaboration between hatcheries, ADFG, and other key players in the region ensures that wild salmon are being prioritized and sustained. Fishing fleets in PWS are strictly managed by area biologists. You can see through harvest records and historical data, that the Department is capable of managing fleets to promote the health of our Alaskan salmon populations, while benefiting the economy and balancing needs of all user groups.

The Board should reject Proposal 49

Submitted By
Phyllis Shirron

Submitted On
11/15/2021 11:37:06 AM

Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #50: OPPOSE

The concerns voiced in Proposal 50 are accounted for, deeming it redundant and unnecessary. Wild stocks are prioritized throughout the state, then uniquely managed per specific watershed. When hatcheries began, the protection of wild stocks was written into bylaws. Since the beginning, parameters have been consistently monitored; then amended or maintained as necessary. The production of enhanced salmon is instrumental to the state's economy, as well as our residents' well being. Over time, population and tourism have increased, while gear and technology have improved for all fishing operations. With greater pressure on our salmon, the Department has proven in PWS that they are capable of sustaining healthy stocks while satisfying the needs of the user groups. Maintaining proper balance between enhanced and wild stocks is an in-depth process that involves many players; all of which are succeeding by utilizing science, regulations, and the ADFG guiding principles.

I strongly urge the Board to reject Proposal 50

Submitted By
Phyllis Shirron

Submitted On
11/15/2021 11:51:35 AM

Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #51: OPPOSE

Proposals 50-53 are referencing the same concerns per individual hatchery. Wild stocks are prioritized throughout the state. Each region is unique and individually managed. Straying, interception and overlap are accounted for during the process. The requests in Prop 51 are currently addressed, deeming this proposal redundant and unnecessary.

When hatcheries began, the protection of wild stocks was written into bylaws. Since the beginning, those parameters have been consistently monitored; then amended or maintained as necessary. The production of enhanced salmon is instrumental to the state's economy, as well as our residents' well being. Over time, population and tourism have increased, while gear and technology have improved for all fishing operations. Maintaining proper balance between enhanced and wild stocks is an in depth process that involves many players; all of which are succeeding by utilizing science, regulations, and the ADFG guiding principles. With greater pressure on our salmon, the Department has proven that they are capable of sustaining healthy stocks while satisfying the needs of user groups.

I strongly urge the Board to reject Proposal 51

Submitted By
Phyllis Shirron

Submitted On
11/15/2021 12:15:05 PM

Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #52: OPPOSE

Proposals 50-53 are referencing the same concerns per individual hatchery. Wild stocks are prioritized throughout the state. Each region is unique and individually managed. Straying, interception and overlap are accounted for during the process. The requests in Prop 52 are currently addressed, deeming this proposal redundant and unnecessary.

When hatcheries began, the protection of wild stocks was written into bylaws. Since the beginning, those parameters have been consistently monitored; then amended or maintained as necessary. The production of enhanced salmon is instrumental to the state's economy, as well as our residents' well being. Over time, population and tourism have increased, while gear and technology have improved for all fishing operations. Maintaining proper balance between enhanced and wild stocks is an in depth process that involves many players; all of which are succeeding by utilizing science, regulations, and the ADFG guiding principles. With greater pressure on our salmon, the Department has proven that they are capable of sustaining healthy stocks while satisfying the needs of user groups.

I strongly urge the Board to reject Proposal 52

Submitted By
Phyllis Shirron

Submitted On
11/15/2021 12:16:54 PM

Affiliation
PWS drift permit owner; seine crewman, sport/subsistence fisher



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Proposal #53: OPPOSE

Proposals 50-53 are referencing the same concerns per individual hatchery. Wild stocks are prioritized throughout the state. Each region is unique and individually managed. Straying, interception and overlap are accounted for during the process. The requests in Prop 53 are currently addressed, deeming this proposal redundant and unnecessary.

When hatcheries began, the protection of wild stocks was written into bylaws. Since the beginning, those parameters have been consistently monitored; then amended or maintained as necessary. The production of enhanced salmon is instrumental to the state's economy, as well as our residents' well being. Over time, population and tourism have increased, while gear and technology have improved for all fishing operations. Maintaining proper balance between enhanced and wild stocks is an in depth process that involves many players; all of which are succeeding by utilizing science, regulations, and the ADFG guiding principles. With greater pressure on our salmon, the Department has proven that they are capable of sustaining healthy stocks while satisfying the needs of user groups.

I strongly urge the Board to reject Proposal 53

Submitted By

Phyllis Shirron

Submitted On

11/15/2021 4:15:12 PM

Affiliation

PWS drift permit owner; seine crewman, sport/subsistence fisher

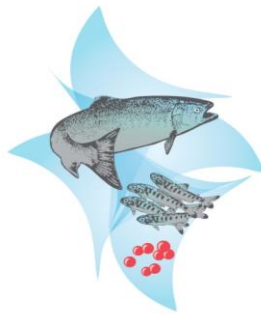


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Proposal 54: OPPOSE

As the previous proposals, this one is already accounted for in the bylaws and management plan of PWS. The proposal is unnecessary because the wild stocks are top priority. Habitat, contamination, and sustainability of wild runs are monitored and protected. To reduce chum production by 24% is an excessive change that create negative impacts for the hatcheries, fishing fleets, and state economy.

Please reject proposal 54.



Prince William Sound
Aquaculture Corporation
DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD



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November 13, 2021

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

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC opposes Proposals 49, 50, 51, 52, and 53

Dear Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization, employing 53 full-time staff members and 75 seasonal workers and operating an annual budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 750 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors.

Proposals 49-53 are interrelated and similar. These proposals intend to reduce hatchery production through board action by amending Prince William Sound (PWS) hatchery regulations that govern hatchery management plans. **PWSAC opposes proposals 49-53** on the basis that they are requesting unnecessary changes to management plans and attempting to place specific criteria into regulation that is not based on science or proven to be necessary. The current guidelines and process has served Alaska well for over 40 years.

PWSAC works collaboratively with the ADF&G fisheries managers and scientists annually regarding the impacts of salmon enhancement through the Regional Planning Team (RPT), Annual Management Plans, and the permitting process established in regulation. Hatchery location and interactions with other salmon species are carefully considered annually as new information is available. Regular and continued periodic evaluation is conducted for consistency with statewide policies and regulations, focusing on the protection of naturally spawning wild salmon, genetics, fish health, and disease. This has been and remains an enviable model of sustainable fisheries unparalleled anywhere in the world.

PWSAC production has been relatively stable since 1990, 30+ years. While salmon markets and ocean productivity have varied during this period, from 2012 – 2017, PWSAC provided an annual average ex-vessel value of \$49 million, according to a 2018 McDowell Group report. That equates to a \$122 million annual average wholesale value and \$192 million annual average total economic output to commercial, sport, and subsistence users within PWS. Salmon harvests are an important economic engine for Alaska and must be protected for future generations.

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

P.O. Box 1110 · Cordova, Alaska 99571
Phone 907-551-1111 · Fax 907-551-0000

www.pwsac.com



In the last 10 years, PWS has seen some of the largest wild returns on record. The top five natural pink returns were 23.4 million in 2021, 18.3 million in 2019, 22.4 million in 2017, 31.6 million in 2016, and 22.2 million in 2013. This supports that there has been no demonstrable harm to wild salmon stocks since hatchery inception, contrary to what the author of these proposals indicates, and illustrates the hatcheries supplementing, but not displacing, the sustained yield of PWS wild salmon stocks. Further, recent genetics work as part of the Alaska Salmon Hatchery Program (AHRP) reported in a March 2021 project synopsis, "Population structure in PWS is comparable to structure found in wild pink salmon elsewhere in its geographic range."

Salmon and nature are not static; attempting to establish fixed criteria will not be in the best interest of the public. Salmon straying, or pioneering, is an important natural behavior and is most prevalent in pink salmon. We are now experiencing this with pink salmon colonizing rivers and streams in Norton Sound and the North Slope. The scientific community has yet to establish definitive stray rate thresholds. The department continuously reviews the most current available science and has the tools in place to incorporate any changes necessary so that Alaska's fisheries and hatchery production are managed on a sustained yield basis per existing regulations.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program (AHRP) and supports the current laws and regulations that guide it. Over the last 40 years, the Alaska Salmon Hatchery Program has been a huge success in helping rebuild Alaska's salmon stocks from the historic lows of the 1970's. The program has provided hundreds of millions of dollars in economic activity across the state since its inception and fed billions of people across the globe. Until AHRP study results are finalized, it would be premature and harmful to consider curtailing hatchery production. Doing so will disrupt families, communities, and economies not just in PWS but across the entire state.

PWSAC respectfully **opposes proposals 49-53**. We look forward to working with the Board of Fish members to answer any questions they have and help inform the public process during the meeting.

Sincerely,

Geoff Clark
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

P.O. Box 1110 · Cordova, Alaska 99571
Phone 907.554.1111 · Fax 907.554.0000

www.pwsac.com



November 13, 2021

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

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC opposes Proposals 54 & 55

Dear Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization, employing 53 full-time staff members and 75 seasonal workers and operating an annual budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 750 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors.

PWSAC opposes proposals 54 and 55. These proposals have been proposed during previous Board of Fish meetings and have not been passed. The proposals are not based on any scientific information and are meant to inflict financial harm on Alaska's coastal communities, commercial fishing industry, sport fishing industry, subsistence fishing, and hatchery operators.

The author cites the document known as "Joint Protocol on Salmon Enhancement #2002-FB-215". This document does not state anywhere that a 24% decrease in the chum salmon program has been agreed upon and is to be implement, as stated in Proposal 54. Further, the document does not reference a 25% decrease, as stated in Proposal 55. In previous meetings regarding the Alaska Hatchery Program, hatchery operators supported the Board of Fisheries implementing the Joint Protocol on Salmon Enhancement: which it has done since 2019. We support the board receiving regular updates on what is happening with salmon enhancement in Alaska, how it supports Alaska's fisheries, and ways we can continue to improve the program.

The author asserts the over-production of hatchery pink salmon. Ruggerone and Irvine (2018), Knudsen (2015), and Haught et al (2017) provides the best available data on numbers and biomass of hatchery and natural origin adult (mature) and juvenile (immature) salmon. PWS pink production has been relatively stable since 1990, 30+ years. Estimated from these studies for the years 1990-2015, PWS adult and juvenile hatchery pink salmon biomass averages 7.32% of the total pink salmon biomass in the North Pacific Ocean. When the adult and juvenile chum and sockeye salmon biomass are included for the same timeframe, PWS adult and juvenile hatchery pink salmon biomass is estimated to average 1.62% of the annual total biomass for these three salmon species in the North Pacific Ocean.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program and supports the current laws and regulations that guide it. Over the last 40 years the Alaska Salmon Hatchery Program has been a huge success in helping rebuild Alaska's salmon stocks from the historic lows of the 1970s.

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P.O. Box 20011 · P.O. Box 2000

www.pwsac.com



The program has provided hundreds of millions of dollars in economic activity across the state since its inception and fed billions of people across our globe.

PWSAC respectfully **opposes proposals 54 and 55**. We look forward to working with Board of Fish members to answer any questions they have and help inform the public process during the meeting.

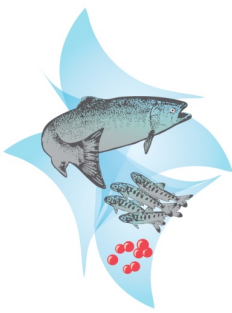
Sincerely,

Geoff Clark
General Manager/CEO

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November 15, 2021

Alaska Board of Fisheries
1255 W. 8th Street
P.O. Box 115526
Juneau, AK 99811-5526

Members of the Board of Fisheries:

I am sharing a legal memorandum produced by the firm of Ashburn & Mason P.C. in Anchorage. The memorandum was produced in July 2018 to answer questions about the Alaska hatchery program and related questions on Board processes and jurisdiction or authority, hatchery production regulation, harvest and permit management, and more. The upcoming Board of Fisheries meeting in Cordova will consider Proposals 49 – 55. This legal memorandum details many contextual issues and precedents that the Board will consider and discuss while deliberating Proposals 49 – 55. The Board has received this memorandum in years past, but with new members recently added to the Board, I wish to submit this document to provide additional background to the Board for consideration in advance to the discussions that will take place in Cordova from November 30 – December 6, 2021.

Please don't hesitate to contact me with questions.

Respectfully,

Geoff Clark
General Manager
Prince William Sound Aquaculture Association

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

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ASHBURN & MASON P.C.

LAWYERS

LAURA C. DULIC • MATTHEW T. FINDLEY • EVA R. GARDNER • REBECCA E. LIPSON
DONALD W. MCCLINTOCK III • JEFFREY W. ROBINSON • THOMAS V. WANG
OF COUNSEL JULIAN L. MASON III • A. WILLIAM SAUPE

July 9, 2018

VIA EMAIL: dfg.bof.comments@alaska.gov

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

Re: **Public Comments of Ashburn & Mason, P.C., Counsel for Prince William Sound Aquaculture Corporation In Opposition To May 16, 2018 KRSA et al. Emergency Petition Regarding VFDA Hatchery Production (Comment Due Date July 9, 2018).**

Dear Chairman Jensen and Members of the Board of Fisheries,

Ashburn & Mason, P.C., counsel to Prince William Sound Aquaculture Corporation (“PWSAC”), submits the following opposition and public comments to the above-referenced petition:

INTRODUCTION

Petitioners ask the Board to declare an emergency and reduce the current permitted salmon production at Valdez Fisheries Development Association’s (“VFDA”) Salmon Gulch Hatchery. The Department of Fish and Game (the “Department”) granted VFDA’s production permit in 2014, which provided for gradual production increases on a yearly basis. In year three of the permit, Petitioners now ask the Board to declare an



ASHBURN & MASON^{P.C.}

Ashburn & Mason, Public Comments in Opposition to KSRA et al. Emergency Petition
Page 2
July 9, 2018

“emergency” and essentially veto this permit without engaging in the notice and comment rulemaking required by statute. The Petition establishes no “emergency,” nor does the Board of Fisheries (“Board”) have the statutory authority to veto the Department’s prior permit decision regarding salmon production.

A permit granted four years ago does not qualify as an “emergency” under any definition of the word, let alone the strict definition governing emergency petitions under Alaska law. By statute, true regulatory emergencies are held to a minimum and rarely found.¹ The reason for this strict standard is that enacting regulations outside of the notice and comment rulemaking procedures mandated by the Administrative Procedure Act is strongly disfavored. Here, establishing an emergency requires “unforeseen” and “unexpected” threats against fish and game resources.² VFDA’s long-standing permit is neither unforeseen nor unexpected. The fact that Petitioners chose not to engage in the public process leading to the permit grant does not make the permit “unforeseen.”

Even if there were an emergency, the Board lacks statutory authority to grant the relief requested by Petitioners. As set forth in detail below, the legislature invested the Department with the legal duty to oversee all aspects of hatchery creation, operation, and

¹ AS 44.62.270.

² 5 AAC 96.625(f).



ASHBURN & MASON P.C.

Ashburn & Mason, Public Comments in Opposition to KSRA et al. Emergency Petition
Page 3
July 9, 2018

production,³ including but not limited to how many fish hatchery operators are allowed to incubate and release each year. By statute, the Department, not the Board, regulates hatchery activities that directly impact production levels, such as the harvest of eggs from hatchery broodstock.⁴ The Board, on the other hand, is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve, including commercial, personal use, sport, subsistence, and hatchery cost recovery.⁵ The Department and the Board have respected and abided by this division of labor and authority for over 30 years. To our knowledge, the Board has never before attempted to second guess a decision by the Department to authorize a specific level of egg take in a hatchery permit.

The Petition seeks to disrupt this well-established division of authority by interjecting the Board into the realm of production management. Specifically, the Petition asks the Board to micro-manage egg take levels from hatchery broodstock, which is squarely within the Department's sphere of authority and expertise, and outside the Board's jurisdiction over allocation of harvest levels. The Petition's only ground for this change in the *status quo* is a narrow statutory subsection, AS 16.10.440(b), addressing

³ AS 16.10.400-.470; 5 ACC 40.005-.990.

⁴ AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5ACC 40.840.

⁵ *E.g.*, AS 16.05.251.



ASHBURN & MASON^{P.C.}

Ashburn & Mason, Public Comments in Opposition to KSRA et al. Emergency Petition
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July 9, 2018

the Board's authority to amend hatchery permits regarding the "source and number of salmon eggs." This provision cannot bear the weight Petitioners place on it.

When this statute was enacted in 1979, the legislative's reference to "the source and number of salmon eggs" almost certainly referred to the collection of *wild* salmon eggs, before the hatcheries' cost recovery operations had been fully established. Back in 1979, collection of salmon eggs from wild stocks involved the harvest of wild salmon still swimming out in the ocean. In those early days, egg take had a potential to affect the Board's allocative decisions. By contrast, hatchery egg take today is conducted entirely from returning hatchery broodstock, captured in terminal harvest areas, not out in the Sound, with little or no allocative implications.

Even if the statute could be construed to apply to eggs recovered from returning hatchery broodstock, it is an insufficient legal basis for disrupting the Department's comprehensive regulatory regime, which includes hatchery production planning and detailed permitting requirements. Again, the Board has jurisdiction over harvest levels, and the Department has jurisdiction over all aspects of hatchery production, including egg take levels.⁶

⁶ *E.g.*, AS 16.10.445, granting the Department exclusive authority over "the source and number of salmon eggs taken" by hatchery operators.



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The Petition is also premature. The potential effects of hatchery fish straying into wild salmon streams, which is the stated impetus for the Petition, have been closely watched by the Department's biologists over the years. These effects are now the subject of an ongoing, in-depth scientific study. Until the study results are known, it is premature to consider curtailment of hatchery production that has already been permitted by the Department. Further, the Board has already stated its intent to address hatchery issues during its regular fall meeting cycle. These important issues can be addressed at that time where there is full opportunity for public participation and comment.

ABOUT ASHBURN & MASON AND PWSAC

Ashburn and Mason is submitting these comments, which focus on the relevant statutes, regulations, and established administrative practice, as a supplement to the comments submitted directly by the Prince William Sound Aquaculture Corporation ("PWSAC"). Ashburn & Mason has represented PWSAC since its creation in 1974. Our firm worked closely with PWSAC's visionary founders in the legislative process that resulted in the creation of the private nonprofit hatcheries ("PNPs") regional aquaculture associations, now codified at AS 16.10.375, *et. seq.*

PWSAC's founders were commercial fishers and community leaders who were responding to repeated wild salmon run failures, and the resulting economic distress



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throughout the Prince William Sound region in the early 1970s. Working together, the fishermen, local community representatives, the Department, and key legislators developed an innovative legal framework for the creation and operation of the state's PNPs and regional aquaculture associations.

Over the past 40-plus years, the statewide hatchery system has been a resounding success, and is an integral part of Alaska's world class sustainable fisheries. Alaska's hatcheries have generated tens of millions of dollars of economic benefit every year spread across all user groups, supplementing, but not displacing, the sustained yield of Alaska's wild salmon stocks. In fact, all of PWSACs hatcheries were started with salmon eggs collected originally from local wild stocks. The genetics of all Prince William Sound hatchery fish are therefore traceable back to local streams.

DISCUSSION

I. NO EMERGENCY EXISTS TO JUSTIFY THE PETITION TO RESTRICT VFDA'S PERMITTED EGG TAKE

By statute, true regulatory emergencies, which allow the Board to issue regulation without public notice and comment, are held to a minimum and rarely found.⁷ This is because public notice and comment are essential to the fairness and transparency of

⁷ AS 44.62.270.



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regulatory rulemaking in Alaska. The explicit state policy against the adoption of emergency regulations is so fundamental to the function of regulatory rule-making that it is codified in the Administrative Procedure Act.⁸ The Commissioner's decision to deny the emergency Petition reflects this well-established policy and decades of Alaska law and regulation, and must be respected.

The Petition does not present an emergency. Rather, it challenges a permit granted several years ago. The narrow exception for adoption of emergency regulations is limited to "unforeseen" and "unexpected" threats against fish and game resources.⁹ These threats must be so imminent that regulatory intervention cannot wait for the usual notice and comment process under the Administrative Procedure Act.¹⁰ For example, the Board adopted an emergency regulation to reorganize the Chignik fishery in 2005 when the Supreme Court issued a decision invalidating the previous fishery rules just six weeks before the season was slated to open.¹¹ The Superior Court agreed that the timing of the Supreme Court's decision created a legitimate emergency because no one could

⁸ *Id.*

⁹ 5 AAC 96.625(f).

¹⁰ 5 AAC 96.625(f).

¹¹ As referenced *infra.* at 3-4, the Commissioner currently has standing authority to review petitions for emergency regulation. See, 2015-277-FB. Prior to the adoption of this policy in 2015, the Board retained the authority to review petitions for emergency regulation.



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reasonably rely on when the Supreme Court would issue its decision, or what that decision would be. In addition to the “unexpected” and “unforeseen” nature of the Supreme Court’s decision, the timing also created a sense of imminence. With less than six weeks before the fishing season opened, the Board “had to act quickly...because it had to have something in place for the June opening.”¹²

Here, the Petition fails to demonstrate how VFDA’s long-standing permit, or the current conditions in the Sound, present an unexpected or unforeseen situation threatening the salmon fisheries. No acute biological or environmental event has impacted the Sound or Cook Inlet in recent months, creating an unpredictable threat. Rather, the purported justification for an emergency petition is an alleged trend, observed over the last several *years*. There is no reason why the proposed Board action could not have been presented a year ago or, more to the point, why it could not wait until the next regularly scheduled Board meeting, which will provide a fuller and fairer opportunity for interested parties and members of the public to comment and participate in the process.

In short, the Commissioner properly exercised his authority under AS 16.05.270 and 2015-277-FB to determine that the Petition failed to present an emergency under the

¹² See, *State of Alaska, Alaska Bd. of Fisheries v. Grunert*, 139 P.3d 1226, 1241 (Alaska 2006).



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Administrative Procedure Act. For the reasons explained in the Commissioner's June 14, 2018 letter to Petitioners, emergency action is unwarranted under these circumstances.

II. THE BOARD DOES NOT HAVE VETO AUTHORITY OVER HATCHERY PRODUCTION PERMITS

A. The Commissioner Has Primary Authority Over Hatchery Permitting and All Hatchery Operations

1. History and Purpose of the Hatchery Program

The desire of Alaskans to manage their abundant salmon fisheries was a driving force behind Alaska Statehood.¹³ The importance of protecting and developing natural resources such as salmon is embedded in the Alaska Constitution, which directs the legislature to “provide for the utilization, development, and conservation of all natural

¹³ See, e.g., *Pullen v. Ulmer*, 923 P.2d 54, 57 n. 5 (Alaska 1996); Alaska Legislative Affairs Agency, *Alaska's Constitution: A Citizen's Guide* (4th ed. 2002) at http://w3.legis.state.ak.us/docs/pdf/citizens_guide.pdf (Many Alaskans concluded “that the notion of the federal government's superior vigilance as a trustee of the public interest was really a cloak for the institutional interests of bureaucrats and the economic interests of nonresident corporations exploiting those resources (principally Seattle and San Francisco salmon canning companies).”); HOUSE COMM. ON INTERIOR AND INSULAR AFFAIRS, *Act Providing for the Admission of the State of Alaska into the Union of 1957*, H.R. REP. No 85-624 (1958) (The Statehood Act “will enable Alaska to achieve full equality with existing States, not only in a technical juridical sense, but in practical economic terms as well. It does this by making the new State master in fact of most of the natural resources within its boundaries”); Univ. of Alaska Anchorage, Institute for Social and Economic Research, *Salmon Fish Traps in Alaska* (1999), at 14, at <http://www.iser.uaa.alaska.edu/publications/fishrep/fishtrap.pdf> (“Alaska political entrepreneurs used the [fish] trap issue to rally the citizens of the territory around the quest for statehood.”).



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resources belonging to the State, including land and waters.” It also requires the legislature to make decisions that “provide for the maximum benefit of its people.”¹⁴ The Alaska Constitution proclaims that “fish, wildlife, and waters are reserved to the people for common use,”¹⁵ and dictates that “Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.”¹⁶ Further, the Constitution expressly references the goal of “promot[ing] the efficient development of aquaculture in the State,” and protecting Alaska’s economy from outside interests:¹⁷

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood *and to promote the efficient development of aquaculture in the State.*

By the early 1970s, salmon runs were in steep decline throughout Alaska. In Prince William Sound, seining did not open at all in 1972 and 1974 due to dangerously

¹⁴ ALASKA CONST. art. VIII, § 2.

¹⁵ ALASKA CONST. art. VIII, § 3.

¹⁶ ALASKA CONST. art. VIII, § 4.

¹⁷ ALASKA CONST. art. VIII, § 15. The Constitution has since been amended to provide for the limited entry permit system now in place, *See infra* n. 7, but the reference to promoting the “efficient development of aquaculture” remains unchanged.



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low wild stock returns. In response, the State of Alaska resolved to restore the salmon fisheries. A constitutional amendment provided the basis for limited entry legislation for commercial fisheries,¹⁸ and the state hatchery program was initiated through the creation of the Fisheries Rehabilitation & Enhancement Division (FRED).¹⁹

Under AS 16.05.020, the Commissioner must “manage, protect, maintain, *improve*, and *extend* the fish, game ... of the state in the interest of the economy and general well-being of the State.” The Department is further required to: “develop and continually maintain a comprehensive, coordinated state plan for the orderly present and long-range rehabilitation, *enhancement*, and development of all aspects of the state’s fisheries for the perpetual use, benefit, and enjoyment of all citizens” and “through rehabilitation, *enhancement*, and development programs do all things necessary to ensure perpetual *and*

¹⁸ AS 16.43.400 *et seq.* Alaska’s limited entry fishery essentially provides that only permit holders may engage in commercial fishing. The granting of these permits, and the management of the commercial fisheries, are tightly regulated by numerous state agencies including the State Commercial Fisheries Entry Commission (CFEC), the Alaska Department of Fish & Game (ADF&G), and the Board of Fisheries (BOF). *See generally Johns v. CFEC*, 758 P.2d 1256, 1263 (Alaska 1988) (“The Limited Entry Act has two purposes: enabling fishermen to receive adequate remuneration and conserving the fishery.”).

¹⁹ AS 16.05.092. As explained more fully below, FRED no longer exists as a distinct division within the Department. However, the operation of most or all of the original hatcheries owned and operated by FRED has been transferred to the regional aquaculture associations, under long-term professional services agreements. PWSAC, for example, currently operates the Cannery Creek, Main Bay, and Gulkana Hatcheries, all of which were constructed and initially operated as FRED hatcheries in the early 1970s.



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increasing production and use of the food resources of state waters and continental shelf areas.”²⁰ Similarly, the Department is required generally to “manage, protect, maintain, *improve, and extend* the fish, game and aquatic plant resources of the state in the interest of the economy and the general well-being of the state.”²¹ The Department is also generally charged to do everything possible to assist with hatchery operations.²²

In addition, the legislature created the Fisheries Enhancement Revolving Loan Fund to promote the enhancement of Alaska’s fisheries by, among other things, providing long-term, low-interest loans for hatchery planning, construction, and operation.²³ PWSAC has received significant support from this program over the years, particularly for capital investments.

In 1974, the FRED state-owned and managed hatchery program was expanded to include private ownership of salmon hatcheries with the passage of the Private Non-Profit (PNP) Hatchery Act.²⁴ The Act stated that its purpose was to “authorize the private ownership of salmon hatcheries by qualified non-profit corporations for the purposes of

²⁰ AS 16.05.092(3) (emphasis added).

²¹ AS 16.05.020(2) (emphasis added).

²² AS 16.10.443.

²³ AS 16.10.500-.560; *see generally* Alaska Division of Investments, “Fisheries Enhancement Revolving Loan Fund Program Overview,” April 2007 at <http://www.commerce.state.ak.us/investments/pdf/FEOver07.pdf>.

²⁴ These provisions are now codified at AS 16.10.375 *et seq.*



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contributing, by artificial means, to the rehabilitation of the State's depleted and depressed salmon fishery." Further, as noted above, a separate fisheries enhancement loan program was created in 1976 to provide state financing for nonprofit hatcheries.²⁵

Over time, the State has transferred operation of some of the FRED hatcheries to other entities, including the nonprofit hatcheries operated by the regional aquaculture associations, concluding that it would be more cost-effective for these hatcheries to be operated by the regional associations. The legislature specifically authorized the subcontracting of state hatcheries in 1988,²⁶ acknowledging that after 17 years of the State planning, building and operating hatcheries, Alaska sought an even more efficient way of ensuring a healthy, robust, and sustainable salmon fishery.²⁷

²⁵ AS 16.10.500 *et seq.*; see also *State Commercial Fisheries Entry Comm'n v. Carlson*, 65 P.3d 851 (Alaska 2003) ("The state operates a revolving loan fund to support investments in developing and operating fish hatcheries and other fish enhancement projects.").

²⁶ AS 16.10.480.

²⁷ Alaska's partnership with the nonprofit hatcheries is unique. Almost all states operate hatcheries of some kind (salmon, trout, walleye, catfish, etc.), but no state operates a hatchery program like Alaska's, and no state works with private nonprofit entities to assist the state government in its hatchery programs. By way of example, California has 21 state hatcheries (<http://www.dfg.ca.gov/fish/Hatcheries/HatList.asp>), Oregon has 33 state hatcheries (<http://www.dfw.state.or.us/fish/hatchery/>), and Washington has 91 state hatcheries (<http://wdfw.wa.gov/hat/facility.htm>), and all of these hatcheries are operated by the government.



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Alaska law provides that the hatcheries may only be non-profit.²⁸ By design, the hatcheries are allowed to recover operating and capital expenses, as well as costs for research and development and expansion of the production system, including wild stock rehabilitation work.²⁹ The system is designed to provide benefits to the common property resource users. The nonprofit regional aquaculture associations have no stock-holders, owners, or members. Today, five regional aquaculture associations, from Southeast Alaska to Kodiak, including PWSAC, produce hatchery salmon for common property fisheries.

Thus, the Alaska Constitution, combined with numerous statutes, including those creating the Department of Fish and Game,³⁰ the Limited Entry Act,³¹ the Private Non-Profit Hatcheries Act,³² and the Fisheries Enhancement Revolving Loan Fund,³³ together

²⁸ AS 16.10.380.

²⁹ AS 16.10.455.

³⁰ AS 16.05.010, *et seq.*; *see also* 5 AAC 40.100-.990.

³¹ AS 16.43.400 *et seq.* Alaska's limited entry fishery essentially provides that only permit holders may engage in commercial fishing. The granting of these permits, and the management of the commercial fisheries, are tightly regulated by numerous state agencies including the State Commercial Fisheries Entry Commission, the Alaska Department of Fish & Game (ADF&G), and the Board of Fisheries (BOF). *See generally Johns v. CFEC*, 758 P.2d 1256, 1263 (Alaska 1988) ("The Limited Entry Act has two purposes: enabling fishermen to receive adequate remuneration and conserving the fishery.").

³² AS 16.10.375-480.

³³ AS 16.10.500-.560.



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demonstrate a strong and long-standing state policy in Alaska of promoting hatchery development for the purpose of enhancing and ensuring the long-term vitality of Alaska's fisheries.

2. The Department Strictly Regulates All Aspects of Hatchery Creation, Operation, and Production

The Alaska Department of Fish and Game has been charged by the Alaska legislature with final authority over how many fish hatchery operations are allowed to incubate and release each year,³⁴ and to regulate all other details of hatchery operation.³⁵

Pursuant to AS 16.10.375, the Commissioner must designate regions of the state for salmon production and develop a comprehensive salmon plan for each region through teams consisting of Department personnel and nonprofit regional associations of user groups. The Commissioner also has the task of classifying an anadromous fish stream as suitable for enhancement purposes before issuing a permit for a hatchery on that stream. As 16.10.400(f).

Of particular relevance to the issue presently before the Board, AS 16.10.400(g) requires a determination by the Commissioner that a hatchery would result in substantial public benefits and would not jeopardize natural stocks. The statutes also require the

³⁴ AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5 AAC 40.840.

³⁵ AS 16.10.400-.470; 5 AAC 40.005-.990.



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Department to conduct public hearings near the proposed hatcheries, and to consider comments offered by the public at the hearings before issuance of a permit.³⁶

All state hatcheries are operated pursuant to a permit issued by the Department.³⁷ Standard permit conditions include: (1) provisions that eggs used for broodstock come from a source approved by the Department;³⁸ (2) no placement of salmon eggs or resulting fry into waters of the state except as designated in the permit; (3) restrictions on the sale of eggs or resulting fry; (4) no release of salmon before department inspection and approval; (5) destruction of diseased salmon; (6) departmental control over where salmon are harvested by hatchery operators; and (7) hatchery location to prevent commingling with wild stocks.³⁹

Further, there is an intricate system of basic and annual hatchery plans that are reviewed annually by the Department and provide for performance reviews, and in

³⁶ AS 16.10.410.

³⁷ AS 16.10.400; 16.40.100-.199; 5 AAC 40.110-.240.

³⁸ AS 16.10.445. This requirement is related to regulations regarding fish transport permitting. *See* 5 AAC 41.001-.100. These regulations provide that no person may transport, possess, export from the state, or release not the waters of the state any live fish unless that person holds a fish transport permit issued by the Commissioner.

³⁹ *See generally* McGee, *Salmon Hatcheries in Alaska – Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks*, Published for 2004 American Fisheries Society Symposium, at 327.



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appropriate cases, permit alterations.⁴⁰ The basic management plans include a complete description of the facility, including the special harvest area, broodstock development schedules, and description of broodstock and hatchery stock management.⁴¹

Year-to-year hatchery production is regulated through the annual management plans (AMPs) approved and adopted by the Department. For example, each year, PWSAC and the other PNPs across the state work with the Department, which ultimately formulates an AMP for each hatchery. That plan, among other things, determines the number of eggs the hatchery will collect, how the eggs will be collected, the number of fish it will incubate, and how many fish will be released from the hatchery.⁴² The AMP also addresses how PNPs will conduct their cost recovery harvest at each hatchery and addresses other specifics of hatchery operation.⁴³

3. The Board's Proper Role is to Allocate Harvest, Not to Override the Department's Permitting and Production Decisions

⁴⁰ 5 AAC 40.800-990. As noted above, there is also an extensive Regional Comprehensive Planning Program established under AS 16.10.375 and 5 AAC 40.300-.370, with full public participation. This process creates Regional Planning Teams who are charged to “prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and supplement natural production . . .” 5 AAC 40.340.

⁴¹ *See generally* McGee, at 329.

⁴² 5 AAC 40.840.

⁴³ McGee, at 329.



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The Board of Fisheries is established by AS 16.05.221, “for purposes of the conservation and development of the fishery resources of the state.”⁴⁴ In general terms, the Board’s duties complement those performed by the Department. While it has broad statutory authority, the Board has historically focused on allocation of fisheries resources between and among the various user groups and gear types. For example, under AS 16.05.251(a) the Board has the power to set time, area, and methods and means limitations on the taking of fish. Under AS 16.05.251(a)(3), the Board also establishes quotas, bag limits, and harvest levels. To the best of our knowledge, however, the Board has always deferred to the Department’s expertise and experience with respect to the detailed management of hatchery permitting and production levels.

B. The Board Cannot Override Annual Hatchery Production Permits Issued by the Department

Petitioners contend that AS 16.10.440(b) grants the Board the authority to upend the Department’s carefully constructed regulatory framework governing hatchery

⁴⁴ AS 16.05.221.



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production.⁴⁵ This interpretation of the statute reads it out of context and is inconsistent with its historical origins. Under Alaska law, this statutory provision must be construed in light of the overall statutory scheme governing Alaska's salmon hatcheries,⁴⁶ its legislative history and intent,⁴⁷ and over 40 years of consistent administrative interpretation and practice, during which the Board (to our knowledge) has never

⁴⁵ AS 16.10.440 provides: (a) Fish released into the natural waters of the state by a hatchery operated under AS 16.10.400 - 16.10.470 are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator. (b) The Board of Fisheries may, after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of salmon eggs, the harvest of fish by hatchery operators, and the specific locations designated by the department for harvest. The Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400 - 16.10.470.

⁴⁶ See, e.g. *Monzulla v. Voorhees Concrete Cutting*, 254 P.3d 341, 345 (Alaska 2011), citing *In re Hutchinson's Estate*, 577 P.2d 1074, 1075 (Alaska 1978), where the Supreme Court articulated the doctrine of *in pari materia*: the "established principle of statutory construction that all sections of an act are to be construed together so that all have meaning and no section conflicts with another."

⁴⁷ See, e.g. *Native Village of Elim v. State* 990 P.2d 1, 5 (Alaska 1999), *Kochutin v. State*, 739 P.2d 170, 171 (Alaska 1987) citing *Hammond v. Hoffbeck*, 627 P.2d 1052, 1056 & n. 7 (Alaska 1981).



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attempted to use this statute as the basis for usurping the Department's traditional control over hatchery production.⁴⁸

At the time Section 440(b) was enacted in 1979, the hatchery system was in its infancy. Most hatchery egg take was from wild stocks, not returning hatchery fish, which is how egg take is conducted today. The thinking at the time was that salmon eggs harvested from wild stocks were still a "public resource" while the fish were swimming out in the ocean, and the harvest of wild fish for egg take had allocation implications that could potentially fall within the Board's purview. In contrast, today's egg take procedures are conducted almost exclusively from returning hatchery broodstock that are captured in the special harvest areas directly in front of the hatcheries. At that point, the hatchery salmon cease to be a public resource and their capture and the collection of their eggs have very limited allocative implications. Further, as the Commissioner noted in his January 14, 2018 Memorandum to the Board on the subject of the current Petition, "the

⁴⁸ See e.g. *Marathon Oil Co. v. State, Dep't of Nat. Res.*, 254 P.3d 1078, 1082 (Alaska 2011), *Premiera Blue Cross v. State, Dep't of Commerce, Cmty. & Econ. Dev., Div. of Ins.*, 171 P.3d 1110, 1119 (Alaska 2007), and *Bullock v. State, Dep't of Cmty. & Reg'l Affairs*, 19 P.3d 1209, 1219 (Alaska 2001), where the Alaska Supreme Court held that agency decisions based on "longstanding, consistent and widely known" interpretations of agency expertise should be given "great weight."



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Board's authority over the possession, transport and release of live fish had not been delegated to the department when AS 16.10.440(b) was amended.”⁴⁹

Moreover, the legislative history of Section 440(b) indicates that it was never intended to be used by the Board as back door means of overriding the Department's permitting authority or limiting hatchery production. The Resources Committee's letter of intent on HB 359, which included the language in question, states as follows:

There are three other major changes made by the bill:

- (1) Section 2 of the bill amends AS 16.10.440(a)(b). The amendment clarifies the role of the Board of Fisheries. The role of the Board of Fisheries as envisioned by the original legislation was to regulate the *harvest* of salmon returning to the waters of the state. That role extends to regulating those fish which are returning as a result of releases from natural systems and also from hatchery releases. There are provisions in other specific locations for the harvest of salmon by the hatchery operator for sale, and use of the money from that sale, for the specific purposes as stated in AS 16.10.450. The added language clarifies that the Board of Fisheries may adopt regulations relating to the *harvest* of the fish by hatchery operators at the specifically designated locations. The Board of Fisheries in the past year or two has enacted regulations relating to those harvests for several of the private nonprofit hatcheries in the state.⁵⁰

⁴⁹ Memorandum from Sam Cotton, Commissioner, to John Jensen, Chair, dated January 14, 2018, Re: Emergency Petition to the Alaska Board of Fisheries requesting the Board to reverse a department decision to allow a 20 million increase in the number of pink salmon eggs to be harvested by VFDA in 2018.

⁵⁰ House Journal, March 15, 1979, pp. 601-602 (emphasis added).



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The exclusive reference to regulation of harvest, and the absence of any mention of production controls, corroborates the conclusion that the legislature never intended to authorize the Board to limit hatchery production.

The Board's traditional function has always been to allocate harvests among competing user groups, not to regulate production of fish. This legislative history, with its emphasis on "harvest," is also consistent with PWSAC's long-held belief (apparently shared by the Department) that Section 440(b) was intended to cover egg take from wild salmon streams, not to apply to egg take from returning hatchery fish.

Further corroboration of this conclusion is found in AS 16.10.445(a), which unambiguously requires the Department, not the Board, to "approve the source and number of salmon eggs taken under AS 16.10.400-16.10.470." Additional evidence that the Department, not the Board, is responsible for regulating hatchery egg take can be found in 5 AAC 41.001, *et. seq.* For example, 5ACC 41.005 prohibits the release of hatchery fish without a permit issued by the Commissioner. Regulation of egg take and release of the resulting salmon fry are obviously two sides of the same coin. The regulatory scheme clearly and consistently assigns exclusive responsibility for regulating those two closely related hatchery activities to the Commissioner.



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Given the legislative history, the 30-plus year pattern of administrative interpretation, the anomalous language in Section 440(b) regarding regulations to “amend...the terms of a permit,” and the mandate of Section 445(b), it is quite clear that the Board has little or no role in regulating hatchery production, including but not limited to egg take permit restrictions.

Moreover, regulation of hatchery production by the Board would overlap and almost certainly conflict with the comprehensive and detailed hatchery regulations that are currently in place and operating effectively. As noted above, the Department has a rigorous permitting process for new hatcheries, 5 AAC 40.100-.240. There is an extensive Regional Comprehensive Planning program established under AS 16.10.375 and 5 AAC 40.300-.370, with full public participation. By regulation, the responsibility of the Regional Planning Teams is to “prepare a regional comprehensive salmon plan ... to rehabilitate natural stocks and *supplement* natural production . . .” 5 AAC 40.340 (emphasis added). As mentioned earlier, there is also an intricate system of basic and annual hatchery plans that are reviewed annually by the Department, performance reviews, and, in appropriate cases, permit alterations. 5 AAC 40.800-.900. Production levels are carefully monitored by the Department under these regulations and adjusted if necessary for economic or biological reasons. The Department's statutory authority for



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this intense level of hatchery regulation is quite clear, and there seems to be little room for the Board to insert itself into a very public process that has been working well for many years.

CONCLUSION

Back in the early 1970s, Prince William Sound experienced recurring wild salmon run failures, which caused serious financial distress throughout the region. In response, the framers of the Constitution and the Alaska Legislature took active and far-sighted steps to first establish a state run hatchery system and, shortly thereafter, the private non-profit and regional hatchery regime that has consistently stabilized the runs and enhanced salmon harvests throughout the state since 1976. Overall, Alaska's hatcheries have been a remarkable success and have helped the state's salmon resources to thrive and expand over the past 40 years, creating millions of dollars of positive economic impact, without any demonstrable harm to wild salmon stocks.

From the very beginning, every aspect of Alaska's hatcheries' creation, operation, and production have been closely supervised and regulated by the Department, with harvest area and allocation decisions made by the Board. This division of responsibility has served Alaska well for many years and there is no good reason to abandon it now.

For these reasons, the Board should deny the Petition.



ASHBURN & MASON^{P.C.}

Ashburn & Mason, Public Comments in Opposition to KSRA et al. Emergency Petition
Page 25
July 9, 2018

ASHBURN & MASON, P.C.

A handwritten signature in blue ink, appearing to read "Matthew T. Findley".

Matthew T. Findley

A handwritten signature in blue ink, appearing to read "A. William Saupe".
*for:*A handwritten signature in blue ink, appearing to read "Laura C. Dulic".

Laura C. Dulic



PURSE SEINE VESSEL OWNERS' ASSOCIATION

1900 W Nickerson St., Ste. 320 ■ Seattle, WA 98119 ■ Tel: (206) 283-7733 ■ Fax: (206) 283-7795 ■ www.psvoa.org



PC187
1 of 2

November 10, 2021

VIA E-MAIL

Marit Carlson-Van-Dort, Chair
Alaska Board of Fisheries
P.O. Box 115826
Juneau, AK 99811

Re: Oppose Anti-Salmon Hatchery Proposals 49, 50, 51, 52, 53, 54, and 55

Dear Madam Chair Carlson–Van Dort and Board of Fisheries Members:

The Purse Seine Vessel Owners Association (“PSVOA”) respectfully submits the following comments in opposition to the above-referenced proposals before the Board at the upcoming Prince William Sound finfish meeting in Cordova which seek to dramatically reduce pink and chum salmon hatchery production in Prince William Sound. PSVOA is commercial fishing organization having members that participate in salmon purse seine fishery in Prince William Sound (PWS).

Contrary to some of the misinformation that has been circulated by the anti-hatchery movement, the Alaska hatchery program provides economic and ecological stability to Alaska salmon returns, which fluctuate from year to year. According to a October 2018 report by the McDowell Group, over a six-year period, PWS harvests of hatchery salmon generated \$69 million in ex-vessel value annually.

Proposals 49 - 53

These proposals attempt to completely reshape Alaska’s hatchery program based on unsupported claims that the mixing of wild stocks “is not reasonable and is against the law.” Alaska Department of Fish and Game (ADF&G) has organized a science panel comprised of current and retired scientists from ADF&G, University of Alaska, aquaculture associations, and National Marine Fisheries Service to document the extent and annual variability in straying of hatchery pink salmon in PWS, and to determine the impact, if any, on fitness (productivity) of wild pink salmon stocks due to straying of hatchery pink salmon. This ongoing research is commonly referred to as the “Alaska Hatchery Research Project.”

Each of these proposals would require hatchery operators to reduce pink salmon production when the proportion of hatchery origin pink salmon straying within a stream where wild pink salmon are present exceeds 2%. This “2% rule” is not science-based and is completely unworkable. First, this 2% stray rate is purely arbitrary. There is no scientific evidence that suggests a hatchery stray rate of greater than 2% adversely impacts wild pink salmon populations. Second, the 2% rate does not



correlate to presumed straying rates that occur naturally, nor does it consider the annual variability in straying rates due to environmental conditions. Third, the proposal is completely silent as to how ADF&G could possibly measure the stray rate in every PWS stream where wild pink salmon were present in a timely fashion, or where the funding would come from to undertake such a herculean effort. Moreover, the Board's adoption of any of these proposals would likely apply to all of Alaska's hatcheries throughout the state.

As mentioned above, there is ongoing research on the question of whether straying of hatchery origin pink salmon in PWS adversely impacts wild pink salmon stocks, and to what degree. At the conclusion of the study, the results will be published and peer reviewed. The results and conclusions derived from the study will provide ADF&G with an objective assessment of wild/hatchery pink salmon interactions in PWS. Any action taken by the Board to require reductions in hatchery production at the present time would be premature and not be based on best available science. In sum, PSVOA respectfully requests the Board **reject** Proposals 49 – 53.

Proposals 54 and 55

Proposal 54 seeks to reduce hatchery chum salmon production in PWS to 24% of the production in 2000. Similarly, Proposal 55 seeks to reduce hatchery pink salmon to 25% of the production level in 2000. Both proposals are premised on the theory that increased competition for food in the Gulf of Alaska from hatchery chum and pink salmon is negatively impacting Gulf of Alaska wild salmon stocks. Contrary to the assertions contained in these proposals, there is no evidence demonstrating a cause-and-effect relationship between hatchery production and wild salmon populations. Our current knowledge regarding ocean food abundance, seasonal, annual, and cyclical variability of ocean food abundance, the degree of direct migratory interfacing of salmon stocks and species, as well as a whole host of other variables that impact salmon productivity underscore the fact that the relationship between hatchery production and wild salmon stocks in the Gulf of Alaska is purely speculative at best. Any regulation of PWS salmon hatchery production should be based on best available science rather than pure speculation. Accordingly, PSVOA respectfully requests the Board reject Proposals 54 and 55.

Thank you for your consideration of PSVOA's comments regarding these proposals.

Very truly yours,

/s/ Robert Kehoe

Robert Kehoe, Executive Director
Purse Seine Vessel Owner's Ass'n

Submitted By
Randy Bond
Submitted On
11/15/2021 9:06:29 PM
Affiliation



PC188
1 of 1

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

My family relies on the ability to harvest salmon under a subsistence permit on the Copper River. This proposal would virtually eliminate our fishing. This area feeds our family throughout the year on a single subsistence permit, with responsible harvesting, annually. We take a small count compared to the counts taken by commercial fishing of the same fish population. Fishing that area without a boat would be nearly impossible for anyone who does not have a fish wheel, which our family does not.

A concern was voiced regarding the number of fish reaching the spawning areas. According to a report from Fish and Game, the annual harvest from subsistence is significantly lower than that of commercial or personal use. I believe we are very fortunate to live in a state with subsistence opportunities, which families depend on and I believe they should be protected for all those who depend on a subsistence way of life.

Thank you for your time,

Randy Bond

Submitted By
Raven Cunningham
Submitted On
11/15/2021 5:04:42 PM
Affiliation



PC189
1 of 1

Phone
9074293136
Email
raven.alayna@yahoo.com
Address
po box662
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

PROPOSAL 21: OPPOSE

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

PROPOSAL 40: SUPPORT

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.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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. Salmon fishing IS my livelihood. As a 3rd generation Prince William Sound salmon seiner with my own young children who are just beginning to learn the family trade, this is an incredibly important and personal topic. Our town population doubles in the summer months due to commercial fishing and vacationing sport fishermen. The town economy is incredibly dependent on the salmon of Prince William Sound. Personally this is how I support my family, but on a broader scope, this also keeps our local shops, restaurants, camp grounds, and hotels heavily in business as well. Salmon fishing in Prince William Sound is the reason my family and I live here.

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.

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.

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

Sincerely,



Ray Sutton
raysutt@gmail.com
(907) 255-4986



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 have owned & fished an Area E Gillnet permit for 46 years. I occasionally go out for subsistence fishing & sport fishing. It is my livelihood above all else.

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.

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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,

Richard Schultz
ricschultz907@gmail.com
(907) 253-3146



From: [RICK ALBRECHT](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Attn: Board of Fish Comments for November 30 - December 6, 2021 meetings.
Date: Monday, November 15, 2021 10:53:30 AM

My name is Rick Albrecht and I'm an avid fisherman. I have fished in multiple locations in the lower 48, I have also spent 2 years in New Zealand and fished there, I have fished in multiple areas of Alaska. I have been fishing in the Cordova area since the 1990's. I was finally able to talk my wife in to fish with me in Cordova in the fall of 2015, after that she said "we are coming here every year", she has been up there at least once every year since and we came twice the year. To say we love Cordova would be a huge understatement! We would hate to see any changes to the wonderful Cordova fishing we enjoy.

The one change I would suggest would be only one opener of 24 hours per week for the commercial fishermen, it shuts down the Eyak and Ibeck the day after each opener. So any opener over 24 hours is rough.

I am would like to make some comments for the [Board of Fisheries Meeting: Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish \(except shrimp\)](#): Cordova, November 30 – December 6, and specifically respond to the PRINCE WILLIAM SOUND (INCLUDING UPPER COPPER AND SUSITNA RIVERS) FINFISH AND SHELLFISH (EXCEPT SHRIMP) PROPOSALS 38, 39 and 40.

- PROPOSAL 38 5 AAC 55.023. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area. Establish restrictions in the Copper River Delta coho salmon sport fishery based on the number of days the commercial fishery is closed, as follows: Adopt a trigger to share the burden of conservation between commercial and sport users in the Copper River Delta. New regulatory language to be added under 5 AAC 55.023: (XX) In the Copper River Delta, if the Copper River gillnet fishery is closed for more than seven consecutive days, then catch and release will be prohibited and fishing with bait will be prohibited. If commercial fishing is closed for fourteen consecutive days, then the bag limit will be reduced to one coho, catch and release will be prohibited, and fishing with bait will be prohibited. What is the issue you would like the board to address and why? There are years with weak coho runs, such as fall 2019 when the Copper River coho gillnet fishery was shut down for the entire season due to a weak run. When the commercial fleet sees reduced fishing time and closures in years of low coho abundance and conservation concerns, a trigger for a shared burden of conservation will help to ensure healthy future returns for all user groups. Catch and release is a safe method that if done properly has a very low mortality rate for fish, if fish are dying that is because of improper education amongst the anglers. Perhaps an



online education course in order to get a sport fishing license would be appropriate, **if there was any proof that catch and release was a problem.** I would agree that bait fishing could be a problem on low fish years.

- PROPOSAL 39 5 AAC 55.023. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area. Extend the area closed to sport fishing in Ibeck Creek, as follows: Closing the spawning beds closer to the road system will protect additional spawning and rearing habitat, and protect spawners from additional stress during this critical life stage. Draft regulatory language: 5 AAC 55.023 Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area. Prohibit sport fishing Coho salmon more than $\frac{1}{4}$ of a mile north of the Copper River Highway as follows: (9) Ibeck Creek is closed to sport fishing in the waters upstream from ADF&G regulatory markers located approximately one-quarter ($\frac{1}{4}$) mile [THREE MILES] upstream from the Copper River Highway Bridge; What is the issue you would like the board to address and why? The existing regulation of 3 miles upstream does not adequately protect spawning Coho in this system. Ibeck Creek is the most popular and heavily fished of all the Delta coho runs. Ibeck Creek receives considerable and increasing pressure from coho anglers. It is important to protect the upstream spawning beds and spawning salmon from the stress of being targeted by fishermen. There is considerable fishing area available both below the highway and just above it, and the majority of fishing pressure occurs in these other areas. It is unnecessary to have the spawning areas beyond $\frac{1}{4}$ mile above the highway open to sport fishing as well. It is important to sustain this popular run for continued and sustainable harvest by all user groups into the future. If you have long openers (over 24 hours) or more than one per week the sport fishers need a place to fish where fish are. The areas in question on the Ibeck is one of the few place to find fish after an extended opening or more than one opener per month. Perhaps a compromise and allow catch and release and you could reduce the take limit to 1 in these areas.
- PROPOSAL 40 5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area. Close 18 Mile or Silver Creek to coho salmon fishing August 1 to November 1, as follows: 18 Mile system or Silver creek will be closed to harvest of coho salmon $\frac{1}{4}$ mile above the confluence of Alganic Slough and 18 Mile system from August 1 to November 1. What is the issue you would like the board to address and why? 18 Mile system or Silver Creek lack of spawning coho salmon. This system is very susceptible to harvest of spawning salmon. It is one of the few systems with coho spawning area below the Copper River Highway. Many times the Eyak and Ibeck are too high to fish and you have little or no choices when it comes to places to fish as a sport fisherman I would hate to see this closed. If something has to be done make this area artificial fly or lure only.



Thanks

Rick Albrecht
801-372-3507



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial salmon fisheries of the Prince William Sound Region. I am the Plant Manager at OBI Alitak. Hatcheries in the Prince William Sound region provide beneficial enhancement to sustainable 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.

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,

Rick Crooks
rick.crooks@obiseafoods.com
(425) 287-1999

Submitted By
Rita Spann
Submitted On
11/15/2021 9:32:06 AM
Affiliation
Area E Gillnetter

Phone
907-888-9228
Email
rita.spann@outlook.com
Address
P.O. Box 1513
Cordova, Alaska 99574



PC194
1 of 1

Proposal 5- Oppose

I urge the Board to reject Proposal 5. ADF&G has already established a Sustainable Escapement Goal for Copper River kings based on the existing data. Increasing this goal above ADF&G's recommendation serves no purpose except to arbitrarily limit the commercial fleet's fishing opportunities.

Proposal 6 - Support

I support Proposal 6. Requiring that Copper River sport fisherman report their catch within three days of harvest is a reasonable requirement that would give the ADF&G biologist valuable in-season data to inform management decisions.

Proposal 7-Support

I urge the Board to support Proposal 7. The right to subsistence fish is dearly held by myself and so many Alaskans. Being able to catch fish close to my home to feed my friends and family makes me proud of our state's commitment to sustainable fisheries. Expensive guide outfits charging Alaskans to harvest their fish is not "subsistence" in any sense of the word. I strongly urge the Board to reject the commercialization of Alaskan subsistence fishing.

Proposal 19- Support

I am confident that the sustainability of the Copper River fishery is equally important to all user groups. Setting a low-return trigger to limit the up-river harvest of Copper River salmon on years of low abundance is a common sense way to manage this fishery as a whole. I ask the Board to support this proposal.

Proposal 38 - Support

I encourage the Board to support proposal 38. This is a reasonable effort to share coho conservation efforts between user groups.

Proposal 41 - Support

I support proposal 41. It is simply an effort to eliminate unnecessary language and empower ADF&G to use the most appropriate management tools available for each season's changing circumstances.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 and am a commercial and sport fisherman. Salmon fishing has become my only source of income. I am depending on this to provide my income for several more years.

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,

Robert Bottoms
bottomsupair@gmail.com



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Eagle River, Alaska, and I participate in the subsistence and sport salmon fisheries of the Prince William Sound region through dip net in Copper River, Valdez's sport fishing, and in Whittier. Salmon fishing in the Prince William Sound region provides great recreation and food source.

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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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,

Robert Lagasse
robertfishing135@yahoo.com
(907) 782-7400

Submitted By
Robert Linville
Submitted On
11/13/2021 1:34:59 PM
Affiliation



PC197
1 of 1

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Address
po box 1771
Cordova, Alaska 99574

I would like to write in opposition of proposal 75. This "new" management strategy is not new at all. It relies on the same trawl surveys and inexcusable Th-TI formula to produce biomass estimates and set GHL's. If the Department is confident in the biomass estimates produced by this method and wishes to apply it to their "new" management strategy I would like to know how they could ethically auction off 25% of the 63,000 TH crab produced by this method for their 2020 test fishery. In 2021 they sold 20% of the estimated biomass. Fisheries can only harvest at a 15% level if the estimated biomass of Th is 200,000-300,000 crab.

The methods used by the department to survey and produce biomass estimates are extremely flawed and the department knows it. By implementing this harvest strategy they will ensure that there will never be a commercial fishery and they will be able to auction off this resource for their own profit. The board should understand that when the department executes a test fishery The fishermen that get the bid are the ones who offer the most per pound price to the department of fish and game! Essentially competing for the lowest price to themselves. This is blatantly inappropriate and totally contradicts the departments bylaws and mission statement. Proposal 75 essentially enacts limited entry.....total number of permits 1.

Submitted By
robert k mcdonnell
Submitted On
11/15/2021 8:00:02 PM
Affiliation
fisherman



PC198
1 of 1

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bellingham, Washington 98229

I have been an Alaska salmon fisherman every year since 1974. I support Alaska salmon hatcheries. I have seen first hand how properly run hatcheries can enhance the wellbeing of the costal communities that are supported by fisheries dollars. Hatcheries take the sometimes huge swings in abundance of wild stocks into a more sustainable program for fishermen, proscessors and their communities. Thank you for supporting Alaska Salmon Hatcheries



BEARS DEN CABINS LLC



907 424 7168

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PO BOX 365

Cordova, Alaska

99574

Attn: Jessalyn

AK Dept of Fish & Game

PO Box 115526

Juneau, AK 99811

To Board of Fish Members:

Re: Prince William Sound/Cordova Area Sport & Commercial Fish proposals

I am writing today concerning proposals 38, 39 & 40.

My husband and I have lived and worked in Cordova since 1973. We bought property on the Eyak River in 1982. My husband Skip Jensen, has been a commercial fisherman here since 1973. We started out gill netting for coho salmon in the fall of 1973. Skip sold out of gillnetting in 1995 and has seined in PWS ever since. We built a rental cabin on the Eyak River on our property in 1998.

By 2005 we had 5 sports fishing rental cabins. The coho run on the Eyak has always been more than abundant and we were thrilled to be able to share this experience with many sports fishermen since 1998. However, in the past 5 years, the fish are less and less and we mostly notice this when the commercial gill netters fish close to the mouth of the Eyak River. There used to be 2 openers (12-24 hrs) per week but this last year with the long openers our guests would stay down river nearly all day and barely catch anything. They would come to us and say "The run is over!" I assured them it was not over but that the gill netters were fishing hard and furious- possibly too close and not allowing any fish up river. They had to wait about 2 days and then would get their 3 fish limit per person for the day.

Our return guests have been coming for so many years, however many of them this past 2020 coho season left with hardly any fish. It was very disappointing to see. Our town thrives on all the sports fishermen who flock to Cordova in August and September. Also our locals love to bring their families down river and fish at the nearby Ibeck. It's a great time of year for everyone-there is no reason both sets of fishermen can not get along. We need to respect the virtues of each fishery. We ask you to please reject proposals 38, 39, & 40. It is unfair and looks like a bully on the playground trying to rule it all. There needs to be more information and interaction concerning these proposals. It is wrong to destroy the sportfishing industry which affects many businesses and families here in Cordova. Thank you.

Respectfully, Robin Jensen, Owner-Bears Den Cabins



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 as well as through processing. As a lifetime advocate for the Alaska wild salmon fishery, I hope to see that these resources continue to be managed with legitimate scientific based research and data. The PWS fishery is the lifeblood of our seafood industry and the main source of salmon for the US & international canned and frozen portion markets.

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,

Ron Risher
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(206) 390-5974

Submitted By
Ronald Samber
Submitted On
11/2/2021 7:13:36 PM
Affiliation



PC201
1 of 1

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Regarding proposal 39 to limit fishing on Ibeck from the current limit 3 miles above the road down to 1/4 mile above the road. Please do not do that. In so doing you will ruin the appeal of fishing in Cordova for me and several dozen other like minded people.

I have fished Ibeck every year since 2001. I have met, talked to and I believe I speak for several groups of anglers from all over the country and a few groups from other countries who have visited Cordova to fish Ibeck for 10, 15, and 20 or more years in a row. We share a love fishing Ibeck. For many of us this is the best trip of our year. None of us fish the first half mile of the river. Most of us fish between the first mile and the 3 mile limit. We cherish the opportunity to fish in that incredibly beautiful place and to be able to fish it in relative solitude. The vast majority of those of us that fish the upper 2 miles do not fish with other groups. If one or more people are fishing it is normal for the next group to say howdy, hows the fishin? and move on in search of an unoccupied stretch of river. That will be impossible if you confine us to anything like the first mile of river. You will create a combat fishing atmosphere and in so doing you will cause many of us to abandon our annual Cordova trips. We don't go to Cordova for the fish so much as for the incredible fishing experience. The thrill of catching fresh Silvers on a fly rod. The scenery. The opportunity to fish in relative solitude. The fly fishing friendly nature of that river. There is a significant number of us who have no interest in yanking our winter supply of fish out of the river standing shoulder to shoulder as is done within sight of the bridge. If this becomes the norm, many of us will stop coming to Cordova. We will long for the good old days of fishing in the wilds of Cordova. Several participants in Cordova economy will suffer along with us...

I have fished Ibeck as early as August 25th and as late as early October. Sometimes both. My observation is that there are plenty of spawning fish throughout the three miles of river above the bridge in any given year. Once a fish finds its spot in the river it begins to change color and for the most part if it is caught it will be released. Most of us prefer fresh fish with sea lice and here on Ibeck we can be that choosy. It has been my experience time and again that the fresh fish are more aggressive than the ones that have settled in. That helps. And let us not forget the fish that get past the 3 miles and spawn throughout the remaining several miles of habitat. I suspect that the ADFG data will support my contention that the fishery is not in danger.

What problem does this solve? I do not believe there is a shortage of fish. I am certain that we are not damaging the habitat. The trail after the first mile and on up to the 3 mile limit is less usable (more primitive) than it was 10 years ago. Mother nature is reclaiming the upper portions of the trail faster than our annual trampling. There are no camps on the 3 miles of river. No fires. No vehicle access. It's still a wild and beautiful place to fish. It aint broke. Please don't "fix" it.

Thank You for your time

Ron Samber. Anchorage resident 40+ years and 20+ years fishing in Cordova

Submitted By
Rory O'Hanrahan
Submitted On
11/15/2021 11:01:55 AM
Affiliation

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Anchorage , Alaska 99508

Please don't allow the harvest of rainbow trout in the Gulkana.



PC202
1 of 1

Submitted By
Ryan Checketts
Submitted On
11/7/2021 10:04:46 AM
Affiliation



PC203
1 of 1

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EIELSON AFB, Alaska 99702

Dipnetting salmon in the copper river has been an annual event for me, my wife, our eight kids, and our friends. I am so glad we have the ability to pay someone to take us out on the water. Fishing from the safety of the boats and having skilled captains who know how to navigate that crazy river removes a lot of stress from my shoulders. We allways get some fish, some years are better than others but we allways have fun. Please don't eliminate this oportunity for us.

Submitted By
SAE NA
Submitted On
11/15/2021 9:47:20 PM
Affiliation



PC204
1 of 1

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i love living alaska and one of the best part is having the ability to dip net on the copper river so I a, totally against prop 9. Thank you for reading my suggestion



SALMON HATCHERIES FOR ALASKA

November 15, 2021

Alaska Board of Fisheries
1255 W. 8th Street
P.O. Box 115526
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

As representatives of Alaska's hatchery program and the private nonprofit hatcheries, we submit our full support for Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA) and the critical programs these entities support for the entire Prince William Sound region and its user groups. We urge the Board of Fisheries to reject Proposals 49 - 55 due to the damage they would inflict on salmon fisheries across the southcentral region and the decreased hatchery production that would result if these proposals were implemented.

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 benefit 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 many more stakeholders who travel to the region for harvest opportunities. Any reduction in this 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 and introduce scientifically unsupportable directives into regulation governing hatchery programs. 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 points at issue in Proposals 54 and 55 were addressed by the Board of Fisheries when they took up an Emergency Petition and ACR's in 2018 which aimed 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 then and failed to substantiate claims of negative effects of hatchery salmon on natural stocks.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova. Please reach out to us if we can answer questions or provide any additional information whatsoever.

Respectfully,

Dean Day
Executive Director
Cook Inlet Aquaculture Association

Tina Fairbanks
Executive Director
Kodiak Regional Aquaculture Association

Mike H. Wells
Executive Director
Valdez Fisheries Development Association, Inc.

Geoff Clark
Interim General Manager
Prince William Sound Aquaculture Association



A handwritten signature in black ink that reads "Scott Wagner".

Scott Wagner
General Manager
Northern Southeast Regional Aquaculture Assoc.

A handwritten signature in black ink that reads "David Landis".

David Landis
General Manager
Southern Southeast Regional Aquaculture Assoc.



ECONOMIC IMPACT OF ALASKA'S SALMON HATCHERIES

OCTOBER 2018



PREPARED FOR

- Southern Southeast Regional Aquaculture Association
- Armstrong-Keta
- Douglas Island Pink and Chum, Inc.
- Northern Southeast Regional Aquaculture Association
- Prince William Sound Aquaculture Corporation
- Valdez Fisheries Development Association, Inc.
- Cook Inlet Aquaculture Association
- Kodiak Regional Aquaculture Association

PREPARED BY

McDowell
GROUP



Economic Impacts of Alaska's Salmon Hatcheries

Prepared for:

**Southern Southeast Regional Aquaculture Association
Armstrong-Keta
Douglas Island Pink and Chum, Inc.
Northern Southeast Regional Aquaculture Association
Prince William Sound Aquaculture Corporation
Valdez Fisheries Development Association, Inc.
Cook Inlet Aquaculture Association
Kodiak Regional Aquaculture Association**

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Prepared by:



October 2018



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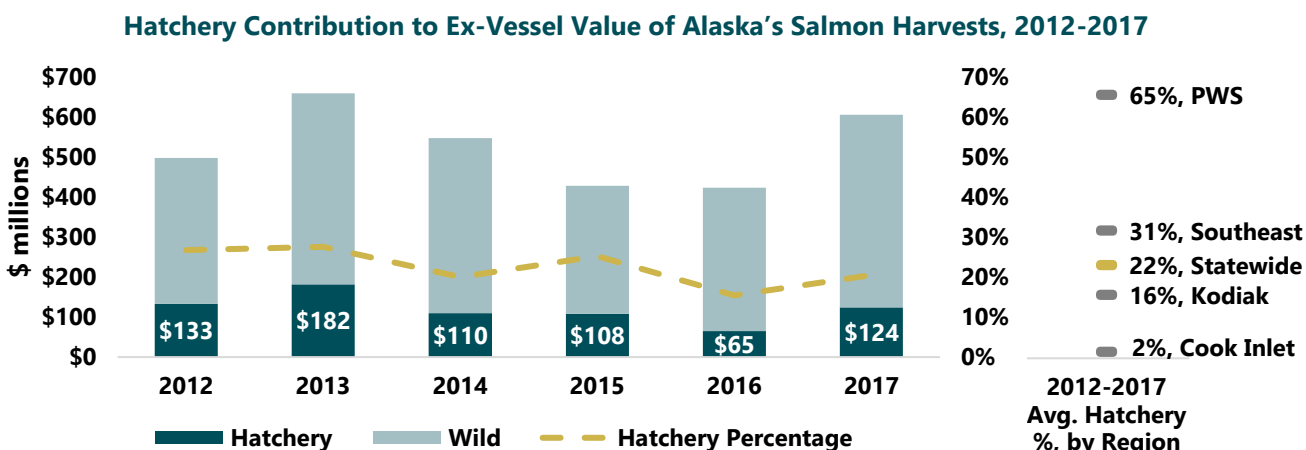
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Executive Summary

Alaska's salmon hatcheries contribute nearly a quarter of the value of our state's salmon harvests and generate \$600 million in economic output, with impacts throughout the economy. The scope of this report includes Alaska's eight private, nonprofit hatchery associations, including impacts resulting from hatchery-produced salmon as well as hatchery operations. Data sources include ADF&G, hatcheries, CFEC, DOLWD, and IMPLAN. Commercial harvest and processing data presented reflect annual averages across the six-year period 2012-2017. Sport harvest and related data reflect 2012-2016 averages due to a lag in ADF&G data availability.

Common Property Ex-Vessel Volume and Value

- Over the study period, commercial fishermen harvested an annual average of 222 million pounds of hatchery-produced salmon worth \$120 million in ex-vessel value.
- Chum and pink salmon are the most important species – responsible for 39 and 38 percent of ex-vessel value, respectively – followed by sockeye (16 percent), coho (4 percent), and Chinook (2 percent).
- More than half of hatchery salmon ex-vessel value went to seiners (57 percent). Gillnetters pulled in 38 percent, while trollers caught 5 percent of hatchery ex-vessel value over the study period.
- Regionally, Prince William Sound (PWS) harvests of hatchery salmon generated \$69 million in ex-vessel value annually. Southeast harvests earned fishermen \$44 million on average, followed by Kodiak (\$7 million) and Cook Inlet (\$0.5 million) harvests. It should be noted that Cook Inlet Aquaculture Association (CIAA) is currently building up their pink production and the full impact of these additional investments will not be seen for several more years. In addition, CIAA maintains several flow control structures and a fish ladder – efforts that lead to additional (though unquantifiable) salmon production.
- As a percentage of statewide harvest value, hatchery-derived salmon represents 22 percent of total salmon ex-vessel value over the study period. This percentage ranged from a high of 28 percent in 2013 to a low of 15 percent in 2016. Hatchery contribution was highest in PWS (65 percent) over the study period, followed by Southeast (31 percent), Kodiak (16 percent), and Cook Inlet (2 percent).

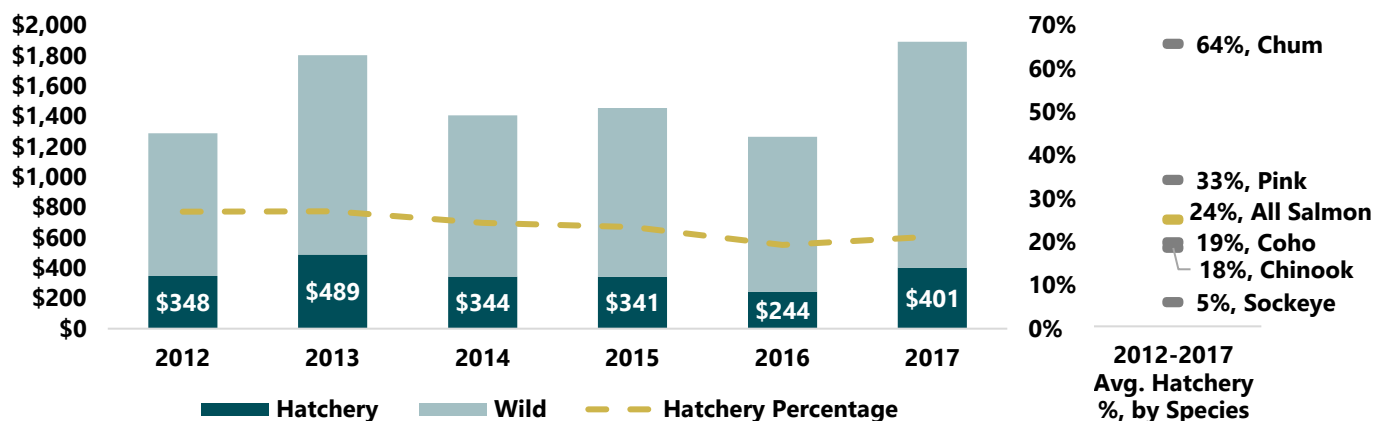


First Wholesale Value

- The first wholesale value – the value of raw fish plus the value added by the first processor – of hatchery-produced salmon averaged \$361 million annually across the study period.
- Nearly four-fifths (79 percent) of hatchery-produced first wholesale value is estimated to come from common property fisheries, with the remainder going to cost recovery harvests.
- Hatchery-derived first wholesale value represents 24 percent of total statewide salmon first wholesale value over the study period. By species, nearly two-thirds of chum, one-third of pink, and close to two-fifths of coho (19 percent) and Chinook (18 percent) wholesale production value was derived from hatchery salmon over the study period.

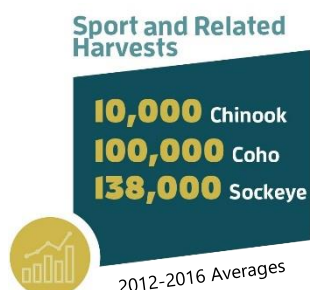


Hatchery Contribution to First Wholesale Value of Alaska Salmon Products, 2012-2017



Sport/Personal Use/Subsistence

- Coho, Chinook, and sockeye salmon are the most important hatchery-produced species for sport, personal use, and subsistence harvests. These species are produced in smaller numbers compared to pink and chum but are much more valuable on a per fish basis.
- On average, about 10,000 hatchery-origin Chinook, 5,000 chum, 100,000 coho, 19,000 pink, and 138,000 sockeye salmon were harvested annually in sport and related fisheries over the study period. These numbers are considered conservative due to limited sampling of sport and related harvests for origin (hatchery/non-hatchery), among other factors.

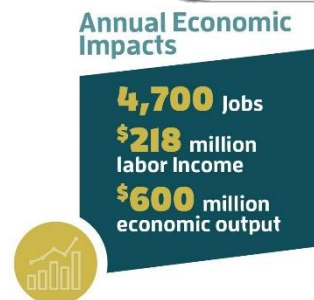


- Sport harvests accounted for over 99 percent of the sport/personal use/subsistence harvest of hatchery-produced coho and Chinook. By contrast, most non-commercial hatchery sockeye were harvested by personal use and subsistence fishermen (80 percent), with only 20 percent caught by sport fishermen.
- As a percentage of statewide sport-caught fish, hatchery-origin salmon accounted for 17 percent of sport coho harvests, 5 percent of sport sockeye harvests, and 8 percent of sport Chinook harvests.



Economic Impacts

- Alaska's salmon hatcheries account for the annual equivalent of 4,700 jobs and \$218 million in total labor income, including all direct, indirect, and induced economic impacts. A total of \$600 million in annual economic output is connected to Alaska salmon hatchery production.
- The employment impact of 4,700 jobs is an annualized estimate. The number of people who earn some income from the harvest of hatchery-produced salmon is several times the annual average. More than 16,000 fishermen, processing employees, and hatchery workers can attribute some portion of their income to Alaska's salmon hatchery production. Thousands of additional support sector workers earn wages connected to Alaska hatchery production.
- The economic footprint of Alaska's hatcheries includes \$95 million in labor income associated with commercial fishing, \$82 million in labor income associated with processing, and \$25 million connected to hatchery operations.
- Non-resident sport harvest of hatchery salmon accounts for \$16 million in annual labor income created directly or indirectly by Alaska's hatcheries. This number is limited to impacts resulting from non-resident sport harvest of hatchery salmon and should be considered conservative. Clearly, resident sport/personal use/subsistence harvests of hatchery salmon have additional economic impacts as well as very significant social and cultural impacts in Alaska.
- Southeast Alaska hatcheries account for 2,000 jobs (annualized), \$90 million in labor income, and \$237 million in total annual output, including all multiplier effects.
- Prince William Sound hatcheries account for 2,200 jobs, \$100 million in labor income, and \$315 million in total annual output, including all direct, indirect, and induced effects.



Total Annual Statewide Economic Impact of Alaska Salmon Hatcheries

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Commercial Fishing			
Employment	1,040	500	1,540
Labor Income	\$70.9 million	\$23.6 million	\$94.5 million
Seafood Processing			
Employment	1,360	820	2,180
Labor Income	\$52.2 million	\$29.6 million	\$81.8 million
Hatchery Operations			
Employment	345	270	615
Labor Income	\$15.5 million	\$9.4 million	\$24.9 million
Non-resident Sport Fishing			
Employment	285	90	375
Labor Income	\$10.5 million	\$5.7 million	\$16.2 million
Total Economic Impact			
Employment	3,030	1,680	4,710
Labor Income	\$149.1 million	\$68.3 million	\$217.5 million
Output	\$386.1 million	\$216.0 million	\$602.1 million



Introduction and Methodology

Hatchery-produced salmon are caught in commercial, sport, personal use, and subsistence fisheries throughout Southeast, Southcentral, and Kodiak – totaling more than 68 million fish annually in recent years. This study is the first comprehensive report detailing the economic impacts of these harvests and the hatchery activities that support them.

Alaska's salmon hatchery program was developed by the Alaska Department of Fish & Game (ADF&G) to enhance fisheries while protecting wild stocks. Since the 1970s, Alaska's salmon hatcheries have been increasingly operated by private non-profit (PNP) corporations that fund their operations through cost recovery harvests and other sources. ADF&G still operates two sport fish hatcheries (in Anchorage and Fairbanks) and remains involved in PNP hatchery operations in an oversight role to ensure that wild stocks are protected, among other goals.

Scope of Work

This study estimates and describes the economic impacts of Alaska's eight non-profit salmon hatchery associations (listed below along with the acronyms used in this report). Educational, research, ADF&G-run sport fish, and other small hatcheries fall outside the scope of this report.

- Southern Southeast Regional Aquaculture Association (SSRAA)
- Armstrong-Keta (AKI)
- Douglas Island Pink and Chum, Inc. (DIPAC)
- Northern Southeast Regional Aquaculture Association (NSRAA)
- Prince William Sound Aquaculture Corporation (PWSAC)
- Valdez Fisheries Development Association, Inc. (VFDA)
- Cook Inlet Aquaculture Association (CIAA)
- Kodiak Regional Aquaculture Association (KRAA)

This report concentrates on five primary subjects:

1. **Commercial Harvest** – The overall economic benefits of commercially caught, common property hatchery salmon are presented using ex-vessel value – the price paid to fishermen for their catch. The geographic distribution of these earnings is also reported.
2. **Seafood Processing** – The overall economic impact resulting from processing hatchery salmon in Alaska (including common property and cost recovery harvests) is estimated using first wholesale value data from ADF&G. First wholesale value represents the first sale of fish by a processor to a buyer outside their affiliate network.
3. **Sport/Personal Use/Subsistence Harvest** – Contributions of hatchery salmon to regional sport, personal use, and subsistence harvests are addressed, including impacts resulting from guided and unguided non-resident harvests.



4. **Economic Impacts** – This section summarizes the total economic impacts of hatch various sectors described above, along with the economic impacts resulting from the operations of Alaska’s eight hatchery associations.
5. **Tax Revenue** – Hatchery salmon support a variety of economic activities that are taxed, providing revenue to the State and local governments throughout Alaska.

Methodology

Hatchery contributions to Alaska’s salmon fisheries are tracked via ADF&G and hatchery-run sampling programs that collect salmon heads at seafood processors, on board fishing vessels, at docks and harbors frequented by sport fishermen, and at other locations. Otoliths and coded wire tags are collected and reviewed to determine the percentage of harvests attributable to hatchery production.¹ ADF&G uses this and other data to estimate the number of hatchery-produced salmon contributed by each hatchery association to various fisheries – data that form the basis of the annual enhancement reports produced by ADF&G.² For this report, hatchery associations were given the opportunity to update tables based on the enhancement report data described above. All data updates/edits provided by hatchery associations were minor in scale.

In general, data presented in this report are based on **six-year (2012 to 2017) averages** to avoid results influenced by particularly good or bad years for salmon survival. The exception is data related to sport/personal use/subsistence which is based on 2012 to 2016 averages due to a lag in data availability from ADF&G. Economic impact modeling is based on a combination of averages over the study period and 2017 financial data, as described in more detail below.

Ex-vessel and first wholesale value data are not adjusted for inflation in the report, due to the short time spans presented.

Ex-Vessel Volume and Value Calculations

Hatchery contribution data (numbers of fish) were combined with average weight per fish and price per pound data obtained from the Commercial Fisheries Entry Commission (CFEC) to calculate ex-vessel value, as follows:

$$\text{ex-vessel value} = \text{number of fish} * \text{average weight per fish} * \text{average price per pound}$$

Number of fish, average weight, and average price data were broken down by species, area of harvest (Southeast, Prince William Sound, Cook Inlet, and Kodiak), and gear type (seine, gillnet, and troll).

First Wholesale Value Calculations

Data available at the processing level – ADF&G Commercial Operator Annual Report or COAR data – is less detailed than data available at the ex-vessel level. Notably, it is not possible to specifically trace hatchery salmon through the processing stage. The simplifying assumption is made that, for each species in each region,

¹ Information contained in otoliths and coded wire tags indicate the species/variety, hatchery that produced the fish, and release year.

² Stopha, M. 2018. Alaska salmon fisheries enhancement annual report 2017. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 5J18-02.



hatchery salmon (including both common property and cost recovery harvests) are processed similarly as non-hatchery salmon.

Estimates of first wholesale value attributable to hatchery salmon are calculated by applying a price multiplier to hatchery ex-vessel volumes. The multipliers vary by region and species and are based on first wholesale value divided by ex-vessel volume calculated from ADF&G data. These multipliers introduce a potential source of noise because they combine different datasets created for different purposes. The degree of noise is judged to be minimal by the project team.

Sport/Personal Use/Subsistence

Data from ADF&G's annual enhancement reports provide estimates of the number of hatchery salmon, by species and hatchery association, caught by sport, personal use, and subsistence fishermen in Alaska. Harvest numbers reported in this section are considered conservative due to limited sampling of sport and related harvests for origin (hatchery/non-hatchery), among other factors.

Overall hatchery-produced sport harvest numbers presented in this report include hatchery salmon produced by ADF&G's sport fish hatchery in Anchorage, as these fish are caught alongside PNP hatchery salmon throughout Southcentral Alaska. However, all economic impact numbers consider only the contributions of Alaska's eight PNP hatchery associations.

Sport and related data presented in this report are generally based on 2012 to 2016 averages. Data from 2017 are not used due to a lag in reporting by ADF&G. This lag is due in part to anglers not returning personal use and subsistence harvest surveys in a timely fashion. In addition, the process to develop the state's estimates of sport harvests is complex – based on a statewide harvest survey. As of the writing of this report, 2017 sport harvest data is not available on ADF&G's website.

While not discussed in detail in this report, ADF&G charter logbook data (only available through 2014) was analyzed, along with various other sources of sport fish data, to inform the economic impact analysis.

Economic Impact Modeling

Employment and labor income are estimated for four aspects of Alaska's salmon hatchery program: commercial fishing, seafood processing, hatchery administration and operations, and sport fishing. Annual average (2012 to 2017) ex-vessel value forms the basis of the commercial fishing analysis. Models were developed for the seine, gillnet, and troll fisheries, where standard crewing and crew compensation practices were used to estimate labor participation, annualized employment, and total earnings (labor income). Assumptions about in-state spending on goods and services in support of fishing operations were made to estimate indirect effects. Analysis of induced effects (those stemming from fishermen spending their labor income in Alaska) includes adjustment for non-resident permit holder and crew participation in the various fisheries.

Employment and labor income related to processing of hatchery-produced salmon were based on the labor cost component of total first wholesale value (again measured for the period 2012 through 2017). Annual average employment was calculated by dividing total labor income by average annual wages in the seafood processing industry, as measured by the Alaska Department of Labor and published in the Quarterly Census of



Employment and Wages. With methods similar to those used in the commercial fishing analysis, participation in seafood processing was factored into the analysis of induced economic impacts.

Direct, indirect, and induced employment and labor income estimates associated with hatchery management and operations were based on financial statements and employee counts provided by each hatchery associations. The estimates are based on 2017 data alone.

Estimates of employment and labor income related to sport harvest of hatchery produced salmon are based on a variety of harvest data, non-resident visitor spending data, and previous McDowell Group research on the economic impacts of individual hatchery associations. Further discussion of sport fish methodology is provided in the body of this report.

Profile of Alaska's Salmon Hatcheries

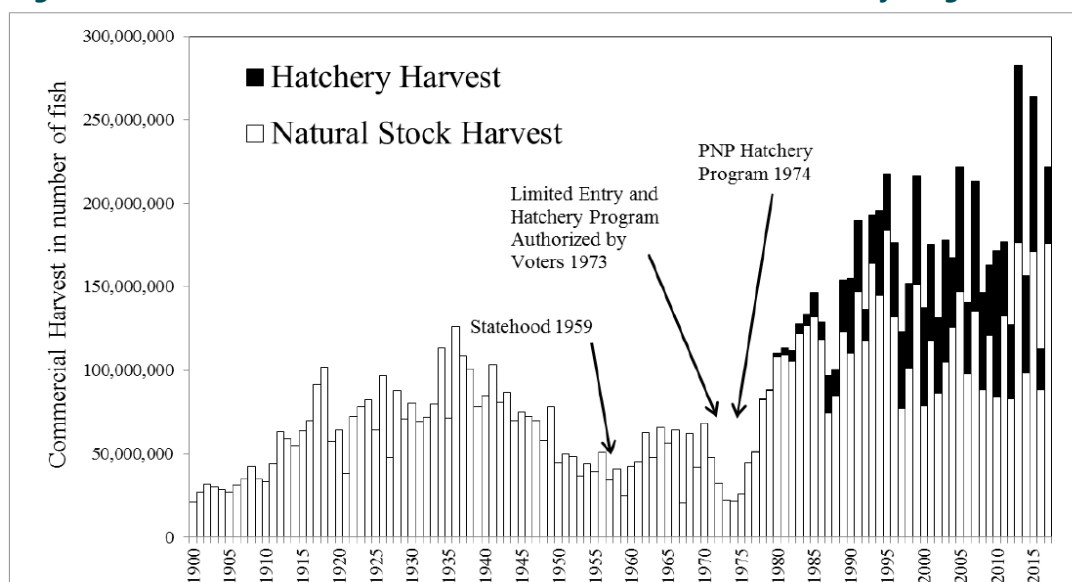
History

ADF&G's 2017 Alaska Salmon Fisheries Enhancement Annual Report describes the genesis and early history of our state's hatchery program:

Alaska's salmon hatcheries were developed in response to historically low salmon abundance in the early 1970s. In 1971, the Alaska Legislature established the Division of Fisheries Rehabilitation Enhancement and Development (FRED) within the Alaska Department of Fish and Game (ADF&G) for hatchery development. In 1972, Alaska voters approved an amendment to the state Constitution (Article 8, section 15), providing for an exemption to the "no exclusive right of fishery" clause, enabling limited entry to Alaska's state fisheries and allowing harvest of salmon for broodstock and cost recovery for hatcheries. In 1974, the Alaska Legislature expanded the hatchery program, authorizing private nonprofit (PNP) corporations to operate salmon hatcheries. Alaska's salmon hatchery program developed under this authority and was designed to supplement – not replace – sustainable natural production.

The ADF&G report also includes the following chart of wild and hatchery-origin commercial salmon harvests in Alaska, making the point that development of Alaska's hatchery program has coincided with the rebounding of Alaska's wild salmon populations and harvests to all-time highs.

Figure 1. Commercial Salmon Harvests in Alaska, Wild versus Hatchery-Origin, 1900-2017



Source: ADF&G 2017 Annual Enhancement Report.

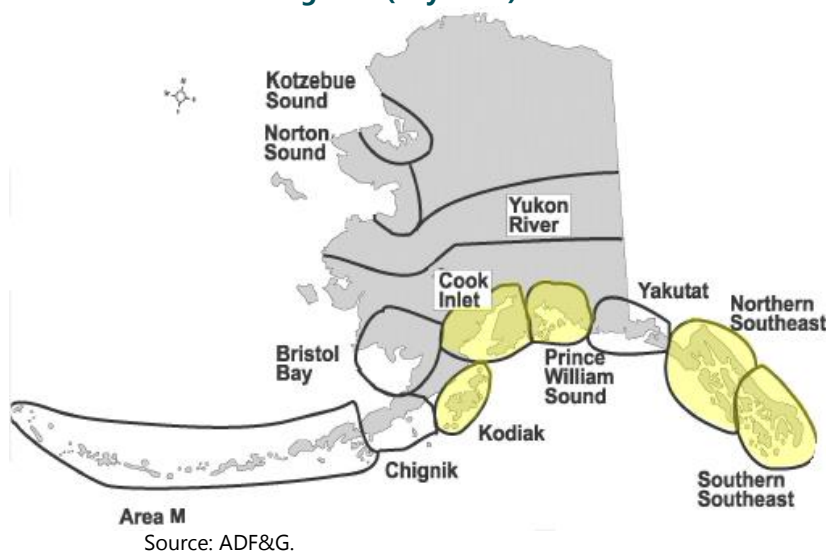
Controls

Alaska's salmon hatcheries are required to be located away from major natural salmon stocks, to use local sources of broodstock, and to mark their releases so that fishery managers can distinguish wild stocks and manage them conservatively. Alaska's genetic policy for hatcheries also forbids breeding of hatchery fish for size or other specific traits and requires the use of large numbers of broodstock to maintain genetic diversity in hatchery-produced salmon. These controls are a hallmark of Alaska's approach to salmon hatcheries and are an essential component of the overall program's success.

Current Hatchery Operations

Alaska's eight private nonprofit (PNP) hatchery associations operate a total of 25 hatcheries throughout Southeast Alaska, Southcentral Alaska, and Kodiak. As shown in Figure 2 below, hatcheries are active in five of Alaska's twelve major salmon regions. More detail on the production of these hatcheries is provided below, including key species and total releases. Hatchery associations also provide a variety of other benefits to their communities through educational, tourism, and restoration activities.

Figure 2. Regions of Alaska with Salmon Hatchery Programs (in yellow)



Production and Releases

Alaska's PNP hatchery associations operated a total of 25 hatcheries and 88 release sites in 2017. Each hatchery is typically associated with an adjacent release site, but smolts are also transported to remote release sites by boat, road, or plane.³

The map on the next page shows the location of hatchery release sites, color-coded by association. The size of the circles correspond to the number of smolts (all species) released at each site in 2017. A total of 1.7 billion salmon smolts were released in 2017 by Alaska's PNP hatchery associations.

Key Hatchery Terms

Hatchery: a facility in which salmon eggs are incubated and reared to early juvenile stage.

Release Site: location where smolt are released. Smolts are typically held for a short period of time in net pens to imprint to location, followed by release.

Raceway: salmon returning to hatcheries enter raceways – concrete swimming pools – for sorting and holding until needed for eggtake or other uses.

Broodstock: Salmon used to produce the next generation.

Eggtake: The process of collecting eggs from female salmon for incubation in the hatchery. Milt is also taken from male salmon.

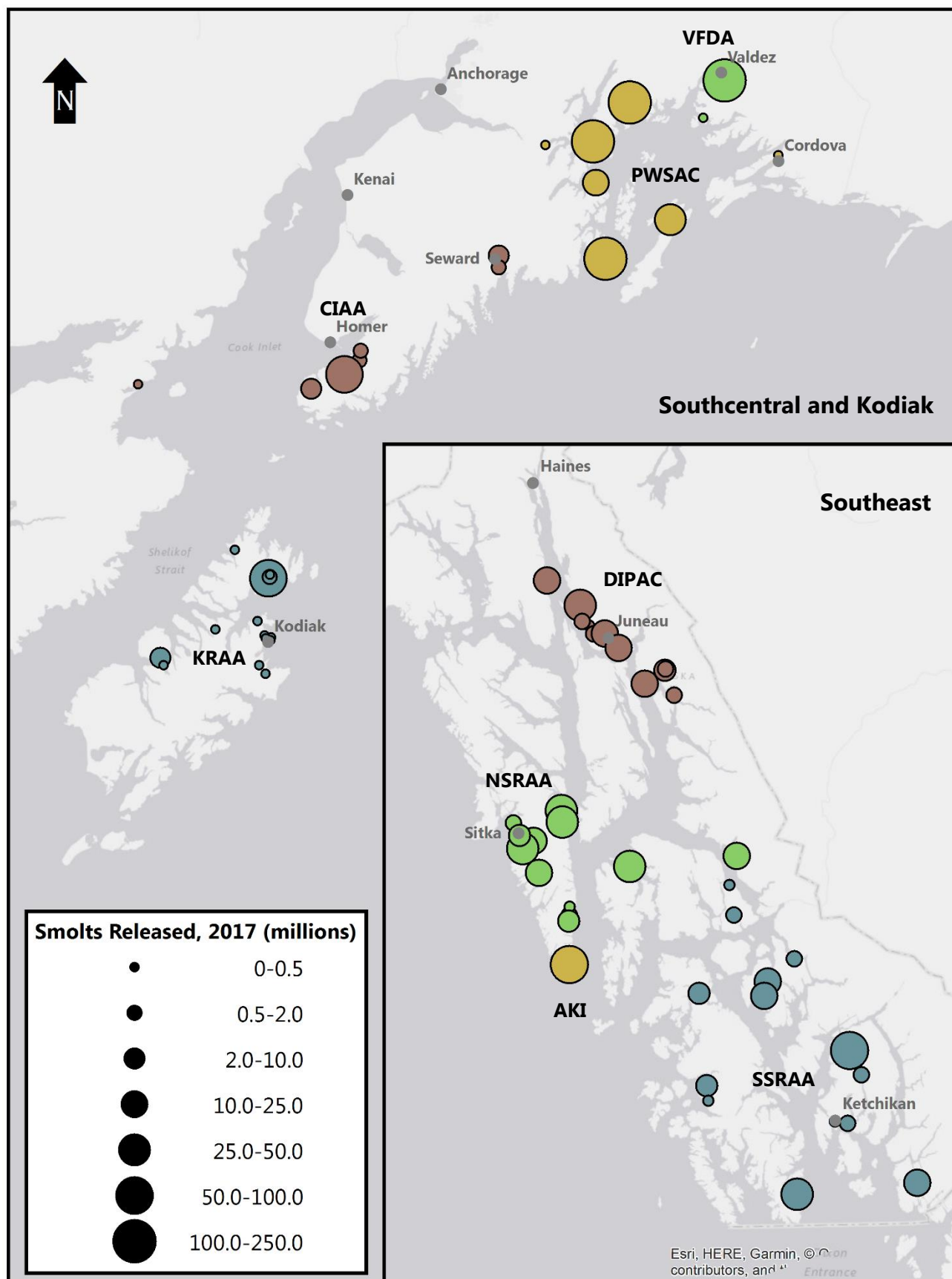
Smolt: early stage juvenile fish that are ready to enter the ocean.

Common Property: fish available to all permitted harvesters in a fishery.

Cost Recovery: Salmon harvested for the purposes of generating revenue to cover hatchery operations.

³ Transfers are tracked by ADF&G to ensure accountability to annual management plans developed for each hatchery.

Figure 3. Release Sites by Association (color) and Number of Smolt Released (size of circle)



Source: ADF&G and hatchery associations. Note: Some release sites combined if located in close proximity.



Species Produced

A total of 841 million **pink** smolts were released in 2017, representing more than half of Alaska hatchery releases in 2017 (53 percent). Pink salmon, with a short two-year life cycle, are the smallest of Alaska's salmon species. Odd and even-year populations are genetically distinct and survival rates and harvests are typically higher for odd-year populations. Over the study period, more than three-quarters (78 percent) of pink salmon releases occurred in PWS. Pink salmon are also produced in Kodiak, Cook Inlet, and Southeast Alaska. Cook Inlet pink production is expected to increase in the near future, as CIAA builds up their pink program. In Southeast Alaska, pink salmon are produced at just one hatchery (AKI's Port Armstrong hatchery).

Chum salmon accounted for 41 percent of hatchery releases in 2017, with more than three-quarters of those releases occurring in Southeast Alaska. Nearly 650 million chum smolts were released in 2017, including 503 million in Southeast Alaska, 131 million in PWS, and 14 million in Kodiak. Chum salmon return 2 to 4 years after release.

Sockeye, coho, and Chinook salmon made up just 3, 2, and 0.4 percent, respectively, of total hatchery releases in 2017. Whereas chum and pink salmon can be moved to release sites the spring following eggtake, sockeye, coho, and Chinook require another year of rearing to develop into smolts ready to be released into the wild. This adds greatly to the expense of raising these species, requiring subsidies from pink and chum production or other sources.

Sockeye are produced in all four of Alaska's hatchery regions, with a total of 50 million smolts released in 2017. Hatchery production in Cook Inlet is currently dominated by sockeye production, the only region where the species dominates. In addition to CIAA's Trail Lakes Hatchery, DIPAC's Snettisham Hatchery in Southeast Alaska, PWSAC's Main Bay and Gulkana hatcheries, and KRAA's Pillar Creek Hatchery are important producers of sockeye.

As shown in Table 1, Southeast Alaska dominates Chinook production, though this table does not include production at ADF&G's Anchorage sport fish hatchery, which produced and released 1.3 million Chinook in 2017. See additional discussion of Chinook and coho production in the sport/personal use/subsistence section of this report.

Table 1. Smolts Released in 2017, By Species and Region

	Chinook	Sockeye	Coho	Pink	Chum	All Species Combined
Number of Smolts Released (thousands), By Region						
Southeast	6,871	13,096	22,660	55,327	502,580	600,534
PWS	32	26,194	3,175	658,943	131,100	819,444
Cook Inlet	0	7,207	155	60,305	0	67,667
Kodiak	73	3,746	1,293	66,579	14,193	85,884
Statewide	6,976	50,243	27,283	841,154	647,873	1,573,529
Percent of Total	0.4%	3.2%	1.7%	53.5%	41.2%	100%

Note: Does not include releases of fish reared in ADF&G, research, and other hatcheries outside the scope of this report.
Source: ADF&G 2017 Annual Enhancement Report.

Funding Sources

Alaska private nonprofit hatcheries are financially self-sufficient, funding their operations largely through cost recovery activities and enhancement taxes paid by commercial fishermen. These two sources make up 79 percent and 11 percent, respectively, of the \$57 million in combined income collected in 2017, according to financial statements reviewed for this report. Other sources of funding include state and federal grants, tourism activities, and other miscellaneous sources.

Cost Recovery Operations

Alaska's hatchery program was designed to allow hatchery associations to allocate a certain amount of the salmon they produce to fund their operations. A variety of cost recovery approaches are employed to this end, most commonly competitive contracts with processors (under this model processors subcontract fishermen to harvest the fish and pay a royalty to hatchery associations). Other cost recovery models include direct sales of fish harvested by fishing vessels working for the hatchery association and direct sales of fish (including roe) that return to hatchery sites but are not required as broodstock.

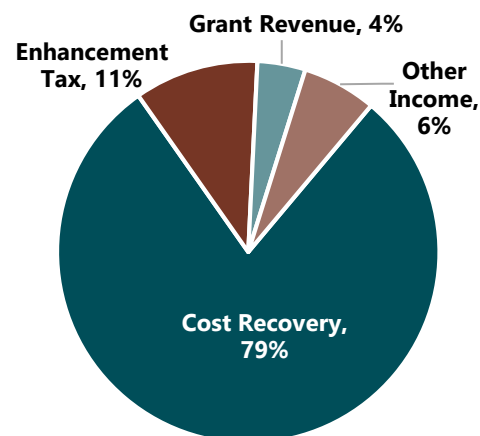
On average over the 2012 to 2017 period, 14 percent of the total hatchery-produced salmon returns were used for cost recovery activities. Most returns were used to supply common property commercial and sport fisheries (80 percent), with the rest used as broodstock (4 percent), and for other uses (1 percent).

Enhancement Taxes

In regions of the state where commercial fishermen have elected to tax themselves, a salmon enhancement tax of 1, 2, or 3 percent is collected on the ex-value of all salmon harvested by commercial fishermen in the region (except cost recovery harvests). Tax revenues are collected by the Alaska Department of Revenue and then dispersed by the legislature to qualified regional aquaculture associations.



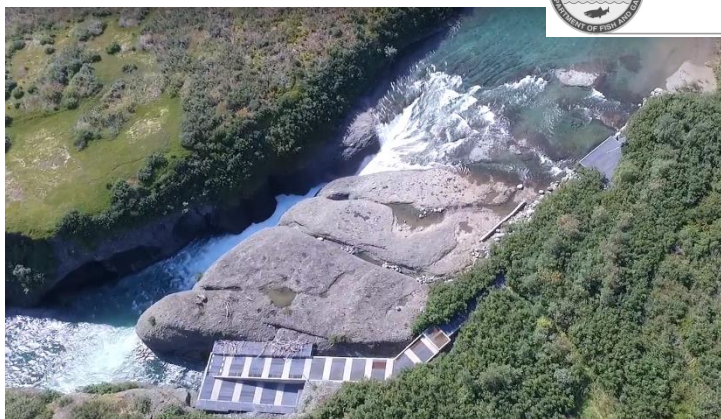
Figure 4. Alaska PNP Hatchery Association Funding Sources, 2017



Of Alaska's eight private nonprofit hatcheries, five are organized as regional aquaculture associations (SSRAA, NSRAA, PWSAC, CIAA, and KRAA) and receive enhancement tax revenue. Two additional associations operate in Alaska (in the Chignik and Yakutat areas) but currently do not operate hatcheries and use the funds for salmon research and other related purposes.

Grants

Alaska's PNP hatchery associations receive grants from local, state, federal, and other sources. State grant funds – primarily from the Legislature's capital budget – typically support improvements to state-owned hatchery facilities operated by PNP's, but state funds also support production of sport fish, and other miscellaneous projects.



Examples of other grant funds include federal disaster relief funds and funds from various sources supporting salmon habitat enhancement activities.

The Paint River fish ladder installed by CIAA with federal grants and association funds. The remote ladder (near Katmai National Park) has allowed pink, coho, and chum salmon to start colonizing Paint River. Photo credit: CIAA

Tourism Activities and Other Sources of Income

Nearly all hatcheries provide tours to locals and visitors interested in learning more about the salmon life cycle, hatcheries, and Alaska's marine and freshwater environments. Salmon returning to hatchery raceways and fish ladders provide up-close viewing opportunities and are timed well to match the peak of Alaska's visitor industry.

Hatcheries that have invested heavily in their ability to host visitors include DIPAC's Macaulay Salmon Hatchery in Juneau. In addition to salmon viewing opportunities (see photo below), the Ladd Makaulay Visitor Center offers guided tours of hatchery facilities and maintains a large aquarium, touch tanks, and a salmon-themed gift shop. Approximately 67,000 visitors paid to visit the Macaulay hatchery in 2017.

Hatcheries in remote locations receive fewer visitors but play an important role in providing unique tour opportunities for Alaska's visitor industry. Alaska's PNP hatchery associations regularly work with small cruise ship and other tour companies to meet visitor industry needs in locations with few other tour options.

Other sources of funds include investment income, rental income, and other miscellaneous sources.



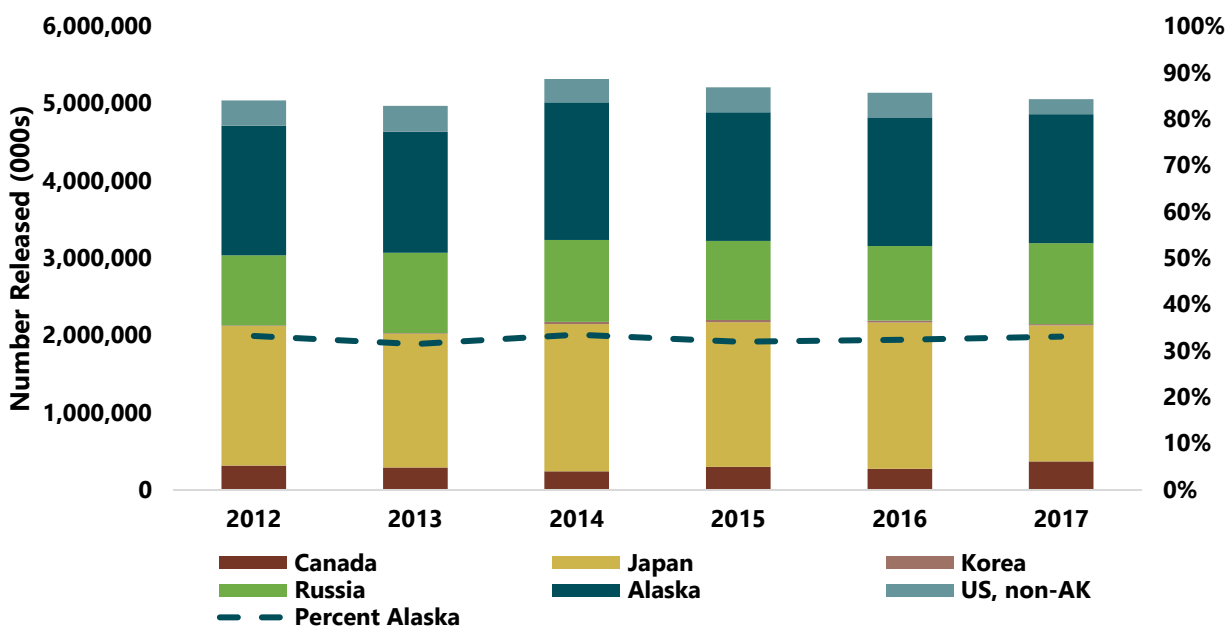
Photo credit: DIPAC

Other North Pacific Hatchery Releases

In addition to production in Alaska, major salmon hatchery programs operating in the North Pacific include those in other US states, Canada's British Columbia, Russia, South Korea, and Japan. As shown in the chart below – based on data from the North Pacific Anadromous Fish Commission and ADF&G – Alaska consistently produces one third of total North Pacific hatchery salmon releases.

By species, Alaska dominates pink salmon production (67 percent of North Pacific releases in 2017), but other regions/countries dominate production of all other species. In 2017, Japan and Russia were responsible for 50 and 23 percent of chum releases (Alaska produced 22 percent). Other US states dominate production of Chinook and coho. Canada had the largest production of sockeye with 72 percent of North Pacific releases of the species in 2017.

Figure 5. Hatchery Salmon Releases in the North Pacific, by Country, 2012-2017



Source: North Pacific Anadromous Fish Commission (country level releases) and ADF&G (Alaska releases).



Hatchery Contributions to Commercial Harvest

On average, 52 million hatchery-produced salmon are caught annually in **common property** commercial fisheries throughout Alaska. This section details the fishing fleets that catch these fish, the value of hatchery-produced salmon to these fishermen, and the percentage of overall harvests attributable to hatchery production. The data presented reflect annual averages over a six-year study period (2012 through 2017).

Hatchery-Impacted Commercial Salmon Fishing Fleets

Hatchery-produced salmon are caught by nearly all commercial salmon fishermen operating in Southeast Alaska, Prince William Sound, Kodiak, and Cook Inlet. Over the study period an annual average of 3,840 permit holders and an estimated 4,860 crew – for a combined 8,700 fishermen – benefited from hatchery production.⁴ These fishermen pulled in annual catches of more than 538 million pounds worth \$322.8 million, on average.

Some fishermen rely more on hatchery-produced salmon than others. For example, PWS seiners generally source most of their annual harvest from hatchery fish while Kodiak set gillnet fishermen have a much weaker direct connection to hatchery salmon.

Table 2. Hatchery-Impacted Salmon Fisheries in Alaska, 2012-2017 Average

	Permits Fished	Pounds Harvested (million lbs.)	Ex-Vessel Value (\$ millions)	Ex-Vessel Value per Active Permit
Southeast				
Drift Gillnet	432	37.8	\$28.2	\$65,000
Purse Seine	261	167.5	\$75.5	\$290,000
Power Troll	738	18.7	\$33.4	\$45,000
Hand Troll	317	0.9	\$1.9	\$6,000
Prince William Sound				
Drift Gillnet	519	35.0	\$46.5	\$90,000
Purse Seine	219	165.9	\$57.9	\$265,000
Set Gillnet	29	1.6	\$2.6	\$92,000
Cook Inlet				
Drift Gillnet	483	12.7	\$18.7	\$38,500
Purse Seine	17	5.9	\$2.3	\$133,500
Set Gillnet	506	6.6	\$10.8	\$21,500
Kodiak				
Purse Seine	170	76.1	\$37.3	\$218,000
Set Gillnet	149	9.5	\$7.7	\$51,000
Total	3,840	538.2	\$322.8	\$84,000

Source: CFEC.

⁴ Crew estimates based on the conservative assumption that drift gillnet, power troll, and set gillnet operations have one crew while seiners hire three crew members. No crew are assumed for hand troll operations.

Average earnings (from all salmon harvests) were highest in Prince William Sound, Southeast, and Kodiak – while earnings in Cook Inlet were considerably lower.

Overall, the average active salmon permit holder across these regions earned \$84,000 annually from harvest of wild and hatchery-produced salmon.

Seiners earned considerably more – averaging \$290,000 per boat in Southeast, \$265,000 in Prince William Sound, \$218,000 in Kodiak, and \$133,500 in Cook Inlet. In general, drift

gillnetters earned more than set gillnet and troll operations. Prince William Sound set gillnetters, though, earned an impressive \$92,000 annually – more than drift gillnetters in all other hatchery-influenced regions.

It should be noted that, due to data limitations, subsequent discussions of gear type will lump set and drift gillnetters into a gillnet category as well as power and hand trollers into a troll category.



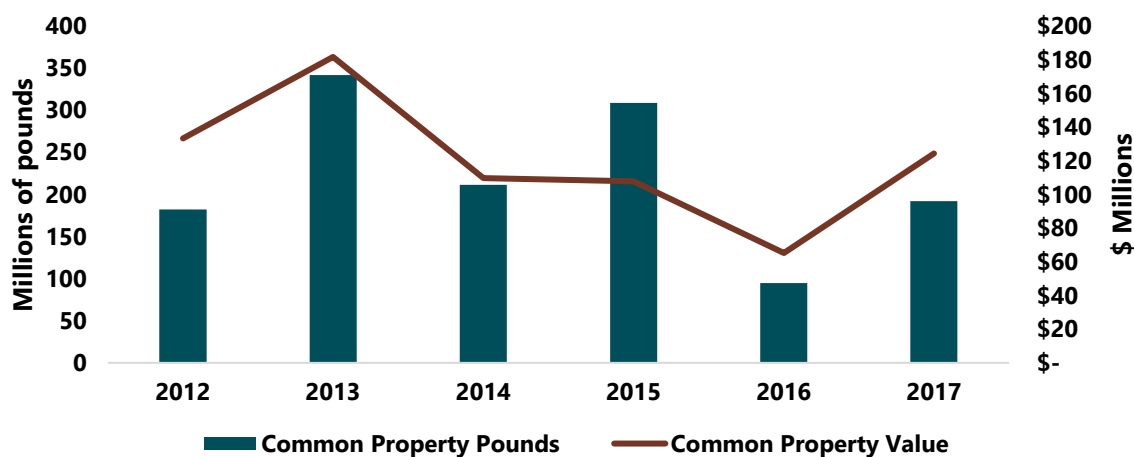
Seine opening near Juneau. Photo credit: DIPAC

Commercial Harvest of Hatchery-Produced Salmon

Hatchery production adds to the total salmon catch, as well as helps insulate fishermen and processors from dramatic swings in wild salmon production. From 2012 through 2017, hatcheries contributed a total of 1,332 million pounds worth an ex-vessel value of \$722 million to common property fisheries.

An average of 222 million pounds of hatchery salmon – worth \$120 million – were caught by common property commercial fishermen annually over the study period. The value of these harvests varied from \$65 million in 2016 to more than \$180 million in 2013. The even-year average was \$103 million, while odd-year harvests averaged \$138 million in value over the study period.

Figure 6. Hatchery-Produced Salmon Harvest Volume and Value, 2012-2017



Source: McDowell Group estimates based on data from ADF&G, CFEC, and hatchery associations.



Chum and pink salmon are the most important species – responsible for 39 and 38 percent of respectively – followed by sockeye (16 percent), coho (4 percent), and Chinook (2 percent). Especially large pink harvests in 2013 led to a peak of \$182 million in hatchery-produced ex-vessel value. That year, pinks made up over half (52 percent) of the value of hatchery harvests.

Pink salmon dominate hatchery production volumes – accounting for nearly two-thirds (62 percent) of ex-vessel volume – but are the least valuable per pound (\$0.34/pound on average across the study period). The most valuable hatchery-produced species are Chinook (\$3.56/pound), sockeye (\$2/pound), and coho (\$1.20/pound). As mentioned previously, these more valuable species are produced in lower numbers due to greatly increased costs of production. Chum value averaged \$0.67/pound from 2012 through 2017.

Table 3. Hatchery-Produced Harvest Volume and Value (millions), 2012-2017

	2012	2013	2014	2015	2016	2017	2012-2017 Average	2012-2017 Percent of Total
Ex-Vessel Volume (millions of pounds)								
Chinook	0.6	1.0	0.8	1.0	0.5	0.4	0.7	0.3%
Chum	76.5	89.4	47.0	67.0	56.6	86.3	70.5	32%
Coho	2.3	6.5	8.5	3.5	3.5	2.7	4.5	2%
Pink	89.6	235.6	143.9	227.2	27.3	96.3	136.6	62%
Sockeye	13.5	9.6	11.3	10.3	6.9	6.5	9.7	4%
Total	182.5	342.1	211.5	309.0	94.8	192.2	222.0	
Ex-Vessel Value (\$ millions)								
Chinook	\$2	\$3	\$3	\$3	\$2	\$2	\$2	2%
Chum	\$61	\$54	\$30	\$36	\$34	\$66	\$47	39%
Coho	\$3	\$9	\$10	\$3	\$5	\$4	\$5	4%
Pink	\$43	\$95	\$42	\$48	\$10	\$38	\$46	38%
Sockeye	\$23	\$21	\$25	\$18	\$14	\$14	\$19	16%
Total	\$133	\$182	\$110	\$108	\$65	\$124	\$120	

Note: Values have been rounded.

Source: McDowell Group estimates based on data from ADF&G, CFEC, and hatchery associations.

More than half of hatchery salmon ex-vessel value went to seiners (57 percent). Gillnetters pulled in 38 percent, while trollers caught 5 percent of hatchery ex-vessel value over the study period. Trollers are only active in Southeast Alaska; in that region, troll harvests accounted for 15 percent of hatchery-derived harvest value.

Nearly all hatchery pinks were caught by seiners. Gillnetters dominated the harvest of hatchery sockeye and caught the majority of hatchery chum. The troll fleet caught more hatchery Chinook and coho than other gear groups.

Table 4. Hatchery-Produced Harvest Value, by Gear Type and Species (000s), 2012-2017 Averages

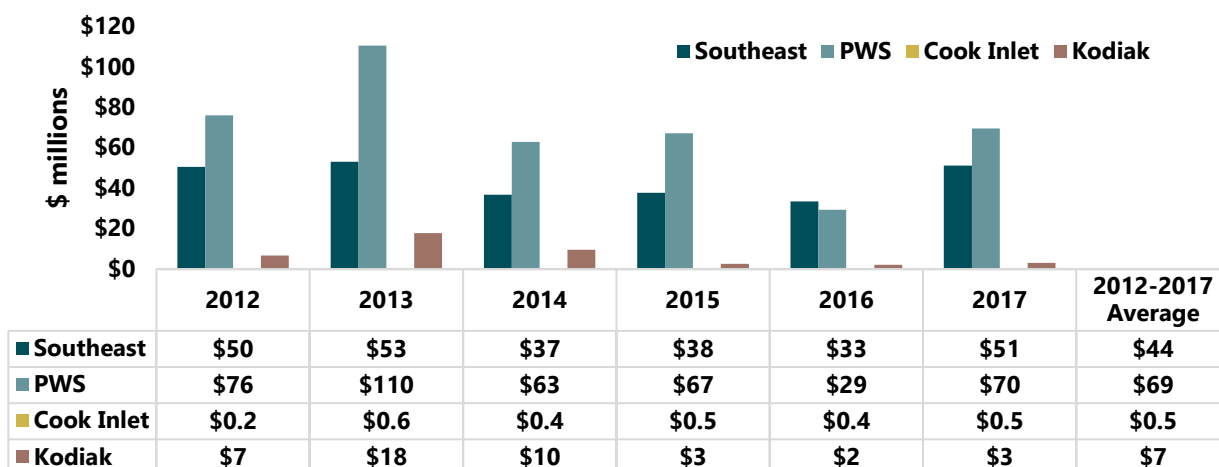
	Chinook	Chum	Coho	Pink	Sockeye	All Species Combined	% of Total
By Gear Type							
Gillnet	\$938	\$25,577	\$1,246	\$616	\$17,062	\$45,439	38%
Seine	\$466	\$19,529	\$843	\$45,360	\$2,280	\$68,478	57%
Troll	\$1,092	\$2,044	\$3,323	\$33	\$0	\$6,492	5%
Total	\$2,496	\$47,149	\$5,412	\$46,010	\$19,341	\$120,409	

Source: ADF&G, hatchery associations, CFEC. Note: Totals may not sum due to rounding.



Prince William Sound typically tops other regions in hatchery production and value. Over the study period, PWS hatchery harvests generated \$69 million in ex-vessel value annually. Southeast harvests earned fishermen \$44 million on average, followed by Kodiak harvests (\$7 million), and Cook Inlet harvests (\$0.5 million). In the particularly bad pink year of 2016, Southeast Alaska edged out PWS for highest hatchery ex-vessel value.

Figure 7. Hatchery-Produced Harvest Value, by Region, 2012-2017



PWS hatchery harvests vary substantially from year to year due to a focus on pink salmon, which made up an average of 60 percent of PWS hatchery-derived ex-vessel value over the study period, followed by sockeye (23 percent) and chum (17 percent). Kodiak hatchery harvest value is also dominated by pink salmon (57 percent over the study period), though sockeye is also important (33 percent).

Chum salmon is the main hatchery focus in Southeast Alaska, with 81 percent of hatchery ex-vessel value over the study period. As chum salmon survival does not generally vary wildly from year to year, Southeast Alaska hatchery production provides a significant stabilizing force for seafood processors and fishermen in the region.

Sockeye salmon is the main focus of hatchery operations in Cook Inlet, though CIAA is currently working to build up the association's pink salmon program.⁵ The full impact of these additional investments will not be seen for several more years. Currently, sockeye salmon make up 91 percent of the hatchery-produced ex-vessel value in Cook Inlet.

Table 5. Hatchery-Produced Harvest Value, by Species and Region (000s), 2012-2017 Averages

	Chinook	Chum	Coho	Pink	Sockeye	All Species Combined
Southeast	\$2,496	\$35,281	\$4,422	\$631	\$925	\$43,756
PWS	\$0	\$11,487	\$664	\$41,368	\$15,685	\$69,204
Cook Inlet	\$0	\$0	\$0	\$41	\$412	\$453
Kodiak	\$0	\$381	\$315	\$3,970	\$2,319	\$6,985

Source: ADF&G, hatchery associations, CFEC.

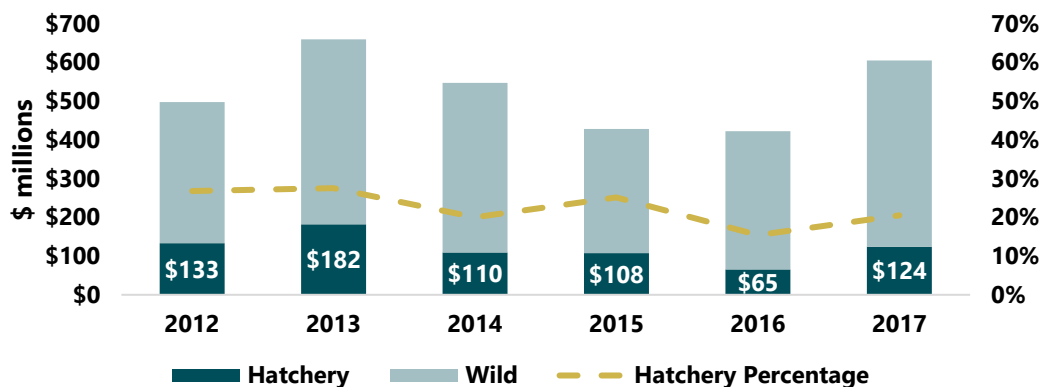
⁵ Although CIAA is permitted for an annual eggtake of 309 million, realized egg take has been much lower than the total. In 2017, the organization's eggtake was 173 million.



Hatchery Contributions as a Percentage of Overall Alaska Harvests

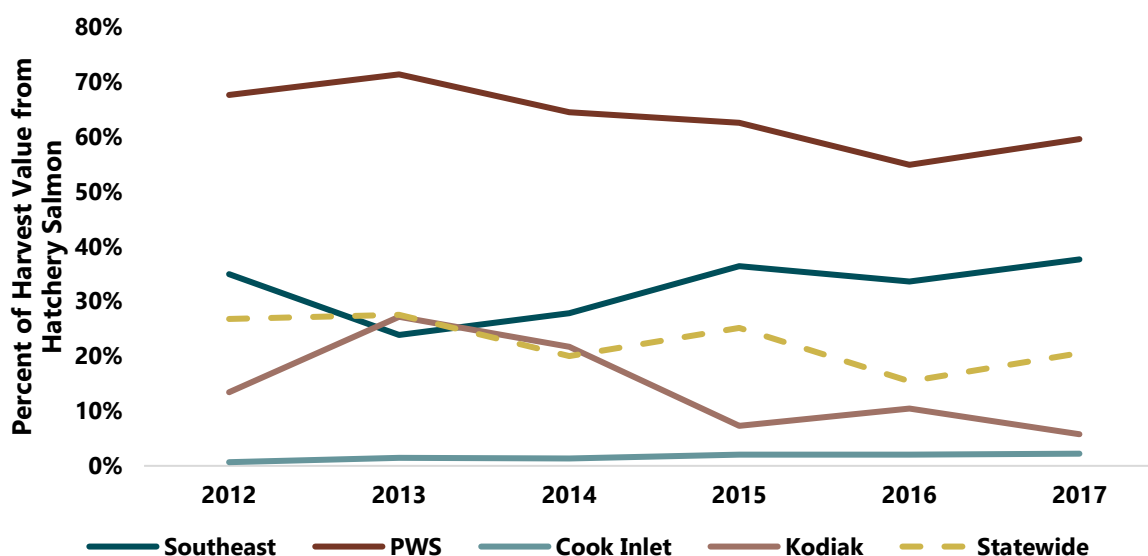
Hatchery-derived salmon represented 22 percent of Alaska's total common property salmon ex-vessel value over the study period. This percentage ranged from a high of 28 percent in 2013 to a low of 15 percent in 2016. Bristol Bay catches made up a third of this total salmon over the study period – more than any other region – due to several particularly strong years.

Figure 8. Hatchery Contribution to Ex-Vessel Value of Alaska's Salmon Harvests, 2012-2017



Hatchery contribution was highest in PWS (65 percent) over the study period, followed by Southeast (31 percent), Kodiak (16 percent), and Cook Inlet (2 percent). Over the study period, hatchery contribution percentages generally trended downward, though likely for different reasons depending on the region. Southeast was the exception, growing from 35 percent in 2012 to 38 percent in 2017. Key factors influencing regional hatchery contribution percentage include the relative strength of salmon runs and hatchery production levels for each salmon species, especially pink versus chum.

Figure 9. Hatchery Contribution to Total Salmon Ex-Vessel Value, by Region, 2012-2017



Source: McDowell Group estimates based on data from ADF&G, hatchery associations, and CFEC.



Hatchery Contributions to the Seafood Processing Sector

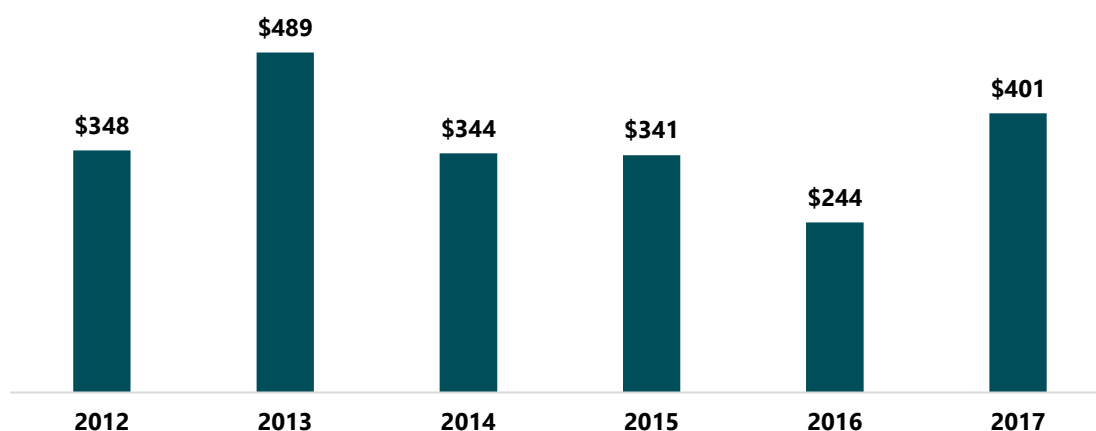
Salmon produced by Alaska's hatcheries and caught commercially are processed into a variety of products, generating significant benefits for Alaska's seafood processing industry. Over the study period, the first wholesale value of products produced with hatchery-produced salmon is estimated to average \$361 million annually. First wholesale value (FWV) is defined as the price received at sale of product by a processor to a buyer outside their affiliate network.

First wholesale value includes payments to commercial fishermen (ex-vessel value) as well as the value-added by processors as they convert raw fish into various seafood products. The value added by processors supports the full spectrum of processor expenditures – including labor, local utilities, packaging and warehousing, tender vessel operations, expediting, and maintenance and mechanical services, among others – as well as processor profits.

Total First Wholesale Value

Over the 2012-2017 period, the first wholesale value of hatchery-produced salmon — including both common property and cost recovery fish — averaged \$361 million annually. In the peak year of 2013, hatchery-derived FWV reached close to half a billion dollars (\$489 million). Nearly four-fifths (79 percent) of hatchery-produced first wholesale value is estimated to come from common property fisheries, with the remainder deriving from cost recovery harvests.

Figure 10. First Wholesale Value of Alaska Hatchery Salmon Products (\$ millions), 2012-2017



Similar to the relative contribution of each species to hatchery ex-vessel value, hatchery FWV is dominated by pink and chum salmon products (44 and 39 percent, respectively). Sockeye is responsible for 10 percent of hatchery-derived FWV, while coho (5 percent) and Chinook (2 percent) play smaller roles.

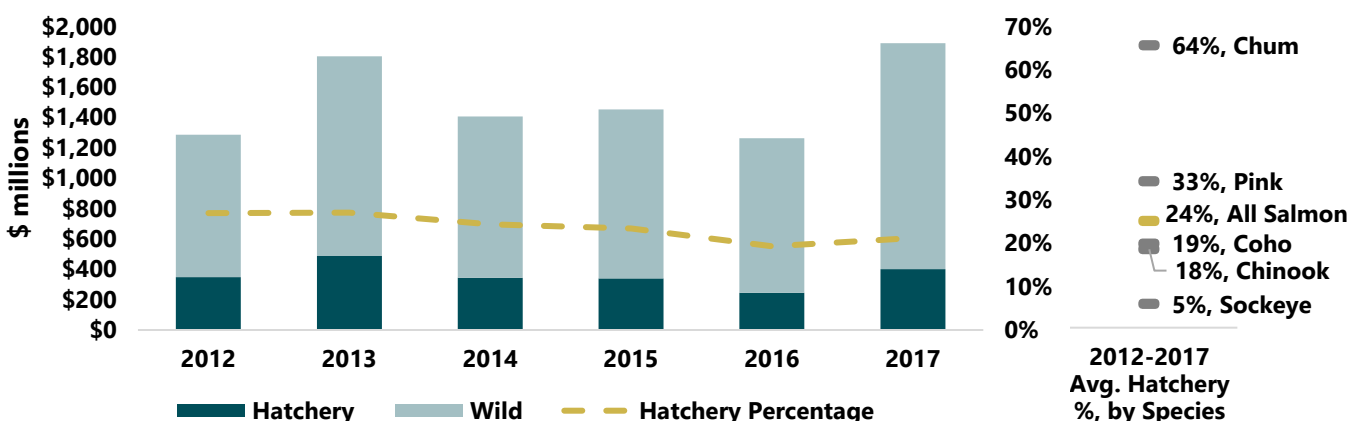
Another way to consider hatchery contributions to Alaska's processing sector is to examine the value remaining after payments to fishermen. After paying harvesters an estimated \$146 million for raw fish, Alaska's salmon processors earned an estimated gross margin of \$216 million from hatchery-derived salmon products. This figure is not to be confused with profit margin as processors incur significant costs handling and producing salmon products.

Hatchery Contributions as a Percentage of Overall First Wholesale Value

Hatchery production is responsible for an estimated 24 percent of total statewide salmon first wholesale value over the study period. This percentage ranged from 19 to 27 percent over the study period. Massive salmon harvests in Bristol Bay – combined with relatively weak pink runs – in recent years drive lower hatchery contribution percentages in the latter half of the study period.

By species, nearly two-thirds of chum wholesale value, one-third of pink wholesale value, and close to two-fifths of coho (19 percent) and Chinook (18 percent) wholesale value was derived from hatchery salmon over the study period. Due to the dominance of Bristol Bay fish, hatchery-derived sockeye products – despite being the third most valuable hatchery species – only make up 5 percent of sockeye FWV statewide.

Figure 11. Hatchery Contribution to First Wholesale Value of Alaska Salmon Products, 2012-2017



Considering only the regions of the state with hatchery production (Southeast, PWS, Kodiak, and Cook Inlet), hatchery salmon are responsible for 40 percent of ex-vessel value and 37 percent of first wholesale value. By species, hatchery-derived wholesale value made up 73 percent of chum value, 35 percent of pink value, 21 percent of coho value, 19 percent of Chinook value, and 17 percent of sockeye value.

Hatchery Contributions to Sport Fishing, Personal Use, and Subsistence in Alaska

Hatchery production contributes substantially to the availability of salmon for resident and non-resident sport fishing, as well as personal use and subsistence harvest by Alaskans. Over the 2012 – 2016 period, an estimated 10,000 hatchery-reared Chinook, 5,000 chum, 100,000 coho, 19,000 pink, and 138,000 sockeye were caught annually in sport/personal use/subsistence fisheries in Alaska.

Harvest numbers reported in this section are considered conservative due to limited sampling of sport and related harvests for origin (hatchery/non-hatchery), among other factors. Harvest numbers include hatchery salmon produced by ADF&G's sport fish hatchery in Anchorage, as these fish are caught alongside PNP hatchery salmon throughout Southcentral Alaska. Production at Alaska's eight PNP hatcheries account for 94 percent of all hatchery-origin sport salmon harvests over the study period.

Table 6. Sport and Related Harvest of Hatchery Salmon, by Species, 2012-2016 Annual Average

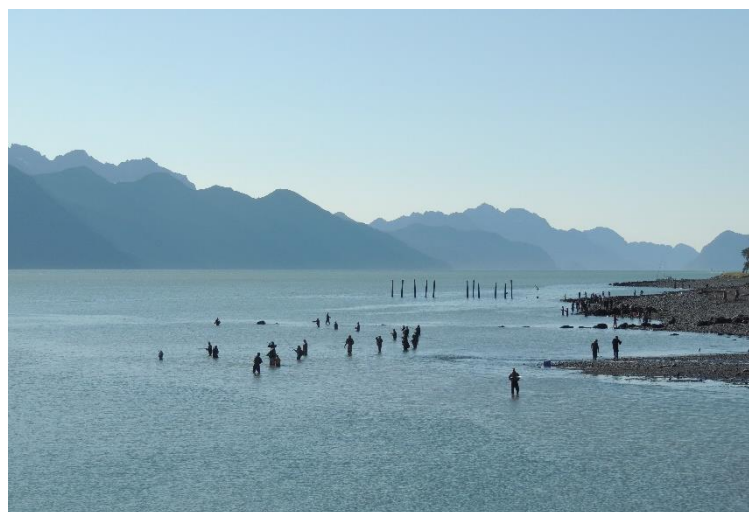
	2012-2016 Average (Number of Fish)
Chinook	10,000
Chum	5,000
Coho	100,000
Pink	19,000
Sockeye	138,000

Source: ADF&G. Note: Numbers have been rounded to reflect the imprecise nature of these estimates.

Sport harvests accounted for nearly all the sport/personal use/subsistence harvest of hatchery-produced coho and Chinook over the study period. By contrast, most non-commercial hatchery sockeye were harvested by personal use and subsistence fishermen (80 percent), with only 20 percent caught by sport fishermen.

Sport Fishing

Hatchery releases – primarily in Valdez, Seward, Juneau, Ketchikan, Wrangell, lower Kenai Peninsula, and Kodiak – support extensive shore-based and saltwater fishing opportunities. The top fifteen hatchery sport harvests, by species and hatchery association, are listed below, along with the communities or regions in which most of each harvest occurs.



Silver fishing near Seward. Photo credit: CIAA

Table 7. Top Hatchery Sport Harvests, by Hatchery Association and Species, 2012-2016 A

Hatchery Association	Species	2012-2016 Avg. Annual Harvest	Primary Harvest Regions/Communities
SSRAA	Coho	30,825	Ketchikan, Wrangell
CIAA	Sockeye	25,683	Kenai Peninsula, Lower Cook Inlet
VFDA	Coho	24,893	Valdez
VFDA	Pink	16,678	Valdez
PWSAC	Coho	7,385	Whittier
NSRAA	Coho	7,080	Sitka, Angoon
DIPAC	Coho	6,830	Juneau
KRAA	Coho	4,218	Kodiak
CIAA	Coho	3,584	Seward
SSRAA	Chinook	2,641	Ketchikan
DIPAC	Chum	2,622	Juneau
CIAA	Pink	2,400	Homer, Seldovia, Nanwalek, Port Graham
KRAA	Chinook	2,017	Kodiak
DIPAC	Chinook	1,954	Juneau
NSRAA	Chinook	1,585	Sitka

The harvest numbers presented above are annual average harvests over the study period. Actual hatchery-origin harvests vary year to year depending on hatchery release numbers, local sport bag limits, fishing effort, and other factors. For instance, DIPAC's revitalized coho program has created significant fishing opportunities in the Juneau area in recent years; in 2018, ADF&G managers doubled the sport bag limit for coho in Juneau area waters as a result of exceptionally strong returns.

Coho and pink returns to the Valdez area – which can be caught from the shore as well as by boat – have long supported a series of annual salmon derbies as well as significant charter fishing activity and both resident and non-resident visitation to the community. (See photo at right.)

In addition to adding to overall harvests, hatchery fish can provide crucial fishing opportunities in certain times of year or weather conditions – an especially important factor for charter fishing businesses. In May and June in the Ketchikan area, for instance, the local charter fleet (primarily serving cruise visitors) is largely dependent on SSRAA Chinook returning to nearby release sites. This was especially true in 2018 due to low wild Chinook runs. SSRAA coho are also crucial during the late coho run (late August through September) for certain charter operators in the region.


Silver fishing in Valdez. Photo: Garrett Evridge



Based on data from annual ADF&G harvest surveys, anglers in Alaska spent about 2.1 million ar fishing for all types of species annually (2012-2016 average). These anglers caught about 120,000 Chinook, 22,000 chum, 583,000 coho, 135,000 pink, and 556,000 sockeye annually over the period.

Harvests in Southeast and Southcentral combined accounted for between 90 and 99 percent of the total statewide sport harvest, depending on the species of salmon. The relative importance of saltwater and freshwater sport salmon fishing varies considerably between the two regions, with most Southeast sport harvests occurring in saltwater but roughly equal harvests in saltwater and freshwater in Southcentral. In both regions, most sockeye harvests are in freshwater. An impressive 94 percent of statewide sport sockeye harvests occurred in Southcentral, with nearly all of that harvest occurring in freshwater.

Table 8. Sport Salmon Harvests, by Region and Saltwater/Freshwater, 2012-2016 Annual Averages

	Sport Harvest	% Saltwater	Hatchery Harvest	% Hatchery
Southeast				
Chinook	67,587	98%	6,227	9%
Chum	12,254	95%	3,425	28%
Coho	274,979	89%	45,772	17%
Pink	73,940	90%	45	0%
Sockeye	18,230	40%	0	0%
Southcentral				
Chinook	50,039	54%	3,700	7%
Chum	8,059	31%	1,263	16%
Coho	297,344	45%	54,592	18%
Pink	57,552	49%	17,880	31%
Sockeye	519,765	5%	27,593	5%
Statewide				
Chinook	118,612	79%	9,936	8%
Chum	22,517	63%	4,687	21%
Coho	583,303	65%	100,364	17%
Pink	135,643	70%	17,925	13%
Sockeye	555,762	6%	27,593	5%

Source: ADF&G.

As a percentage of statewide sport-caught fish, hatchery-origin salmon accounted for 17 percent of sport coho harvests, 5 percent of sport sockeye harvests, and 8 percent of sport Chinook harvests. Unknown, but likely similar, percentages of Alaska's guided charter harvests are of hatchery origin.

Hatchery contributions by region were similar to the statewide percentages for Chinook and coho. Compared to Southeast, hatchery salmon made up higher percentages of Southcentral sockeye (5 percent) and pink (31 percent) sport harvests. In Southeast Alaska, hatchery salmon were especially important to sport chum harvests (28 percent) – perhaps due in part to a charter fishing operation in Juneau specializing in family friendly chum salmon fishing opportunities from a dock adjacent to DIPAC's Juneau hatchery (Chum Fun Charters).

Personal Use and Subsistence

Personal use and subsistence salmon fishing in Alaska is largely focused on sockeye salmon; a variety of gear are used including dip nets, cast nets, gillnets, and other gear types. Major hatchery-supported personal use/subsistence fisheries include three Copper River fisheries near Chitina, the Sweetheart Creek fishery near Juneau, various sockeye fisheries on Kodiak Island, and the China Poot fishery across Kachemak Bay from Homer.

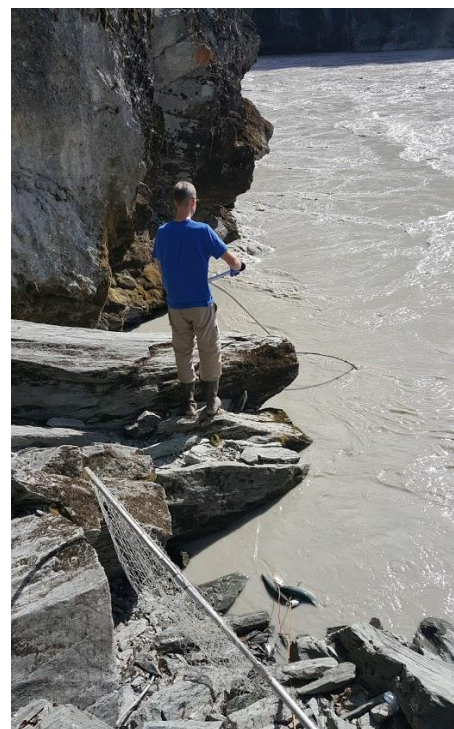
Table 9. Top Hatchery Personal Use and Subsistence Harvests, by Hatchery Association and Species, 2012-2016 Annual Averages

Hatchery Association	Species	2012-2016 Avg. Annual Harvest	Primary Affected Communities
PWSAC	Sockeye	102,500	Fairbanks, Anchorage, Mat-Su, Copper River Valley
DIPAC	Sockeye	3,725	Juneau
KRAA	Sockeye	2,900	Kodiak, Ouzinkie
CIAA	Sockeye	1,355	Homer, Seldovia

The relative importance of hatchery fish to each of the fisheries listed above varies. Roughly 20 percent of Copper River subsistence/personal use sockeye harvests are produced by PWSAC's Gulkana hatchery. By contrast, the Sweetheart Creek personal use fishery near Juneau – which supports 220 households annually – is exclusively based on hatchery fish. Roughly a third of Copper River harvests are caught by households in Fairbanks, a quarter by Anchorage households, 18 percent by Mat-Su households, and 16 percent by Copper Valley area residents. Hatchery-supported subsistence fisheries on Kodiak Island include Telrod Creek and Ouzinkie fisheries.



China Poot dipnet fishing. Photo credit: CIAA



Copper River dipnet fishing



Economic Impacts of Hatchery Produced Salmon in Alaska

This analysis considers the full spectrum of economic impacts associated with salmon production at Alaska's eight private nonprofit hatchery associations. It includes analysis of direct, indirect, and induced economic impacts associated with:

- Commercial harvest of common property hatchery-produced salmon
- Processing of common property and cost-recovery hatchery salmon
- Hatchery operations and management
- Sport harvest of hatchery-produced salmon.

The economic impact model used for this analysis is based on the ex-vessel and first wholesale values described elsewhere in this report. The model incorporates industry characteristics that affect the magnitude of multiplier effects, including:

- The residency of permit holders and crew who harvest hatchery-produced salmon. Alaska resident fishermen are likely to spend a greater share of their earnings in Alaska — with greater multiplier effect — than non-Alaskans
- The residency of workers who process hatchery-produced salmon. Alaska's seafood processing sector has high non-resident labor participation. Non-resident workers spend less of their wages in Alaska than resident workers.
- In-state versus out-of-state purchases in support of fishing, processing, and hatchery operations. A significant portion of purchases made in support of seafood industry activity occur out of state (mainly Puget Sound).

Regional and statewide economic impacts associated with Alaska's salmon hatchery production are described in more detail below.

A Note on Annualized versus Total Job Estimates

Describing the economic impact of Alaska's salmon hatcheries in terms of employment is complicated by the highly seasonal nature of Alaska's salmon fishing and seafood processing industries. This study focuses on annualized employment. While understating the number of people that earn some income due to hatchery production, annualized employment numbers allow for comparisons to other sectors of the economy.

As an example, three crewmen (peak employment) each working a four-month season would be the equivalent one annualized (12 month) job. Where possible, annualized job estimates are supplemented with data that better illustrates the total number of people earning some income resulting from hatchery production and operations.



Commercial Fishing Impacts

The direct impact of hatcheries on commercial fishing includes income fishermen earn from the harvest of hatchery-produced salmon. Indirect and induced (multiplier) impacts occur when these fishermen spend hatchery salmon-related income in Alaska in support of their fishing operations and in support of their own households.

Alaska commercial fishermen harvested an annual average of \$120 million (ex-vessel) worth of hatchery-produced salmon over the 2012-2017 period. Nearly 60 percent of this total (\$71 million) went to permit holders and crew in the form of labor income. Additional labor income was generated indirectly when fishermen purchased supplies, gear, equipment, and services locally in support of their fishing operations. Induced labor income was created when permit holders and crew spend their income in Alaska. Including these indirect and induced effects, total commercial fishing-related labor income associated with harvest of hatchery-produced salmon is estimated at an annual average of \$94.5 million.

Statewide, employment directly associated with commercial harvest of hatchery-produced salmon is measured at 1,040 jobs annually over the study period. Including direct, indirect, and induced employment, commercial harvest of hatchery-produced salmon accounted for an annual average of 1,540 jobs.

Table 10. Total Employment and Labor Income Associated with Commercial Harvest of Hatchery-Produced Salmon, 2012-2017 Averages

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Commercial Fishing			
Annualized Employment	1,040	500	1,540
Total Annual Labor Income	\$70.9 million	\$23.6 million	\$94.5 million

Though not possible to quantify precisely, the number of people earning some income from commercial harvest of hatchery-produced salmon is several times larger than the annualized average. For example, virtually all seine and gillnet permit holders in Prince William Sound harvest some amount of hatchery produced fish. In 2017 there were 763 seine, drift net and set net permits fished in Prince William Sound. Based on standard crew sizes in these fisheries, it is evident that approximately 2,000 permit holders and crew can attribute some portion of their income to harvest of hatchery produced salmon. Similarly, in Southeast Alaska, a total of 1,657 troll, gillnet and seine permits were fished in 2017, with total participation estimated at approximately 3,500 permit holders and crew. Statewide, it is estimated that approximately 8,000 fishermen (permit holders and crew) earned some measure of income from harvest of hatchery-produced salmon.

Seafood Processing Impacts

The economic impact of salmon hatcheries on the seafood processing sector in Alaska includes jobs and wages for workers who handle and add value to hatchery-produced salmon. Multiplier effects result from in-state spending in support of plant operations (utilities, supplies, taxes, transportations services, etc.) and from in-state spending of processing workers' wages (consumer goods, groceries, entertainment, etc.).



Estimates of processing-related employment and wages connected to hatchery-produced salmon, the total first wholesale value of those salmon. First wholesale value includes the amount processors paid to fishermen for their catch (the ex-vessel value of the fish), the amount spent on wages for processing plant employees, purchases of the goods and services required to process the fish, taxes, and other costs of doing business.

Based on McDowell Group estimates, hatchery-produced salmon were processed into products worth an annual average of \$362 million over the study period. Of this total, approximately \$52 million per year went to processing workers in the form of labor income. With monthly wages of about \$3,200 in sectors of the seafood processing industry most closely connected to hatchery salmon, direct employment can be estimated at about 1,360 jobs, on an annualized basis, over the 2012-2017 period.

Including multiplier effects, total statewide employment associated with processing of hatchery-produced salmon is estimated at 2,180 jobs and \$82 million in total annual labor income.

**Table 11. Total Employment and Labor Income
Associated with Processing Hatchery-Produced Salmon, 2012-2017 Averages**

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Seafood Processing			
Annualized Employment	1,360	820	2,180
Total Annual Labor Income	\$52.2 million	\$29.6 million	\$81.8 million

Similar to the distribution of commercial fishing income associated with harvest of hatchery-produced salmon, the total number of processing workers who can attribute some portion of their wages to processing of these salmon is much larger than the annual average. For example, in 2017, an annual average 526 workers were employed in Prince William Sound's seafood processing sector. Peak employment totaled 1,906. All of these workers owe some portion of their wages to processing of hatchery salmon, which account for about 65 percent of the total salmon harvest in the region. In Southeast, seafood processing accounts for an average of 1,350 jobs, with peak season employment at approximately 3,400. Most of these workers are handling hatchery salmon at some point in the season. In the Southeast, Prince William Sound, Cook Inlet, and Kodiak regions, employment in seafood processing peaked at approximately 8,400 jobs in 2017. The large volumes of hatchery-produced salmon harvested during the summer played an important role in supporting this employment and the \$154 million in total annual wages associated with those jobs.

Hatchery Management and Operations

The economic impact of hatcheries includes their own employment, wages, and spending with Alaska businesses. Hatcheries maintain a core group of year-round employees, supplemented by seasonal workers as necessary.

Vendor spending information provided by hatchery associations indicates that approximately \$22 million is spent in-state annually on a range of goods and services. This spending supports additional jobs and income in the Alaska economy. Examples of in-state purchases include utilities, fuel, groceries, lodging, and building



supplies. Hatcheries hire local construction companies for capital improvements and maintenance, support local transportation businesses, and use a wide variety of Alaska-based professional services firms.

Based on data provided by hatchery managers, annualized employment associated with hatchery operations is estimated at 345 jobs statewide. Annual payroll totaled \$15.5 million. Including multiplier effects, the total economic impact associated with hatchery employment and spending is estimated at 615 jobs and \$25 million in total annual labor income.

**Table 12. Total Employment and Labor Income
Associated with Hatchery Operations, 2012-2017 Averages**

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Hatchery Operations			
Employment	345	270	615
Labor Income	\$15.5 million	\$9.4 million	\$24.9 million

Direct seasonal employment is higher than average employment. It is estimated that peak seasonal employment is about 50 percent above the annual average, or over 500 workers.

Sport Fishing

Sport harvest of hatchery-produced salmon has a range of economic impacts, though those impacts are difficult to fully quantify. Alaska residents and visitors alike spend significant amounts of time and money for the opportunity to sport fish in Alaska. Among non-residents, some visitors come to Alaska for the primary purpose of sport fishing, spending thousands of dollars on transportation, lodging, food, gear, and charter or guiding services. Other non-resident visitors may purchase a half-day, a full day, or several days of guided fishing while seeing Alaska on a cruise or independent vacation. In these cases, the opportunity to fish may be one of several reasons for their trip to Alaska.

Estimates of spending by visitors who sport fish while in Alaska are available from the Alaska Visitors Statistics Program (AVSP). However, the challenge with measuring the role of hatchery-produced salmon in this spending is, first, isolating the value of all salmon in visitors' sport fishing-related spending, when visitors may also be pursuing halibut or other species as part of their charter fishing experience. The next complication is to determine the economic role of hatchery fish in visitors' salmon fishing experience. Availability of hatchery fish can vary from area to area – being the primary target in some areas and a secondary target (after natural runs) in other areas.

Finally, it is not necessarily the number of fish harvested that drives the economic impact of sport fishing — just as much money might be spent for sport harvest of five salmon as for ten. The experiential (qualitative) value of sport fishing is an important aspect to sport fishing in Alaska, and what brings visitors to the state.

Measuring the economic impact of resident spending in pursuit of sport fishing activities is equally complex. Residents buy boats, gear, fuel, licenses, and other items for the opportunity to catch fish and pursue other marine activities. As described elsewhere in this report, hatchery salmon are an important part of the sport



harvest, but allocating an appropriate share of all resident spending in Alaska on sport fishing (l fishing) to hatchery salmon is practically impossible.

Finally, personal use and subsistence-related harvest of hatchery salmon also have significant economic impacts. In addition to economic impacts related to spending on boats and fishing gear, personal use and subsistence fishing have important household food budget implications (not to mention important social and cultural values).

This study focuses on the economic impact of spending by non-Alaskan sport fishermen, in their guided and unguided efforts to catch salmon. In 2016, Alaska hosted 192,000 guided non-resident fishermen and 146,000 unguided fishermen (these numbers include some overlap; approximately 300,000 non-resident sportfishing licenses were sold in 2016). These fishermen brought new money to Alaska, in the same manner that commercially harvested hatchery salmon are sold to outside markets and draw new money into the state's economy.

Non-residents who fished in Alaska in 2016 spent a total of \$600 million while in the state, including guided and unguided fishermen, based on AVSP data. Recognizing the high level of uncertainty around the estimate, McDowell Group analysis suggests that approximately \$25 million of this spending can reasonably be attributed to hatchery-produced salmon, with about 40 percent of that spending in Southeast, 40 percent in Prince William Sound, with the balance elsewhere in the state. This estimate is intended to capture spending on lodging, food, transportation, charter/guides, licenses, gear (for unguided fishermen), and incidentals for visitors whose primary trip purpose is to fish in Alaska, and who fish in areas where hatchery fish are prominent. It is also intended to capture an appropriate share of spending by visitors whose primary trip purpose may not be fishing but is nevertheless a part of their Alaska experience.

The economic impact of \$25 million in visitor spending is estimated at 375 (annualized) jobs and just over \$16 million in total labor income, including all multiplier effects.

**Table 13. Total Employment and Labor Income
Associated with Non-Resident Sport Harvest of Hatchery-Produced Salmon**

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Non-Resident Sport Harvest			
Employment	285	90	375
Labor Income	\$10.5 million	\$5.7 million	\$16.2 million

As measures of the economic impact of sport harvest of hatchery-produced salmon, these estimates are conservative. The estimates do not include any economic activity associated with Alaska resident spending on sportfishing for hatchery salmon, which is substantial in Valdez, Seward, Juneau, Ketchikan, and other communities.



Summary of Statewide and Regional Economic Impacts

In total, including commercial fishing, processing, hatchery operations, and non-resident sport harvest of hatchery-produced salmon, Alaska's salmon hatcheries together accounted for an average of 4,710 jobs and \$218 million in labor income in Alaska, including direct, indirect, and induced effects. The total economic footprint of hatchery salmon, measured as economic output, is estimated at \$600 million annually.

Table 14. Total Annual Statewide Economic Impact of Alaska Salmon Hatcheries

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Commercial Fishing			
Employment	1,040	500	1,540
Labor Income	\$70.9 million	\$23.6 million	\$94.5 million
Seafood Processing			
Employment	1,360	820	2,180
Labor Income	\$52.2 million	\$29.6 million	\$81.8 million
Hatchery Operations			
Employment	345	270	615
Labor Income	\$15.5 million	\$9.4 million	\$24.9 million
Non-resident Sport Fishing			
Employment	285	90	375
Labor Income	\$10.5 million	\$5.7 million	\$16.2 million
Total Economic Impact			
Employment	3,030	1,680	4,710
Labor Income	\$149.1 million	\$68.3 million	\$217.5 million
Output	\$386.1 million	\$216.0 million	\$602.1 million

The employment impact estimate of 4,700 jobs is an annualized figure. The number of people who earn some income from the harvest of hatchery-produced salmon in Alaska is several times the annual average. More than 16,000 fishermen, processing employees, and hatchery workers can attribute some portion of their income to Alaska's salmon hatchery production. Thousands of additional support sector workers earn wages connected to Alaska hatchery production.



Southeast Alaska Hatchery Impacts

The economic impacts of hatchery produced salmon in Southeast Alaska are detailed in the following table. In, total, salmon hatcheries account for just under 2,000 jobs in the region and just over \$90 million in annual wages, including all multiplier effects.

Table 15. Economic Impact of Salmon Hatcheries in Southeast Alaska

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Commercial Fishing			
Employment	365	210	575
Labor Income	\$26.2 million	\$9.2 million	\$35.4 million
Seafood Processing			
Employment	585	375	960
Labor Income	\$22.1 million	\$14.4 million	\$36.5 million
Hatchery Operations			
Employment	165	125	290
Labor Income	\$7.8 million	\$4.5 million	\$12.3 million
Non-resident Sport Fishing			
Employment	115	35	150
Labor Income	\$4.2 million	\$2.3 million	\$6.5 million
Total Economic Impact			
Employment	1,230	745	1,975
Labor Income	\$60.4 million	\$30.3 million	\$90.7 million
Output	\$152.5 million	\$84.8 million	\$237.3 million



Prince William Sound Hatchery Impacts

Hatcheries in Prince William Sound generated economic activity that includes an annualized total of 2,200 jobs and \$104 million in annual labor income. Annual economic output totaled \$316 million. These economic impacts are spread throughout the Southcentral region, not just in PWS.

Table 16. Economic Impact of Prince William Sound Salmon Hatcheries

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Commercial Fishing			
Employment	590	260	850
Labor Income	\$40.4 million	\$12.8 million	\$53.1 million
Seafood Processing			
Employment	630	365	995
Labor Income	\$24.7 million	\$11.7 million	\$36.4 million
Hatchery Operations			
Employment	115	95	210
Labor Income	\$5.0 million	\$3.1 million	\$8.1 million
Non-resident Sport Fishing			
Employment	115	35	150
Labor Income	\$4.2 million	\$2.3 million	\$6.5 million
Total Economic Impact			
Employment	1,450	755	2,205
Labor Income	\$74.2 million	\$29.8 million	\$104.1 million
Output	\$203.4 million	\$112.9 million	\$316.3 million



Tax Revenue Impacts of Alaska's Salmon Hatcheries

Harvesting and processing activity connected to hatchery salmon generate local and state tax revenue. This section describes the key sources of tax revenue directly and indirectly supported by hatchery-produced salmon.

Fisheries Business Tax

Hatchery-produced salmon commercially harvested and landed in Alaska are subject to the State of Alaska Fisheries Business Tax — a 3.0 to 5.0 percent levy on the ex-vessel value of the fish. Half of revenue generated from this tax is retained by the State and the other half is shared with the community and/or borough where the salmon are landed.

Over the 2012 to 2017 period, harvest of hatchery-produced salmon generated an annual average of \$3.6 million in Fisheries Business Tax revenue, or nearly \$22 million in total. The State of Alaska received about \$1.8 million annually and local governments received an equal amount. The cities and/or boroughs of Kodiak, Valdez, Cordova, Seward, Sitka, Petersburg, Ketchikan, Haines, and Juneau are among the largest local government beneficiaries of hatchery-supported tax revenue.

Tax receipts fluctuate as harvest volumes and prices change year to year. The largest estimated annual revenue over the study period was \$5.5 million generated from a record-breaking season in 2013. These estimates are conservative as they exclude volume associated with cost recovery harvest and assume a rate of 3.0 percent: it is likely some hatchery salmon are subject to a slightly higher rate.

**Table 17. Estimated Fisheries Business Tax Revenue
from Hatchery-Produced Salmon by Component, 2012-2017**

	2012	2013	2014	2015	2016	2017	Total	Average
State	\$2.0	\$2.7	\$1.7	\$1.6	\$1.0	\$1.9	\$10.8	\$1.8
Local	\$2.0	\$2.7	\$1.7	\$1.6	\$1.0	\$1.9	\$10.8	\$1.8
Total	\$4.0	\$5.5	\$3.3	\$3.2	\$2.0	\$3.7	\$21.7	\$3.6

Note: Values have been rounded. Includes only common property harvested salmon. Assumes a 3.0 percent tax rate.
Source: McDowell Group estimates based on ADF&G and DOR data and information.

Local Taxes

Though difficult to quantify, hatchery salmon generate additional local revenue through raw fish, property, and sales taxes paid by commercial fishermen, charter fishermen, seafood processors, hatchery associations, and support sector businesses and employees.

Communities with a raw fish tax generate revenue from local landings of hatchery salmon. For example, hatchery salmon delivered to processors within the Kodiak Island Borough are subject to a 1.075 percent raw fish tax. In 2017, this tax generated \$1.3 million from all species, including hatchery salmon.⁶

⁶ <https://www.commerce.alaska.gov/web/Portals/4/pub/Alaska%20Taxable%20Supplement%2019.18%20Reduced.pdf?ver=2018-01-11-150658-867>



Seafood processing plants generate property tax revenue in communities across Alaska. In 2017 five property tax payers in the city of Kodiak were processing companies.⁷ Silver Bay Seafood's new plant in Valdez (valued at more than \$40 million) is among the city's largest non-oil property tax payer; the company is also the largest property tax payer in Sitka.⁸ Other processing plants in Seward, Cordova, Ketchikan, and elsewhere use hatchery salmon as part of their annual production. The availability of hatchery salmon helps preserve the financial viability of processing operations, which maintains tax revenue flowing each year to local communities.

Additional revenue is supported when fishermen and processors that handle hatchery salmon purchase goods and services subject to sales tax. The communities of Kodiak (7 percent sales tax), Cordova (6 percent), Seward (4 percent), Sitka (5 to 6 percent), Juneau (5 percent), and Ketchikan (4 percent) are among the Alaska cities benefiting indirectly from hatchery salmon.

⁷ https://www.city.kodiak.ak.us/sites/default/files/fileattachments/finance/page/352/kodiak_city_of_cafr_final_2017.pdf

⁸ <http://www.cityofsitka.com/government/departments/finance/documents/CityandBoroughofSitkaFY2016CAFR.pdf>

Submitted By
Sara MacDougall
Submitted On
11/15/2021 3:58:35 PM
Affiliation



PC206
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!

Submitted By
Sarah Nelson
Submitted On
11/14/2021 8:25:36 PM
Affiliation



PC207
1 of 1

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Proposal 6 oppose Proposal 7 strongly oppose Proposal 8 strongly oppose Proposal 9 strongly 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 18 strongly support
Proposal 20 strongly oppose Proposal 21 strongly support Proposal 22 strongly support



From: [Scott Willison](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Comments for Alaska Sportfishing Rule Change Proposals #39 and #40
Date: Tuesday, October 26, 2021 10:43:18 AM

Proposal #39, Ibeck Creek:

If fishing pressure is adversely impacting coho escapement on the upper section of Ibeck (if supported by redd count or smolt outmigration data) I'd like to see other management strategies implemented to mitigate the impacts before an outright closure, such as catch and release, reduced harvest or a bait ban.

Proposal #40, 18-Mile or Silver Creek: Similarly to Ibeck Creek, I'd like to see other management strategies implemented such as catch and release, reduced harvest or bait ban before forcing an all out closure. I live in Washington State where our management tendencies have historically leaned towards all out closures. This leaves few fishing options and concentrates a lot of additional pressure on the few systems that remain open. I travel with the same group of 4 friends to Cordova every September to fish for coho and enjoy the natural beauty of this area and the tranquil hike into lower 18 Mile. If these fisheries are closed we will no longer make the trip as Ibeck and 18 Mile are the two watersheds that tend to remain in the best shape during our trip, so we often end up there when the Eyak and Alaganik are blown out.

Thanks for your time and thoughts.

Regards,
Scott Willison
scott@theconfluenceflyhsop.com

Submitted By
Sean Den Adel
Submitted On
3/2/2021 11:17:57 PM
Affiliation



PC209
1 of 1

Due to the ongoing global pandemic and the recent outbreak in Cordova caused by a city official, I strongly feel the 2021 BOF meeting should take place on zoom or a similar platform. Now is not the time to hold large public meetings in rural PWS communities. The public and stakeholders have the right to weigh in on the decisions of the board but the communities health is first and foremost!



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial salmon fisheries of the Prince William Sound region as well as in processing.

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,

Sentoso Sendjaja
sentoso.sendjaja@oceanbeauty.com

Submitted By
Shawn Chura
Submitted On
11/8/2021 9:14:24 AM
Affiliation

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PC211
1 of 1

Proposal 6 - Oppose, Proposal 7 - Strongly oppose, Proposal 8 - Oppose, Proposal 9 - Oppose, Proposals 10, 11, 12, 13, 14, 15, 16, 17, 19, 20 - Strongly oppose all. Proposal 18 - Strongly support, Proposals 21 and 22 - Support both.

Submitted By
Shawn Gilman
Submitted On
11/9/2021 10:33:46 AM
Affiliation



PC212
1 of 7

Proposal 7.

I am submitting comments as I have for the many cycles I have observed over the past 40 years. Proposal 7 drafted by me is an attempt to get the Board to address the upside down world that commercialized subsistence creates. Commercialized subsistence funnels new participants drawn by advertisements to partake in a subsistence fishery in a parody of subsistence activity. Many if not most of these participants arrive from non subsistence areas. My thoughts go to why I cannot go to Anchorage on a guided moose hunt, getting on the subsistence bus, be driven to the location of the game, handed a rifle, shown how to shoot, then shoot a moose? I believe the answer to that question as well as reviewing the criteria on how the board arrives at creating non subsistence areas helps frame what is happening. The 12 criteria are

1. Social and economic structure of area
2. Economic stability of the area
3. Employment information for the area
4. Cash income information for the area
5. Cost of goods and services from the area
6. Variety of species used in the area
7. Seasonality of the economy in the area
8. How many area residents participate in harvest
9. Harvest levels by area resident
10. Values associated with harvest
11. Areas of harvest
12. Extent of sharing by area residents

The disconnect between intent and reality of subsistence is more glaring every year. The staff comment that boats have existed in the dipnet fishery since 1984 in regards to my proposal and in every proposal that begs the Board to do something constructive regarding the new power boat dipnet/rawl activity ignores the change in nature of these boats and the areas and activities in which they engage. The comment also seems to belittle the impacts specifically to proposal #7 the huge increase in credit card activity boats versus the "1984" boat activity and its impact on subsistence law intent. I quote from a 1996 subsistence report to the Board authored by Steven Behnke. "For more than 20 years the state has wrestled with the question of how to protect the subsistence taking, uses and practices of the people in communities with the greatest dependence and historic reliance upon fish and wildlife for domestic consumption." My proposal ask the Board to wrestle with and steer the direction of subsistence in the future by stopping this commercialization before it becomes the norm throughout the copper River drainage including the mouth of the river. Adfg has not fully addressed the effect that failing to adopting this proposal will have on the resource.

Submitted By
Shawn Gilman
Submitted On
11/9/2021 10:46:58 AM
Affiliation



PC212
2 of 7

I ask the Board to oppose proposal 45 as it is contrary to the compromise that happened when the board lowered the separation distance between setnets inside the main bay subdistrict from 100 fathoms to 50 fathoms. They acknowledged that this shrunk the area available to the predominant gear type drift gillnets by as much as 50% or more and agreed that the beach was available to the drift fleet especially on clean ups and that 50 fathoms was 50 fathoms. The there is no room between two setnets argument to lower to 30 fathoms is just an allocative grab as setnets are not always 100 fathoms apart exactly nor are there always two that are 100 fathoms apart. This creates opportunity to the drift fleet to use the other 50 fathoms in the absence of a second set net. Lowering this would decrease opportunity to the drift fleet and increase opportunity to the set gillnet fleet which already enjoys above allocation average catches.

Submitted By
Shawn Gilman
Submitted On
11/10/2021 4:21:35 PM
Affiliation



PC212
3 of 7

i ask the Board to support proposal # 6. The need for inseason reporting is imperative as pressure increases on these fisheries. Despite Adfg managers assurance that all is fine and everyone reports what they catch. Despite saying they just know what is happening and they can expand numbers as needed. It really seems apparent to people in the know that it is time for change and more accountability. These fisheries have seen expanded commercial activity. There are online forums that share where to fish , how to fish and how many are being caught at the moment which is a fairly new tool and it is rapidly changing how people can be more direct and effective in their efforts. It certainly does not seem onerous or a stretch to ask for timely and accurate reporting in 2021. The ability to fine tune time and area for all these fisheries with increased pressure would be greatly enhanced with better information. Adfg's ability to access timely information will only become more important as new personnel comes online. The years of experience that allow a manager to look everyone in the eye and say they do not need timely and accurate numbers because they can just feel what is being harvested on the river every day may be lost . Thank you for your time and efforts.

Submitted By
Shawn Gilman
Submitted On
11/15/2021 8:44:34 PM
Affiliation



PC212
4 of 7

I would ask the Board to support Proposal 43. Being involved in the developement of the Plan that took historic catch over time before hatcheries and showed that Drift Gillnet harvested 50 percent, Seine 49.5 percent and Set gillnet .5 percent roughly. These numbers I believe even included a couple original early hatchery return years in for the Seine fleet. That said I have spent the last 40 years as a drift gillnet participant and have continually seen how the Drift fleet is under constant pressure from Seine and Set gillnet groups that fail to remember or realize the original numbers and to this day continually go over their allocations that are above the original historic averages. Please pass this proposal in good faith or at the very least put in motion a vigorous review of the current allocation plan and any new information that might be causing inequity such as Seine fleet bonus structures designed to avoid the COAR report, fishery relief funds that in effect pay for fish not caught while the lack of fish still stays on the allocation plan calculations in effect doubling the benefit to one gear group specifically the Seine fleet in the past 5 year calculations. thank you for your time and efforts.

Submitted By
Shawn Gilman
Submitted On
11/15/2021 9:02:42 PM
Affiliation



PC212
5 of 7

I ask the Board to oppose Proposal 5, The proposer has continually tried to politicize king salmon management on the Copper River in past cycles with conservation being the word used when they really mean reallocation. At the last Board cycle a similar proposal was proposed and supported by KRSA ignoring ADFG's own recommendations to lower the escapement goal for King salmon. If one was to really look at the history and numbers throughout time, it is apparent that a vigorous and full force commercial fishery occurred while keeping the Copper River King salmon stocks some of the healthiest in the State. This begs the question, did reallocation upriver and increasing commercial activity in the spawning beds, along with overescapement of sockeye due to "mandatory restrictions and political pressure on ADFG " cause more harm than good? Properly managed commercial fisheries create more opportunity over time for all users and the numbers prove it as well as numerous historic lessons from around the state on politicized fisheries versus management based on actual conditions and runs strengths. Thank you for your time and efforts.

Submitted By
Shawn Gilman
Submitted On
11/15/2021 9:19:54 PM
Affiliation



PC212
6 of 7

I ask the Board to support proposal 42. The set gillnet fleet has continually gone over their allocation that was increased from a historic less than .05% and increased to 1% in the original allocation plan basically doubling it until 2005. Due to low pink prices for the Seine fleet over a period of years the setnet gear group had harvested 7-10% of the PWS total value in the years leading up to 2005 so the board on a whim and not much discussion decided 4 percent was good. This has been a fortunate bump for the setnet fleet which enjoys their historic catch X400 percent and then some on average unlike any other gear group in the plan. The drift fleet which also had increased percentage catches of the total value due to low pink prices affecting the Seine fleets percentage did NOT get any increase in allocation to be clear. thank you for your time and efforts.

Submitted By
Shawn Gilman
Submitted On
11/15/2021 9:48:22 PM
Affiliation



PC212
7 of 7

I ask the Board to support proposal 41. The intent of mandatory inside closures was to 'save' king salmon and early run sockeye or so the saying goes when reallocation was quite often the intent. Mandatory inside closures ties ADFG's hands even if unnecessary and as shown they are more than willing and able to use them without being mandated. I also have seen the Department and Board say that mandatory measures for upriver fisheries were unnecessary. The Dept has testified that they are able to adjust to seasonal run strengths, weather and pressure without regulation. There are various proposals in the book that seek to do away with mandatory upriver closures and expand upriver areas and opportunities. I ask that the Board be consistent in regulation revisions or adoptions. I also ask the Board to review the history of the Copper River catch and escapements along with returns in concert with the restrictions that have been put in place over the years. I believe this will show heavy escapements of early sockeye and kings in the name of conservation/allocation are at least partially to blame for some of the weaker returns and lack of opportunity for all user's experienced recently. A properly managed commercial fishery creates more opportunity over time for all user groups. The numbers bear that out and hopefully will be acknowledged at this meeting. Thank you for your time and efforts.



November 15, 2021

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Comments on Proposals

Dear Alaska Board of Fisheries Members:

Silver Bay Seafoods is opposed to Agenda Proposals 49-55 currently under consideration by the Alaska Board of Fisheries (board) at its Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish Regulatory Meeting

Silver Bay Seafoods is a fisherman-owned, Alaska seafood processing company. We operate six processing facilities in coastal Alaska communities. Our Valdez operation supports purse seine fishermen, crew, communities, and businesses who heavily rely on Prince William Sound salmon fisheries.

Proposals 49-53 seek to limit production of hatchery produced sockeye, coho, pink, and chum salmon – all of which are harvested by subsistence, personal use, sport, and commercial stakeholders and serve to supplement harvest of wild salmon stocks. The Alaska Salmon Hatchery Program has set an extremely high bar for conservative and sustainable management of salmon enhancement in Alaska. In fact, protection of wild salmon stocks has been at the forefront of the Alaska Salmon Hatchery Program since inception. This isn't just a nice idea, but a necessity, as all stakeholders rely on healthy, sustainable, wild salmon returns.

Wild and hatchery stocks are producing salmon returns that offer critical food and economic opportunities for remote Alaska communities that need it most. The Alaska Hatchery Program is an effective and celebrated success. There is no scientific evidence of harm to wild Alaska stocks. Contrary to the narrative in these proposals, this program has resulted in healthy, wild and hatchery salmon returns to the region for many years. To be certain of this observation of no harm to wild stocks, our Alaska fisheries management agency (ADF&G) and industry leaders have funded a comprehensive, multi-year research project to collect additional, targeted information about the relationship between hatchery and wild salmon stocks in Alaska. This project is ongoing, but in the meantime and since inception, Alaska has adhered to strong, conservative policies for sustainable management of our wild and enhanced salmon stocks. Therefore, enacting overly burdensome policies or regulations (such as those outlined in proposals 49-53) without supporting scientific data would be extremely harmful to Alaskans. As

Sitka ♦ Craig ♦ Valdez ♦ Naknek ♦ False Pass ♦ Kodiak



mentioned by the Alaska Department of Fish and Game (ADF&G) the fisheries research and management agency granted the authority to assess this in the best interest of Alaska and our sustainable fisheries resource, many of the concerns raised in proposals 49-53, are already sufficiently addressed through a rigorous, public permitting process. We support the department's analysis and ask you to respect their professional input on these issues.

Proposals 54 and 55 reduce salmon production by 24% of the level permitted in 2000. The most alarming impacts from adopting these changes are 1) the redirection of harvest from supplemental enhancement stocks to wild stocks, and 2) the dramatically negative impact to this region's economic opportunity by reducing enhanced salmon production by 25% with no demonstrated benefit to wild salmon stocks. Hence, the likely and significant harm would outweigh the unsubstantiated benefit.

We respect the role board members have in conserving, protection and allocating Alaska's salmon resources. We encourage board members to make educated decisions about these important issues by reviewing all public comment, digesting the scientific data presented by ADF&G and truly weighing the impacts your decisions have on Alaskans and Alaska's sustainable salmon resource. Given the information currently available, Silver Bay Seafoods strongly opposes adoption of proposals 49-55.

Thank you for the opportunity to comment.

Respectfully,

A handwritten signature in blue ink that reads "Abby Fredrick".

Abby Fredrick
Director of Communications

Submitted By
Simon Malinski
Submitted On
11/14/2021 3:47:47 PM
Affiliation



PC214
1 of 1

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Waconia , Minnesota 55387

Hello,

My name is Blake Yorde. I've been a fishing guide in Copper Center, Alaska and surrounding area since 2007. The entire Copper basin relies on the salmon runs of the upper Copper River drainages. Most importantly to us as sportfishermen, the King salmon runs. I know there's not been a lot of representation for sportfishermen from the Valley in years past, mostly I believe because there's truly not many of us. However, the economic impact we have with our clientele coming to the state of AK and supporting the Copper Basin are immeasurable.

Proposal 5: Strongly Oppose

As you may know, Copper Center is situated at the confluence of the Klutina and Copper Rivers. Salmon is an important subsistence and sport fishing resource for many community members and provides a critical economy for many businesses in the Copper Basin related to fishing and tourism – restaurants, gas stations, bed & breakfasts, grocery stores, etc. The proposal presented by the Kenai River Sportfishing Association (KRSA) to raise the limit goal could have a serious impact to our community members and their livelihoods. Further, we don't see how the KRSA could have a better understanding of managing fish in the Copper River tributaries than State of Alaska Department of Fish & Game biologists, who in 2020 recommended an escapement of 21,000 – 31,000 fish. Proposal #5 would raise the escapement goal for king salmon from the current escapement goal of over 21,000 - 31,000 king salmon to 24,000 – 40,000 king salmon: essentially making it very difficult to sportfish any of the Upper Copper tributaries (i.e., Gulkana, Klutina, & Tonsina Rivers). Fish and Game has a very conservative management regime in place in the Copper Basin and does not hesitate to introduce precautionary measures like limiting harvest, restricting bait, or mandating catch & release only – or even closing fishing for king salmon entirely – if returns are not where they should be. As the owner of a business centered on sportfishing, and more generally as a person invested in the sustainability of this species for generations to come, I have always been impressed by ADF&G's management of this resource and feel that we should trust their data and knowledge moving forward.

Proposal 8: Agree

Proposal 8 states that there will be no dipnetting in the confluence 500 yd below and 100 yd upstream of any tributary in the upper Copper River. ADFG marks the tributaries in a straight line from top to bottom of the confluence. This method allows for sections of the river to grow past that line, which causes some confusion on where you can and cannot dipnet. Changing these boundaries will alleviate any confusion and allow the tributary mouth to change year to year. I see firsthand that these waters are prime conditions for fish to gather and prep for their push up to the spawning grounds. Dipnetting these areas seems to be akin to "shooting fish in a barrel." For example: The smaller tributaries are closed to all fishing for salmon within a quarter mile. Why would it be different along the copper in the larger tributaries?

Proposal 41: Strongly Oppose

This proposal to lift the inside boundaries for Kings is far reached and dangerous. With the difficulties of managing King Salmon and total numbers not meeting expectations, to open the natural king territory would do significant damage to the fish population. Commercial fishing inherently has the potential to do more harm to the fishery than any other user group just due to the method of harvest and the number of fish that they take. We see king returns trending downwards recently and I cannot understand the reasoning behind a proposal like this.

Proposal 32: Agree

If the rainbow populations on the Gulkana are sustainable, we should be allowed to keep trout. Fishing these waters on the regular, the Gulkana does not have the fishing pressure it got in the past.

Thank you for your time, and more importantly, your support for sportfishing.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Homer and commercial and sport fish. My family homesteaded in Homer, Alaska in 1938 and began our fishing employment that year, hiking off the homestead to go fishing and also work in the canneries on the Kenai Peninsula. In 1985 my husband and I sold our Cook Inlet salmon permit and bought a Prince William Sound seine permit, took our small children with us and have been seining in the Sound ever since, our 36th year of seining was last summer. We have watched the PWS hatchery program grow and mature in the years we have fished and we're grateful for the hard work and dedication to the hatcheries that the fishermen and regional workers have put into them. The hatcheries have supplemented the wild stocks and made healthy and productive fisheries for both commercial and sport fisheries. We totally support the hatchery program and hope that it continues for the benefit of all the people of the region and the State of Alaska as well. We have been proud to see very large wild salmon stocks in the rivers and streams during these years since the hatcheries have started. The hatcheries helped overcome the decline of wild salmon due to the uplifting of the Sound due to the 1964 earthquake and the fluctuations in weather that froze out salmon streams and it was the visionary fishermen of Prince William Sound who started the hatcheries, something we should all be proud of. During a hatchery summit meeting in 2018 Clem Tillion made a passionate plea for the hatcheries to continue for the benefit of everyone, plus he reminded us of how many pink salmon Russian, North Korea and other Asian countries are producing (far more than we are) and said that if we stop we will simply lose our place in the markets of the world and in our own economy. We should be keeping that information in mind as we look at the salmon situation in the world. As far as the number of pink salmon PWSAC is producing, please remember that only a portion of the numbers we release make it out of the Sound as predation is a huge factor with marine mammals eating a huge number of them. Whales in particular have discovered the spring releases and eat an alarming amount. For more information on the survival rate of the salmon releases please read the studies that have been done on this matter which helps to understand why it is critical to have large releases because a much smaller percentage will actually survive and grow into adult salmon that will return to the Sound. I think it is important that everyone involved in these decisions go back and look at the information and testimonies from the 2018 emergency hatchery summit because so much quality research was presented and we should be making these decision with true solid information for the benefit of all the fishermen, the Alaskan towns and the State. Thank you very much for taking the time to read this and for making informed and wise decisions. Also, every seine boat employs anywhere from 3 to 5 crew members, each who work for a percentage of the catch, anywhere from 9% to 12% for each person. That makes the fisheries a great opportunity for young people to make a good living which our crew members have used to pay off college debt, buy business and build homes, a fact we are proud of because we know our one permit has contributed



greatly to the economies of Alaskan communities and young families. If you want direct testimonies from over one hundred of our crew members please contact us and we will provide you with their information.

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.

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.

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,

Sonja Corazza
Sonja907@gmail.com
(907) 202-1104



RAC SC 21015.DP

MAY 13 2021

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

RE: PUBLIC COMMENTS ON 2020-2021 ALASKA BOARD OF FISHERIES PROPOSALS

Dear Alaska Board of Fisheries Members:

The Southcentral Alaska Subsistence Regional Advisory Council (Council) is one of ten regional advisory councils formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review, and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southcentral Alaska region.

At its February 24-25, 2021 meeting, the Council reviewed and discussed several Alaska Board of Fisheries (BOF) proposals for Prince William Sound finfish. Many of the issues addressed by these BOF proposals were similar to issues presented in Federal subsistence fisheries proposals, which came before the Council during its fall 2020 regulatory meeting. These Federal subsistence fisheries proposals were presented to the Council as potential modifications on the Federal subsistence fishery and the Council made recommendations to the Federal Subsistence Board on them.

Now, the Council would like to offer comments on specific BOF proposals. The Council takes its responsibility to provide a meaningful preference for Federal subsistence users seriously and is only willing to consider the proposed restrictions **after** they are first adopted in the State managed subsistence and personal use fisheries. Although there may be value to the BOF proposals, this Council cannot support restrictions placed on Federally qualified subsistence users until restrictions are implemented and enforced on lower-priority fisheries.

The Council specifically offers the following comments to be considered at the upcoming Alaska BOF meeting addressing these proposals:

**BOF Proposal 5: OPPOSE**

The Council is opposed to modifying the Copper River Salmon Management Policy in any way. There has been a fairly low abundance of King Salmon over the last 10 years and if this policy is modified by lowering the 'Optimum Escapement Goal,' to manage for the 10-year rolling average, the State would be managing for a declining fish population. The existing policy should continue to provide for a minimum of 24,000 King Salmon (Sustainable Escapement Goal) in the system. Therefore, the Council opposes BOF Proposal 5 and supports maintaining the status quo for the Copper River Salmon Management Policy.

BOF Proposal 6: SUPPORT

The Council believes that due to the low salmon run forecast, there is a need for personal use and sport fish daily reporting to keep managers informed about conditions in the river to aid in State resource management decisions.

BOF Proposal 7: SUPPORT

The Council recognizes that guiding activity has significantly increased in recent years, specifically in the Chitina area, and it is reasonably expected to continue to increase in the future. Based on the information provided at its recent meeting, the Council felt there was a conservation concern based on the low runs last year for the Upper Copper River and the State's forecast for next season. This proposal would place more State-level restrictions on a resource that has been proven to be unpredictable and at times, diminishing.

BOF Proposal 8: SUPPORT

The Council felt that this proposal would help relieve some of the conflicts between user groups. Fish often concentrate in certain areas, specifically King Salmon, at the mouth of the Gulkana River; and, if dipnetting is allowed to increase near the tributary mouths of the Upper Copper River, it could have a significant effect on the ability for other user groups to harvest fish.

BOF Proposal 9 & 10: SUPPORT

The Council found that these proposals would significantly affect the harvest by Upper Copper River users. Dipnetting from a boat is an easy way to catch a large amount of fish. Prohibiting dipnetting from a boat at the State-level will have a positive impact on the ability of salmon to migrate to their spawning grounds.

BOF Proposal 14 & 15: SUPPORT

The Council is concerned about high salmon mortality, especially King Salmon. The Council heard anecdotal evidence of 'high-grading' and other activities associated with dipnetting, whereby its very nature decreases the probability of survival. The Council recognizes the need to protect the fishery resource and supports State regulations that prohibit or limit the use of monofilament and multifilament mesh associated with increased risk of mortality. It is important that sufficient numbers of healthy fish survive to reach their spawning grounds.

BOF Proposal 16: SUPPORT

The Council believes devices such as depth or fish finders offer only limited utility to target fish; however, it recognized that these devices may have an impact in the future as technology continues to evolve. As a safety issue, one needs to be able to 'read' the river instead of trying to



navigate with a device that might not provide adequate navigational information due to the river being silty. Fishing from a boat has become more popular and using devices could enable fishers to target and harvest a large amount of fish preventing enough King and Sockeye salmon to reach their spawning grounds. The Council recognizes that there may law enforcement challenges to prohibiting these devices from being on boats.

BOF Proposal 18: OPPOSE

The Council believes extending the lower boundary and allowing boat dipnetters a longer continuous drift (which may be viewed as trawling), will encourage more participation and result in increased harvests. This will affect the upriver fisheries and migration of King and Sockeye salmon. An extension could also make it more challenging for the Native Village of Eyak (NVE) to gather crucial mark/recapture program data. If there is no way to determine if harvests occurred above or below the NVE research fishwheels, the number of King Salmon reported at the end of the year may not be statistically valid. Such an inaccuracy could affect the management of this important resource. Lastly, this area of the river is difficult to read and extending the boundary could create an increased safety risk. There should not be a fishery established or extended in an area where people are transitioning.

BOF Proposal 22: OPPOSE

The Council believes that the purpose behind this proposal is to have the BOF review the customary and traditional use determination for other less desirable finfish in an attempt to ultimately request a customary and traditional use determination for salmon in this area. The Council does not support making a customary and traditional use determination for salmon because it would prohibit the subsistence fishery from being shut down in times of low abundance. In the State system, everyone is a subsistence user and it is problematic for those outside the Chitina Subdistrict to have as much say and access to the resource as those living locally and depend on the fish in that system do. This increase in access could also be detrimental to the fish stocks and cause future conservation concerns.

The Council appreciates the opportunity to comment on these BOF proposals and recognizes the importance of both State and Federal management of fisheries resources that are relied upon by Southcentral subsistence users. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-209-7817, deanna.perry@usda.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Greg Encelewski".

Richard Greg Encelewski,
Chair

cc: Federal Subsistence Board
Southcentral Alaska Subsistence Regional Advisory Council Members
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management



Hannah Voorhees Acting Policy Coordinator, Office of Subsistence Management
Tom Kron, Statewide Support Division Supervisor, Office of Subsistence Management
Katerina Wessels, Council Coordination Division Supervisor,
Office of Subsistence Management
DeAnna Perry, Subsistence Council Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison and Acting Fisheries Division Supervisor,
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



Southeast Alaska Fishermen's Alliance



PC217
1 of 2

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

November 12, 2021

Alaska Board of Fisheries

Board Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Re: Comments on Prince William Sound Board of Fish Proposals

Dear Chair Carlson-Van Dort and Board of Fisheries members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a non-profit commercial fishing association representing our 330+ members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska but also includes members involved in the Prince William Sound (PWS) salmon drift gillnet fishery and longline fisheries throughout the state.

Proposal #5: OPPOSE - Change to an OEG escapement goal.

ADF&G's analysis of this proposal in RC 2 requesting the implementation of an Optimal Escapement Goal (OEG) would reduce long-term production of Copper River King salmon. In-river harvesting would not be liberalized until a higher number of fish were estimated to be in-river, reducing opportunity. There is something else happening to Chinook salmon throughout their range in Alaska rather than ADF&G management or the type of escapement goal.

Proposals #49, 50, 51, 52, 53, 54, & 55: OPPOSE - Changes to Hatcheries.

We will address our opposition to proposals #49-55, the proposals as a group rather than individually since many of the same factors exist for each of the proposals. As stated in the ADF&G comments RC 2, the Department opposes these proposals and states that in the permitting process the concerns raised in these proposals have been considered. Included in the hatchery permitting process is a public process and a department review. That review,



considered the concerns raised in the proposal including the need to minimize negative interactions between hatchery-produced and wild salmon, minimize straying and implementing harvest practices targeting hatchery produced salmon such that they do not negatively affect wild salmon escapements. Hatcheries provide many benefits including reducing harvest pressure on wild stocks as the hatchery release sites move a lot of the effort to the hatchery production instead of wild stocks. The hatchery program was developed by the State to supplement natural salmon production, not replace salmon, or displace it, nor to cause harm to wild stock production. Increase salmon abundance provides economic benefit and stability to the commercial salmon fleet. In addition, harvest opportunities are provided to all user groups.

Proposals #54 & #55 are slightly different in asking for a reduction of hatchery salmon to 24% of the level permitted in 2000 effectively reducing the hatchery production from 3.3 million fish to 800,000 fish impacting all user groups. Proposals similar to this have been considered most Board cycles and, in the end, not been acted on. The Alaska Department of Law in an informal Attorney General opinion¹ (Nov 6, 1997; 661-98-0127) has laid out the authorities of the Board of Fish and the Department of Fish regarding hatchery permitting and operations. This opinion clearly states that the legislative scheme for the regulation of private, nonprofit hatcheries vests the most detailed, comprehensive authority in the commissioner and department. The Legislature significantly restricted that authority by an amendment to AS 16.10.440(b) in 1979. This restriction provided the Board with more indirect authority over hatchery production but Board action that effectively revokes or prevents the issuance of a hatchery permit is probably not authorized. This would include reducing production to such a level as to make the hatchery unable to operate effectively revoking the permit.

Thank you for your consideration of our positions on these proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen
Executive Director

¹ http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/july_petitions/dol_1997_memo.pdf



Southern SE Regional Aquaculture Association

14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348

November 5, 2021

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair

By Electronic Copy Only: dfg.bof.comments@alaska.gov

Re: Comments on Proposal 55 – DO NOT PASS

Dear Chairman Carlson-Van Dort and members of the Board of Fisheries,

Thank you for the opportunity to comment on the above-referenced Proposal. Southern Southeast Regional Aquaculture Association (hereafter “SSRAA”) is a regional non-profit salmon hatchery organization formed under state and federal law, and which was originally incorporated in 1976. SSRAA, along with the other regional hatchery associations in the State, along with the associated Private Non-Profit (hereafter “PNP”) salmon hatcheries in Alaska, have a substantial interest in the outcome of this proposal. Proposal 55 is substantially similar to items previously submitted to the Board. In turn, SSRAA has made similar comments to these in those situations as well.

The Board’s response to this item is exceptionally critical to Alaskans - perhaps more than any of us even realizes or understands. We implore you to carefully consider the potential impact of this proposed reduction in hatchery production. Affirming this proposal would encourage and amplify the message of those who would dismantle Alaska’s salmon hatchery system despite obvious evidence to the contrary – that overall hatchery production levels have been steady for decades, a time period which encompasses many record-breaking returns of both hatchery and wild salmon.

Proposal 55 should not be taken seriously for a large number of reasons, but to highlight one: the damage that this action would cause if granted is truly astonishing. Among the damage: aquaculture associations have taken out infrastructure and operating loans from the Department of Commerce as well as from commercial lenders... loans that were contingent upon utilization of the permitted capacity for each organization. If the ability to produce over 37% these fish evaporates with the stroke of a pen, a catastrophic chain of events would cascade upon hatchery organizations and Alaska’s commercial fishing industry. And then down upon fishermen, their families and their employees and suppliers.



To highlight the economic output of SSRAA, which of course is only one of the statewide group of hatchery associations, please note the following figures from a recent economic analysis:

- Annual harvests of SSRAA salmon in common property fisheries in the period 2013 to 2017 averaged 22 million pounds, with an ex-vessel value of \$16.8 million. SSRAA's total economic impact in 2017 was estimated at 680 jobs and \$32 million in labor income tied to direct impacts in commercial fishing, seafood processing, nonresident sportfishing and SSRAA's own spending and employment.
- SSRAA's relative contribution to harvest values is influenced by year-to-year variations in the abundance of wild pink salmon. SSRAA's peak contributions - more than 40 percent of harvest value in 2017, for example - occur in years with low pink salmon abundance. In 2013, a year with near-record pink salmon abundance, SSRAA contributed 13 percent of regional salmon harvest value.
- Total economic output associated with SSRAA and the salmon it produces was about \$70 million in 2017. Output is a measure of total economic activity, including all labor income, spending on supplies and services, and related multiplier effects.

In addition to SSRAA's importance to Southeast Alaska's commercial fisheries, sport harvest of SSRAA salmon has a significant impact on the region's economy. Resident anglers who target SSRAA fish spend money on boats, fishing gear, fuel, and supplies, while non-resident anglers often hire local charter fishing companies that source many supplies locally and provide jobs to local residents.

SSRAA urges the Board to review the relevant data and truly understand what a massive impact it would be for the economy and culture of Alaska to have its hatchery programs dismantled through adoption of this proposal.

Thank you for your attention to these issues.

Again, SSRAA vigorously opposes Proposal 55.

Sincerely,

David Landis
SSRAA General Manager

Submitted By
Stephen Jansen
Submitted On
11/15/2021 5:12:10 PM
Affiliation



PC219
1 of 1

Phone
9072277096
Email
stephen_jansen@hotmail.com
Address
9850 Conifer St
Anchorage, Alaska 99507

To the Board of Fisheries: I would like to voice my strong opposition to proposals which reduce, restrict or outright ban the use of a boat to utilize the Glenallen and Chitina sub-district subsistence and personal use fisheries on the Copper River. Specifically proposals 9-15 and 17. As with most natural resources in this state an enlarging population is leading to increased competition among different user groups for finite resources. The above proposals are nothing, however, but thinly-veiled attempts by one such user group to hoard fish for it's own interest at the expense of another. Furthermore the constitutionality of such proposals is dubious at best given the mandate to manage Alaska's natural fish and game resources for the benefit of **ALL ALASKAN'S**. For more than a decade I have participated in Copper River personal use or subsistence fisheries from a boat. In every single one of those years I have personally fished with Elder Alaskans whose physical condition would prevent them from walking the bank or managing the heavier nets needed to fish from the shore. I have also more recently had the pleasure of introducing my children to this wonderful fishery, giving them the satisfaction of harvesting their own sockeye. It is an amazing thing to see them light up at the dinner table and proudly tell their mother how they caught the very fish they were eating tonight. Taking away the boat would effectively exclude these older and younger Alaskans from these fisheries. This would be a travesty as there is no valid management objective that eliminating the use of boats can achieve which cannot be better met by other measures such as limit reductions. Please do not take away my right to fish. Please vote no on these proposals.

Stephen Jansen



Madam Chair and Board of Fisheries Members,

I created proposal 88 and now no longer support it. I submitted the proposal on February 25, 2020 before the impacts of Covid hit the sport fishery. I no longer support it because in the aftermath of Covid, I doubt the allocation criteria spelled out in **Alaska Statutes 16.05.251**, can be met.

Below is the criteria list from 16.05.251

(1) the history of each personal use, sport, guided sport, and commercial fishery;

In 2020, despite increased sport bag limits, the fishery could not catch their allocation of kings due to covid 19 impacts. In 2021 the department augmented the current plan drastically to ensure the sport fishery caught its entire allocation because of covid 19 impacts.

When the most recent history of the sport fishery harvest is considered it can be easily concluded that more fish allocated for the fishery is not necessary nor the solution to the fishery's current problems. It would also be wrong to rely on past harvest history since there is no way of knowing what the harvest trend of the fishery will be in the aftermath of covid. It could be significantly different and there is no way to make an accurate prediction. Allocation changes would be better addressed when the sport fishery is no longer harassed by the pandemic.

(2) the number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;

Predicting the number of participants to participate in the future would be highly debatable and speculative. The covid pandemic is going to be with the world for quite some time according to health experts. Covid will most likely impact travel to Alaska for several years. To what extent who is to say? The delta variant of the covid virus created another pandemic within a pandemic. A new variant unsusceptible to the new vaccines could easily throw the country in to another economic crash similar to 2020 in a matter of weeks. So, to reasonably predict any accurate numbers of future participation by nonresidents would be difficult if not impossible.



(3) the importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption;

If anything, the decrease in nonresident fisherman has increased the residential sport fisherman's opportunity to obtain fish for consumption.

(4) the availability of alternative fisheries resources;

It can be easily documented that there is no need for an alternate fisheries resource at this time. The opposite is true in the current situation where there is more than enough of the resource available. Especially if managed correctly.

(5) the importance of each fishery to the economy of the state;

Currently all of the fisheries involving Chinook salmon can be demonstrated to be very important to the state economy overall. It would be a lengthy article to recite the economic mechanics of both the troll and charter fisheries. Sufficed to say both industries employ and support major parts of the Southeast economy. To allocate more fish to one at the expense of the other, would end in a deficit to the state's economy as a whole.

(6) the importance of each fishery to the economy of the region and local area in which the fishery is located;

In the Southeast region the commercial troll fishery and the charter fishery are both a valuable part of the economy. The troll fishery amid the covid 19 pandemic is performing as it always has. It has been economically stable. The charter fishery has not and has been deeply impacted. Given the recent sport harvest history where the problem clearly is not a lack of fish but covid, it is not logical nor rational to take fish from a functioning troll fishery, making it less economically viable, in attempt to revive the charter fishery from covid . In the current pandemic conditions, risking harm to a well-functioning economic participant of Southeast's current fragile economy, unwisely risks detrimental harm to the region's stability.

(7) the importance of each fishery in providing recreational opportunities for residents and nonresidents.

It can be shown that the opportunities for both would not significantly change if the allocation was changed. 2020 showed there was excessive opportunity for both and 2021 shows that had management been more appropriate for the situation, opportunity for the nonresidents would not have been impacted.

Sincerely, Steve Merritt



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Homer, Alaska, and I participate in the commercial, sport, and public use salmon fisheries in the Prince William Sound Region. Started commercial fishing with my dad in 1970, there was much instability in salmon runs in the 60s and 70s. My four children also grew up fishing PWS and fish their own boats currently. Hatcheries in PWS have created and sustained the stability and opportunity for our family to prosper for the last 40+ years.

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,

Steve Tutt
mweifish1@gmail.com
(906) 399-6007

Submitted By
steve vanek
Submitted On
11/8/2021 9:13:49 PM
Affiliation
self



PC222
1 of 1

Phone
9075673470
Email
smlvanek@gmail.com
Address
PO BOX 39103
Ninilchik, Alaska 99639

I have been here since the FRED Division was building hatcheries. I wasn't sure about hatcheries then because I didn't know how carefully they were regulated. The Fred Division was involved with hatcheries so as to produce more salmon and other species for the common good. Now that the Fred Division is gone the onus falls on PNPs. But the objective is still the same. It is the Departments job to see that they operate in the best interests of the State and of the wild fish. They do a good job. Let them do their job.

Submitted By
Steven James Swartzbart
Submitted On
11/4/2021 8:11:52 AM
Affiliation



PC223
1 of 2

Phone
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Address
P.O. Box 233
Cordova, Alaska 99574

2021 PWS BOF Public Comment

My name is Steven Swartzbart and I am second generation commercial fisherman from Cordova, Alaska. I am an Area E drift gillnet fisherman and passionate about protecting the value of the fishery. I appreciate the opportunity to comment on these proposals that will directly impact my livelihood.

Proposal 5- Oppose

Adding an Optimum Escapement Goal for the Copper River of 24,000-40,000 chinook would limit time and area for the commercial fleet and only benefit upriver users. In recent years the commercial fleet has taken most of the burden of conservation on years of low returns. Increasing the escapement goal above the present, scientifically established one would result in many unharvested king and sockeye (due to the similarities in run timing and area) salmon and would needlessly cost the commercial fleet millions. I support escapement goals that are set by ADF&G, not a sport fishing association from a different part of the state.

Proposal 7-Support

Subsistence opportunities to harvest salmon are being fished with commercial guide boats. This is a loophole and guide outfits are profiting from subsistence salmon. I hope to see the board support this proposal to limit the commercialization of subsistence fishing.

Proposal 19- Support

This proposal would simply help share the burden of conservation between Copper River user groups on years of low return and help give the management biologist the confidence to open the commercial fishery more.

Presently there is no way to count the number of fish entering the commercial area. So on years when run timing or escapement numbers are behind schedule, the commercial fleet is shut down. The fish then go up the river and past the Miles Lake sonar and the escapement goal is achieved without limiting upriver users. This means the commercial fleet sits on the beach and watches the run go up the river while the price of fish is at the season's highest. Not only is the fleet not making money, they are also not gathering useable data for the biologist. Building in an upriver safeguard would be a useful management tool and would hopefully prevent long, idle periods for the commercial fleet.

Proposal 31-Oppose

Increasing the bag limit to six sockeye creates a situation that can easily be abused. I believe it would be difficult for law enforcement to enforce the three-sockeye daily limit with so many users and so few law enforcement officers. I believe that this proposal should be discussed with the Alaska State Troopers and ADF&G before any action is taken.

Proposal 38-Support

Proposal 38 is an effort to help distribute the burden of conservation amongst both sport and commercial fisherman. It does not seek to limit Cordovans opportunities to catch coho salmon. The proposal does not affect subsistence fishing for coho and it only affects the number of fish you are allowed to take home sport fishing after two weeks of commercial closure.

I spend a lot of time in the fall sport fishing for coho on the Eyak River. In my experience, bait is more effective but is not used by that many people. It is also not used by many out-of-town tourists that help boost the local economy this time of year. This proposal does not take away local opportunities to catch eat cohos. It will also not negatively impact tourist ability to come enjoy the Copper River Delta.

Proposal 41- Support

ADF&G has used the inside king closures often and past their mandated date for king salmon protection. Repealing this mandate will not change how the fishery is managed by ADF&G, but will clean up an unnecessary regulation.

Proposal 45- Oppose

Proposal 47- Oppose



PC223
2 of 2

This proposal's main argument is that the gillnet fleet harvests too many pink salmon in the Coghill district prior to July 18, when seiners are allowed into the Coghill District. The writers of this proposal believe that "The intercepted enhanced fish are predominately pink salmon bound for the Valdez Hatchery". In 2021 the gillnet fleet harvested 218,388 pinks in the Coghill District prior to July 18, which was the last exclusively gillnet opener. The 2021 Annual Management Plan for Solomon Gulch Hatchery (Valdez Hatchery) says, "VFDA's 2021 anticipated pink salmon run to SGH is 20,593,644 million fish." This means the gillnet fleet harvested %1.06 of the of the Valdez Hatchery run in the Coghill District prior to July 18. This number also does not account for the pink salmon caught by the gillnet fleet at this time in the Coghill district that are bound for Wally Noerenberg Hatchery which is allocated to both seine and gillnet gear types. Taking this into account, the percentage of these fish caught by gillnetters is likely much lower than one percent.

Proposal 47 also has concerns about the wild stocks that are intercepted by the gillnet fleet in the Coghill District. It states that, "The wild fish intercepted are chum and pink salmon predominately bound for the Northwest District and the Northern District, both of which are exclusive Seine areas." This is true, which is why ADF&G closes the Bettles Bay Subdistrict to protect escapement for wild pink and chum salmon.

This proposal is attempting to address the issue of intercept fishing. I am sure the board hears many proposals all around the state trying to limit intercept fishing. The fact is, intercept fishing is always going to happen, especially in Prince William Sound between different gear types. The seine fleet has intercepted exclusively gillnet Main Bay sockeye in AFK for years and exclusively gillnet WNH chums in the Montague District though these species are way more valuable to the gillnet fleet. As long as each gear type's allocation works out as planned, trying to stop every intercepted fish is a race to the bottom. I encourage the board to look at allocation as a whole and not individual fish.

Proposal 48- Oppose

This proposal is similar to number 47 in that it seeks to limit intercept fishing. In this case by the gillnet fleet in the Eshamy district which is a very small compared to the rest of the sound. The Northwest and Alaska Seine Association claims that "The Gillnet group harvest large numbers of salmon in the Eshamy District, both wild and enhanced, bound for other areas." They claim that the gillnet fleet intercepts fish bound to almost two thirds of the sound; (1)Valdez Hatchery, (2)AFK Hatchery, (3)Port Chalmers Chums, (4)Ester Chums, (5)Northwest District, and the (6)Northern District. It is off the mark for the Northwest and Alaska Seine Association to claim that gillnetters are intercepting too many fish when gillnetters are already regulated to such a small area, compared to the seine fleet (the entire PWS). I encourage the board to look at allocation as a whole and not individual fish.

Proposal 58- Oppose



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 commercial 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,

Steven Nast
steven.nast@obiseafoods.com
(206) 305-8351

Submitted By
Stuart L Deal
Submitted On
11/15/2021 12:52:13 PM
Affiliation



PC225
1 of 1

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stuart.deal@gmail.com
Address
7314 11th Ave NW
Seattle, Washington 98117

I support the permit stacking proposals. They are gear reduction proposals, and we need that.

Prices of fish have not increased since the 1970s, while operating costs have increased considerably. Permit stacking can address this and a variety of problems for the commercial fleet without being a relatively permanent buy back. In Bristol Bay where permit stacking is allowed, recent increases in returns of salmon have accompanied a decrease in the number of boats operating two permits. This demonstrates how permit stacking can fluctuate with the changing conditions in the fishery. Enabling an owner of two permits to fish both on one boat is also a good idea.

A shortcoming of these proposals is that a 25 fathom increase in length for stacking a second permit may not offer enough incentive to effectively reduce the number of boats. Seine operators that I have spoken with, who agree that gear reduction is a good idea, doubt that a 25 fathom increase in length is motivating enough to stack a permit. I would prefer to see increased fishing opportunity for vessels operating with two permits. An increase in fishing time that is proportional to the number of operations withdrawn from the fishery would provide a better incentive for stacking.

For example:

10% of the fleet operates with stacked permits, then on about every 5th day of open fishing in a season, fishing is closed at midday to the fleet at-large, but the boats with stacked permits continue to fish the rest of the day. Harvest figures for aggregate benefit to the stacked permit operators determines the frequency of exclusive fishing periods. The increased harvest to operators stacking permits could be capped at 30% to manage the level of fleet reduction.

Stuart Deal

Seine vessel operator PWS

Submitted By
Sue Cox
Submitted On
11/15/2021 7:42:11 PM
Affiliation



PC226
1 of 1

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

My family relies on the ability to harvest salmon under a subsistence permit on the Copper River. This proposal would heavily reduce our fishing opportunities and limit the number of fish we count on throughout the year. This area feeds our family throughout the year on a single subsistence permit, with responsible harvesting annually. We take a small count compared to the counts taken by commercial fishing of the same fish population.

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 a reduction in counts allowed for all parties, rather than close off boat access. We are very fortunate to live in a state with subsistence opportunities, families depend on and I believe they should be protected for all those who depend on a subsistence way of life.

Thank you for your time,

Sue Cox

Submitted By
THEA THOMAS
Submitted On
11/14/2021 7:22:54 PM
Affiliation



PC227
1 of 1

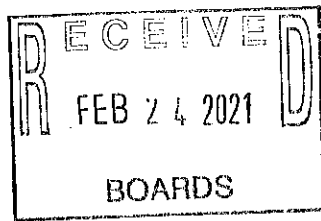
Phone
907 424 5266
Email
thea@ctcak.net
Address
PO Box 1566
112 S. 2nd St.
Cordova, Alaska 99574

Dear BOF members, thank you for your time and consideration of my comments. I am a resident of Cordova and a commercial salmon fisherman since 1987. I will focus my comments on the proposals concerning the **Upper Copper River Personal Use and Subsistence** and **Copper River King Salmon Management Plan**.

There are many issues on the Copper River, but the glaring area of concern is the decline in the Copper River sockeye salmon returns. The total return has gone from over 3 million fish to just over 1 million fish a year. The commercial fishery has shouldered the entire burden for the conservation of this resource. The commercial fishery has been closed for up to 3 weeks, with no reduction in the time, area and harvest of the upriver fisheries. In the past, the board has stated on numerous occasions that all fisheries must share in the burden of conservation. That is why I **strongly support Proposal 19**.

Concurrently as the returns have declined, the upriver fisheries have expanded. This is most evident in the use of boats and dip-nets in the Glennallen Subdistrict. Traditionally the subsistence fishery exclusively used fish-wheels. Not only has the fishery expanded to the use of boats, many of those boats are commercial operators with guides. I **strongly support the intent of all the Proposals 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17** that all in one way or another attempt to slow or control this expanding fishery.

I do not believe the sockeye returns on the Copper River will rebound soon, the upriver fisheries must share in the burden of conservation.



February 16, 2021



PC228
1 of 2

Thomas E. Caine
3504 NW 191st Circle
Ridgefield, WA 98642
Tel No.: 360-887-4269

Alaska Department of Fish & Game
Board of Fisheries (and any other interested party)
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Prince William Sound Fishery Proposals; Comments on

Dear Board Members,

This letter is being written in order to submit on-time comments on Sport and Commercial Fishing Proposals 38, 39, and 40 for the Prince William Sound / Cordova Area for the upcoming Board of Fisheries meeting later this year. I am a nonresident sport fisherman who, along with my wife, have enjoyed the beauty and public resources of the Cordova area for 12 years. The purpose of this letter is to express my opinions, and enter suggestions relative to the aforementioned Proposals, and to express appreciation for the opportunity to do so.

Proposal 38

I am in opposition to Proposal 38. Speaking for myself, and I suspect many others, losing the opportunity to catch-and-release coho, especially if/when the bag limit is reduced to a single fish, will ultimately result in the loss of many sport fishers to the area. Reservations for accommodations and travel must be made well in advance to fish the coho runs in the Cordova area. If, after making these reservations, the catch and release sport fishery were to be prohibited, I would likely cancel any prearranged trips to the area and thereby suffer the loss of accommodation deposits and encounter airlines change fees. Such cancellations would also impact revenue to the hospitality industry (accommodations, rental cars, rental boats, gas, groceries, restaurants, etc.) in Cordova.

Instead of prohibiting catch-and-release as suggested by Proposal 38, I believe the proper implementation of certain gear restrictions and fishing methods can minimize catch-and-release mortality to an acceptable level. Such restriction and methods include:

- Restriction of bait (as proposed)
- Use of barbless hooks
- Bring a hooked fish in quickly to prevent exhaustion
- Keep the fish in the water at all times to prevent scale loss and mucus coat abrasion
- Support a fish facing upstream into current until fully recovered
- Do not hold fish by the gill plates
- Minimize all handling of fish

Also, during existing commercial coho openers in the salt below the fresh water system in the Cordova area, virtually all salmon are prevented from entering the Eyak and related tributaries. This has a dramatic impact on sport fishing, especially with "extended" openers. So, when the coho run is good, sport fishing is greatly impacted by the commercial fishing; and now when the runs are low, Proposal 38 could eliminate sport fishing altogether.

Therefore, I respectfully request that the catch-and-release restriction recommended by F
for this public resource not be adopted.



Proposal 39

I am in opposition to Proposal 39. Due to natural changes in river courses, the statement issued by Cordova District Fishermen United in their Proposal 39 is no longer completely factual. Until the last few years, there was a good fishing area below the bridge on Ibeck Creek. But the Scott River, which had normally put heavy silt in the Ibeck on its east side just above the bridge only during high flow periods, now discharges silt into the Ibeck even during normal and low water conditions. This makes the water below the bridge all but unfishable. If Proposal 39 is accepted, the only feasible fishing area that would remain would be from the bridge to a quarter mile above the bridge. Such a limitation would result in undesirable and unacceptable congestion of fishers in a very condensed space. This would especially occur during periods right after high flows when the waters of the Ibeck are among the first to clear and most other waters remain silty.

For many people, fishing the Ibeck is much more than just "meat fishing". The opportunity to be immersed in a quality fishing experience is possible on the Ibeck by hiking away from the usual crowded surroundings near the bridge. Since this is no longer possible downstream from the Ibeck bridge, it can only be achieved on the three mile stretch above the bridge.

I therefore respectfully request that Proposal 39 be denied.

Proposal 40

I am in opposition to Proposal 40 as stated. Unlike the other waters in the Cordova area which run heavy with silt during high flows, the 18-Mile system remains clear. Shutting down the fishery in this System would virtually eliminate sport salmon fishing opportunities in the area during heavy flows for days or weeks until streamflows subside and clear in other waters.

As stated in Proposal 40, the issue that the Copper River/Prince William Sound Fish and Game Advisory Committee would like the Board to address is the "lack of spawning coho salmon" in the 18-Mile System. I respectfully request that before accepting the Fish and Game Advisory Committee's Proposal 40 to close the 18-Mile System to sport fishing, that the Board consider other ideas that could accomplish the same objective without such a significant impact to the sport fishery. May I suggest that an alternative proposal to achieve this end would be to adjust the commercial fishery in the salt water below Alaganik slough to increase adult escapement to these waters.

I therefore respectfully request that Proposal 40 be denied.

Thank you for the opportunity to provide comments to the fishery proposals for the Prince William Sound / Cordova Area.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas E. Caine".

Thomas E. Caine

Submitted By
Thomas James
Submitted On
11/14/2021 6:00:02 PM
Affiliation
PWS Setnet



PC229
1 of 1

Phone
907 3991826
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colleen.james@gmail.com
Address
40732 Waterman Rd
Homer, Alaska 99603

I oppose proposal 42. It is unfair, the system that we have been using has worked well for the 27 years that I have fished in this fishery. This proposal will add to the existing problems and will certainly cause a great deal of division if adopted.

Submitted By
Thomas Llanos
Submitted On
11/14/2021 4:18:03 PM
Affiliation



PC230
1 of 1

Phone
907-227-9120
Email
thomasllanos@hotmail.com
Address
7441 Nathan Drive
Anchorage, Alaska 99518

Dear Fisheries Board, My name is Thomas Llanos. I live in Anchorage Alaska and have in the past relied on subsistence fisheries out of the copper river. I have used the charters to be dropped off and picked up. I have just walked to sites. I have used a boat owned by my son to fish. Restrictions proposed would limit my ability to feed my family. Although last dipnetting season, due to covid-19 restricted me to participate i feel any proposal put forth by the board would be a terrible choice for the freedoms of this state. I hope the federal oversight would weight in in regards to the proposed limits in regards to the access to food to feed not only alaskan natives but thier families as well. As you know there are alaskan native families with non-alaskan natives who need the salmon as well. If you could Look towards a conservative balance between all industries. If the fisheries state biologist needs sample for copper river. Many alaskans would step up to provide that insight to understanding our copper river fisheries. Respectfully, Thomas Llanos



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 am a 3rd generation commercial fisherman. My Uncle was one of the founders of the VFDA Valdez Hatchery and my Grandfather helped start the hatchery system PWSAC in the rest of PWS. Fishing is everything to our livelihood and community. As arguably one of the most sustainable hatchery programs in the world, it would be remiss to penalize or reduce the production of such a successful program. And extremely detrimental to the people who rely on it.

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.

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

Sincerely,

Thomas Lopez
Fv.conspiracy@gmail.com
(910) 547-8280



From: [Thomas Lopez](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: BOF COMMENT PROP 56/57
Date: Thursday, October 15, 2020 9:43:02 AM

Meeting: Working Meeting on 10/15/20

Name: Thomas M Lopez II

Fishery: Seine permit and fishery participant for 11 seasons, 3rd generation seiner.

Email: fv.conspiracy@gmail.com

Re: Proposal 56

Gear stacking is a good solution for addressing the excess fishing capacity within the Prince William Sound (PWS), however for the purpose I do not believe this proposals would have the correct results.

Adding 25 fathoms of gear for a stacked permit is a good medium proposal that most of the fishery would support. I do not however support the depth increase aspect.

This would be too much of an advantage over a single permit holder. It would end by making us more efficient catchers and therefore making the management issues even worse.

Re: Proposal 57

Prop 57 I believe is the correct middle. The 25 fathoms of extra gear is not too much of an advantage to create more management issues. 25 fathoms of extra length is a good moderate proposal that addresses the issues of excess fishing capacity in the PWS. While also not being too much of an advantage to make it necessary to compete. I do not see any downside to the proposal as it carries benefit for all of the permit holders without making operations "above others".

Thank you,

Thomas M Lopez II

.....

Submitted By
Thomas Nelson
Submitted On
11/5/2021 2:05:41 PM
Affiliation



PC232
1 of 1

Member of the Board of Fisheries,

I have been a lifelong Alaska resident and participant in Area E fisheries, as well as a permit holder for 30 years. I would like to comment on several proposals for this upcoming meeting and will try to group them by topic.

Proposals 49-55 relating to hatchery production, management and operations. I OPPOSE any action on these proposals. The Board of fish does not have authority over hatchery operations and should not consider any of these proposals. Any consideration to hatchery management plans would fall under ADFG's authority. Furthermore the justification for action in these proposals makes claims that there is no evidence to support. Just because hatchery pink salmon stray does not mean they are harming wildstocks. All salmon stray, and pink salmon will stray at a much higher rate because they are a short lifecycle species. They do not have multiple year classes to fill in catastrophic events in streams. They accomplish this by straying, at a relatively high rate in some years, to continue the success of the species. The statement in the Proposal "until straying ceases" is ridiculous and completely counter to the laws of nature. If hatcheries are supposedly harming wild stocks, why are PWS pink salmon wildstocks at all time record levels? The perception that hatchery fish are different from wildstocks is just that a perception. Donor stock came from local streams and without reading an otolith mark you would not be able to tell a hatchery produced fish from a wild fish. There is also some speculation regarding food competition but again this is just a perception. The reality is hatchery salmon are a minority compared to wild salmon and salmon are a small minority compared to all the other juvenile fish in the ocean. There are billions of outmigrating salmon, but in the Gulf alone there are quadrillions of pollock each spring and that's just one species. Juvenile salmon will face far more competition from other extremely prolific species, and there are many, than other salmon. That's the trouble with all these designer studies looking at relationships between salmon species and food abundance, it makes the assumption that salmon are the only fish in the ocean. These proposals are based in activism, speculation and theory not on any actual scientific evidence. Using very narrow scoped, specifically designed studies to produce particular outcomes to be passed on as fact.

In regard to allocation, specifically proposal 43, I would be OPPOSED to changes in the allocation policy. It's a very complicated scenario with fisheries and market conditions varying from year to year and I feel the current policy does a good job trying to maintain parity. It has worked pretty well over the last 15 years and I see no reason to change something that's working.

Proposal 60 dealing with coordinates for closed waters I SUPPORT this proposal with the exception of F, Beartrap Bay, this bay already has coordinates in regulation and I see no need to change the closed area considering there is a white sign marker currently in place at the coordinates in the current book.

Proposal's 56-57 concerning permit stacking. I would SUPPORT this approach to reducing the size of the fleet in PWS. Another version of a buyback, the current number of permits is too high.

Thank You Thomas Nelson Homer, AK

Submitted By
Thomas Upah
Submitted On
9/5/2021 5:02:50 PM
Affiliation



PC233
1 of 1

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Anchorage, Alaska 99507

There comes a time when the health of the ecosystems become more urgent then financial gain. Commerical fishing of all salmon is continually decreasing salmon numbers. It is true that banning all salmon fishing for at least one season maybe longer would devastate an industry and cause difficulties. If Commerical fishing of salmon is allowed to continue the salmon may not be able to recover. Certainly any people losing income or jobs will most likely recover. In my mind the choice is simple but unpopular. Thanks for listening



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Girdwood and commercial, subsistence, and sport fish. Additionally, I am a processor and have twenty family members directly involved in the fisheries industry. I am also involved through extensive community involvement.

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,

Tim Cabana
timcabana@yahoo.com
(907) 783-3297

Submitted By
Tobias gunzinger
Submitted On
11/15/2021 7:41:06 PM
Affiliation



PC235
1 of 1

I would like to object to proposal 9 , eliminating the use of boats in the Glennallen sub district.

For the past 2 years my family has made a trip to Chitna to Dip net on the copper river. We rely on the ability to responsibly catch salmon under a subsistence permit. If this proposal would pass it would greatly decrease the number of fish we count on through the year.

After reading into the proposal I find that the annual harvest from subsistence is significantly lower than both commercial and personal use fishing. In my opinion I would think it would be much more beneficial if the limit was reduced for commercial, and recreational instead of limiting personal use boats on the river. We have only lived in Alaska a few years and for sure one of the best benefits to living here is the ability to have subsistence opportunities and I hope they will remain for many more years into the future.

I appreciate your time and consideration into this matter.

Tobias Gunzinger

Submitted By
Todd Lemay
Submitted On
11/7/2021 9:26:58 AM
Affiliation
Resident

Phone
9074884398
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lemaytodd@gmail.com
Address
pob 58722
Fairbank, Alaska 99711



PC236
1 of 1

Poposal 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 18- Strongly Oppose

Proposal 19-Strongly Oppose

Proposal 20-Strongly Oppose

Proposal 21-Support

Proposal 22-Support

Submitted By
Tom Zarrilli
Submitted On
11/9/2021 6:56:23 AM
Affiliation



PC237
1 of 1

Proposition 6- Oppose. In addition to Miles Lake sonar there are survey fish wheels located at Baird Canyon and Canyon Creek where fish are caught, counted, studied and tagged. From the catches of marked and unmarked fish at these sites the number of fish making way upstream can be calculated. Both Chinook and Sockeye salmon are sometimes fitted with radio telemetry units so that their progress and catch rate can be calculated. These resources provide a lot of data. Does the fisheries biologist need any more data or would this just be an unnecessary burden on fisher persons? Also of note would be the fact that internet or phone reporting would not be possible by people using AT&T cell service. AT&T has 44.8 percent of the market(according to statistica website) and 0 coverage in the Chitina area. Proposition 7-People use guide and transport services because it is more economical than boat ownership. Proposition 8- Oppose. Proposition 9- Oppose. Proposition 10- This requires clarification before anyone could comment. Oppose. Proposition 11- Oppose Proposition 12- Oppose. Since there are limited areas to safely and productively drift a solution may be to designate areas to drift exclusively. Proposition 13- fishing to close for comfort is discriminatory. A boat operator certainly has it in his best interest not to have contact a fish wheel. Oppose. Proposition 14- Monofilament nets used do not "gill" chinooks. In my experience unkeepable Chinooks can be rolled out of mono nets quickly and effectively especially if not pulled aboard the boat but kept over the side. If teeth do get tangled they quickly rip through the netting. Oppose Proposition 15- See above. Oppose Proposition 16- Not using available navigation aids is Ludacris. As a USCG master Captain and mariner who started out using paper charts I am impressed with the technology of the new gps/fathometer units. They make boating easier and safer for everyone. That said, as someone who has spent a lot of time dipnetting on the Copper I have never found the sonar/fish finder to be of any use targeting salmon. Oppose Proposition 17- Oppose Proposition 18- Support. During higher flows and crowded fishing times this would be advantageous. Proposition 19- Oppose. Why not let residents utilize the resource rather than a commercial venture exploiting it to sell overseas. Proposition 20- Understanding that this is a food source for many and counted upon, I see so much overtaking of what some people can process or use. Support. Proposition 21- Support.

Submitted By
Tony Murray
Submitted On
11/14/2021 4:13:13 PM
Affiliation



PC238
1 of 1

Phone
2183930252
Email
tony@lsxray.com
Address
4729 Portland Rd.
Duluth, Minnesota 55811

Stronly Oppose #5

As a yearly vistor to the Copper center area I've seen seen the negative affects when sport fishing is closed for king salmon. I understand that there are times that warrant that decison. When the season is "open" for sportfishing alaska fish and games regulations are STRICKLY inforced by all guiding services. During past "open" seasons there is no shortage of king salmon. There are a ton of fishi in the river. By changing this rule to increase the number of salmon needed to be counted to allow sport fishing to continue will only hurt the businesses and citizens of this area while not making an impact to the salmon fisher. With only 1 king being taken by sport fisherman per year it doesn't seem justifiable to think of sport fishing as a "risk" to king salmon population in the area. Please keep the current escapment goal of 21,000-31,000 fish



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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.

We have processing plants in Cordova and Seward, and my participation in the salmon fisheries of the Prince William Sound region is through processing. I work for OBI Seafoods. Prince William Sound fisheries are very important to the success of OBI and the communities we support. We are a major supporter of Prince William Sound communities including Cordova, Seward and Homer.

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,

Tony Ross
tony.ross@obiseafoods.com
(206) 286-2569

Submitted By
Tracey Nuzzi
Submitted On
11/14/2021 11:10:59 AM
Affiliation



PC240
1 of 3

Dear BOF,

I am a commercial and subsistence fish and game user in Cordova, AK. My family supports itself through both. Thank you for consideration of my opinion on the following proposals:

Proposal 5 Oppose
Proposal 6 Support
Proposal 7 Support
Proposal 9 Support
Proposal 10 Support
Proposal 18 Oppose
Proposal 19 Support
Proposal 20 Support
Proposal 21 Oppose
Proposal 22 Oppose
Proposal 41 Support
Proposal 44 Support
Proposal 45 Oppose
Proposal 46 Support
Proposal 47 Oppose
Proposal 48 Oppose
Proposal 49 Oppose
Proposal 50 Oppose
Proposal 51 Oppose
Proposal 52 Oppose
Proposal 53 Oppose
Proposal 54 Oppose
Proposal 55 Oppose
Proposal 58 Oppose

Comments on each proposal:

Proposal 5 – I oppose this proposal after reading the department's comments. In the department's comments, they say "they department recommends an SEG range of 21,000 – 31,000 king salmon in 2020 that better defines the range that would maximize long-term returns". I think maximizing the long-term returns is the goal and trust the department in enumerating escapement numbers.



Proposal 6 – I support this proposal; as the use of technology and the updates the State has made to its reporting help determine in-season run strength and run specific escapement issues on the Copper River. For example, PWS sockeye hatchery has not made its brood stock goal in 5 years, which will start to impact all fisheries this next year. PWSAC and managers need as many tools as possible to maintain abundance. This is a great start.

Proposal 7 – I support this proposal; as I do support the no fee policy when it comes to subsistence harvest and not commercializing our Alaskan subsistence fisheries.

Proposal 9 – 10 – I support these proposals, as I do see the trend of commercializing our subsistence and PU fisheries through contracting boats as guides. As boat access trends increase, it only increases the pressure of an already fully allocated fishery.

Proposal 18 – I oppose this proposal. After reading the department's comments that to approve this proposal, it would make enforcement more difficult, nor likely to alleviate boat congestion. The PU fishery is already fully allocated and not requiring more area.

Proposal 19 – I support this proposal; as the burden of conservation is meant to be felt by all users. The last few years are a prime examples that when sockeye runs are low, the commercial users take the major share of the burden.

Proposal 20 – I support this proposal in the author's attempt to maintain similarity between the other PU fisheries in the State and help spread the fish out amongst more PU fishers.

Proposal 21 – I oppose this proposal; as my vague memory was about early season sockeye runs getting upriver before the start of the fishery, along with king salmon passage.

Proposal 22 – I oppose this proposal for the same reasons the BOF determined C&T Findings previously.

Proposal 41 – I support this repeal; as it follows a repeal the BOF made last cycle regarding closure of upriver fisheries after the commercial fleet was closed for 10 days. The argument used for that repeal is similar to the one used for this proposal. Managers have the authority to shut down the inside fishery but not necessary to be in regulation before we even determine run strength.

Proposal 44 – I support this proposal; as it seems most likely its intended purpose. If the gillnet or seine fleet go above their allocation, and hit their "trigger", they lose a fishery. It has an impact to adjust the allocation balance. The setnet fleet trigger has been interpreted as just fishing the first parts of each bi-weekly opener, limit of 36 hours. The Main Bay red fishery is a build-up fishery so this interpretation doesn't necessarily accomplish the goal of rebalancing.

Proposal 45 – I oppose this proposal; as it reallocates the Main Bay red run to the setnet fleet. The Main Bay fishery is a build-up fishery with most of the harvest being caught within the first 6 hours. By eliminating shoreline access to the gillnet fleet, you will reallocate much of that run to the setnet fleet and get further from allocation numbers.

Proposal 46 – I support this proposal; as the author is accurate that it will greatly assist in chum harvest, especially in years with warm surface water. The gear length limit could remain a tool that the department could use if the Coghill red returns are in concern; but if not, the fleet and managers would benefit from deeper gear to determine chum run strength sooner.

Proposal 47 – I oppose this proposal; as it only focuses on one district and one gear group. The quantity of VFDA pink salmon harvest in the Coghill district by gillnets is quite minimal to impact of the total run.



Proposal 48 – I oppose this proposal; as it only

focuses on one district and one gear group. Both the seine and gillnet fleets harvest species destined for other districts, some years more than others, with management attempting to minimize as best with providing most time and area.

Proposals 49 – 53 – I strongly oppose these proposals. They would greatly reduce and limit hatchery production, disrupt further economic stability in Prince William Sound and its communities and have a large impact to sport and subsistence users too.

Proposals 54 – 55 – I strongly oppose these proposals. Production changes occur slowly, over many years of planning, and the annual BOF hatchery meeting in March is a more appropriate place to review and form Alaska's vision of hatchery production and its place in the global world of aquaculture.

Proposal 58 – I oppose this proposal; simply because of the magnitude of potential red harvest of the seine fleet with extended area and no other fishing opportunities at the time. I sympathize with the seine fleet with these restrictions but the nature of both chum remote release programs is simply a small return, not designed to provide for the activity and effort that shows up. Both AFK chum fishery and Port Chalmers chum fishery gets heavily restricted, even if the gillnet fleet has the Port Chalmers fishery, because of its location and the way the fish enter the Sound. The red run return is a small run compared to the large pink runs, and the seine fleet are so efficient that three days in front of that entry, can take a large chunk of the run.

Thank you for your consideration,

Tracey Nuzzi

11/14/2021



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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.

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,

Traci Lacktorin
Traci.lacktorin@obiseafoods.com
(206) 586-6514



November 15, 2021

Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811

Via <http://www.adfg.alaska.gov/index.cfm?adfg=process.comments> and
dfg.bof.comments@alaska.gov

RE: Prince William Sound and Upper Copper and Susitna River Sport; Proposals 32 and 33.

Dear Board of Fisheries,

On behalf of Trout Unlimited (TU) and its more than 20,000 Alaska supporters, I am writing to encourage the Board of Fisheries to reject proposals 32 and 33 to the Prince William Sound and Upper Copper and Susitna Rivers sport fishing regulations, 5 AAC 52.023. Current regulations require all rainbow trout and steelhead caught in the Gulkana River to be released while allowing anglers to retain arctic grayling and various species of salmon, subject to reasonable restrictions on time, place and manner of catch. The current regulations have proven effective in maintaining the health of the Gulkana River rainbow trout population while providing quality and sustainable sportfishing opportunity to Alaska anglers.

The Gulkana River is a popular sportfishing destination and, for anglers from the interior, is one of the most accessible and highest quality fisheries for wild rainbow trout. According to the Alaska Department of Fish and Game (ADFG) report, *Seasonal Distribution and Migration of Rainbow Trout in the Gulkana River, 2010-2012*,¹ the Gulkana River hosts approximately half of all annual angler days in the Upper Copper River and Upper Susitna River area. A major draw to the Gulkana River for many anglers is its abundant wild rainbow trout.

While anglers can sustainably retain and eat grayling and salmon under existing regulations, wild rainbow trout populations are vulnerable to overharvest even when harvest occurs at relatively low levels. In its *Fishery Management Report for the Recreational Fisheries of the Upper Copper/Upper Susitna River Management Area, 2016*, the ADFG urges conservative regulations and cautions that “the area’s widely distributed stocks of wild rainbow and steelhead trout display generally low production with little ability to sustain harvest.”² Proposals 32 and 33 depart from the current cautious approach without offering any scientific or background data in support.

To the extent proposals 32 or 33 are aimed at bolstering existing salmon hatchery programs, there’s simply no evidence to suggest rainbow trout are causing the perceived problem or that the proposals, if enacted, would alleviate the perceived problem.

¹ <https://www.adfg.alaska.gov/fedaaidpdfs/FDS15-01.pdf>.

² <https://www.adfg.alaska.gov/FedAidPDFs/FMR17-45.pdf>.



An abundant and healthy rainbow trout population is a major draw for anglers to the Gulkana River, which has additional benefits that ripple through the local economy. For those fishing the Gulkana River for sport, there may be no better quarry than rainbow trout. For those fishing the Gulkana River for food, fresh salmon or grayling over the campfire offer more attractive and sustainable alternatives. For these reasons, TU opposes proposals 32 and 33, and encourages of the Board of Fisheries to keep the existing rainbow trout regulations in place on the Gulkana River.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin Williams", written over a horizontal line.

Austin Williams

Alaska Director of Law and Policy

Austin.williams@tu.org



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 on Prince of Wales Island, and I participate in the subsistence and sport salmon fisheries of the Prince William Sound region. I am the assistant manager at the Klawock River Hatchery in Klawock Alaska. I have friends and family that rely on Hatchery fish from PWSAC and CIAA for subsistence uses.

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,

Troy Liske
tliske@ssraa.org
(907) 755-2231

Submitted By
Tyee Lohse
Submitted On
11/15/2021 10:16:23 PM
Affiliation



PC244
1 of 3

Proposal # 6

I support this proposal and believe the BOF should adopt it. I think it is important as a unseasoned management tool, I believe with the current situation of the Copper River salmon stocks we need to use all the tools that are available.

Submitted By
Tyee Lohse
Submitted On
11/15/2021 10:23:59 PM
Affiliation



PC244
2 of 3

Proposal #10

I support this proposal and believe the Bof should pass it. I don't like to see the commercialization of the subsistence fishery that is taking place by allowing boats and boat charters for dipping salmon.

Submitted By
Tyee Lohse
Submitted On
11/15/2021 10:29:42 PM
Affiliation



PC244
3 of 3

Proposal #16

I support this proposal and believe the Bof should pass it. As has been stated it is much harder and far more damaging to release a King salmon from a gillnet style dipnet. The mortality rates are unacceptable.



United States Department of the Interior

NATIONAL PARK SERVICE

Wrangell-St. Elias National Park & Preserve
Mile 106.8 Richardson Hwy. P.O. Box 439
Copper Center, AK 99573-0439
907 822 5234 Fax 907 822 3281
<http://www.nps.gov/wrst>



IN REPLY REFER TO:

1.A.2

NOV 15 2021

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

Dear Members of the Board:

I am writing to comment on a recommendation submitted to the Alaska Board of Fisheries (board) by the Alaska Department of Fish and Game (ADF&G, or department) and on regulatory proposals for the Prince William Sound (PWS) Management Area that are to be considered by the board during its Nov-Dec 2021 meeting in Cordova. I am commenting on these because of their implications for salmon populations (stocks) that spawn in Copper River tributaries that drain portions of Wrangell-St. Elias National Park and Preserve (WRST). Consistent with the National Park Service (NPS) mission and associated management policies, the objective of my comments is to ensure the conservation of these stocks as significant natural resources that represent a vital source of energy and marine-derived nutrients to park ecosystems and are central to the traditions and subsistence practices of many rural residents who are affiliated with the park.

ADF&G recommendation that the board change the Copper River king salmon sustainable escapement goal (SEG) from 24,000 fish to 21,000-31,000 fish

I oppose this recommendation for the following reasons.

The department's review and recommendations for PWS escapement goals were outlined in an escapement goal memo dated 3/16/2020 and in a subsequent report (Joy et al. 2021b; see Attachment 1 – References Cited) published in January 2021. In these documents, the department recommended that the SEG for Copper River king salmon be changed from a lower bound SEG of 24,000 fish to an SEG range of 21,000-31,000 fish, thereby effectively reducing the lower bound SEG from 24,000 to 21,000 fish. The analyses that were performed in support of the escapement goal review and recommendation were described in a separate peer-reviewed report (Joy et al. 2021a) authored by members of the department's escapement goal review committee (committee).

The department's recommendation to change the escapement goal was based on results of models that used various data sets for Copper River king salmon for the period 1980-2018 (Joy et al. 2021a). The

committee performed two separate analyses, one based on a model that included data for the full 1980-2018 period and one based on a model that included only a subset of data for the more recent 1999-2018 period. In developing the escapement goal recommendation, a key metric of interest was the number of spawners that provide maximum sustained yield (SMSY). The full 1980-2018 model, including data for years prior to 1999, estimated SMSY to be 22,844 (lower than the current lower bound SEG of 24,000 fish), whereas the 1999-2018 model estimated SMSY to be 26,951 (higher than the current lower bound SEG). The committee considered results of both models in developing its escapement goal recommendation, but the recommendation to reduce the lower bound SEG from 24,000 fish to 21,000 fish is likely to have been strongly influenced by results of the full 1980-2018 model that estimated SMSY to be lower than the current lower bound SEG of 24,000 fish.

The choice to consider the full 1980-2018 model in addition to the 1999-2018 model was made despite the committee's observation that the 1999-2018 analysis was based on higher quality data relative to years preceding 1999, and that the 1999-2018 period coincided with an apparent decline in productivity that may be attributable to a declining trend in body size. This declining trend in size has been documented in several recent research publications that are based in part on data collected by the department (e.g., Lewis et al. 2015, Ohlberger et al. 2018, Oke et al. 2020). Relative to years prior to 1999, the 1999-2018 period also encompasses well-documented occurrences of marine heat-wave conditions that have increased in frequency, magnitude, and duration during the past two decades (Fig. 1). Such conditions are expected to intensify as climate warming increases in the decades ahead (Di Lorenzo and Mantua 2016, Joh and Di Lorenzo 2017), with uncertain implications for salmon populations that spawn in Copper River tributaries.

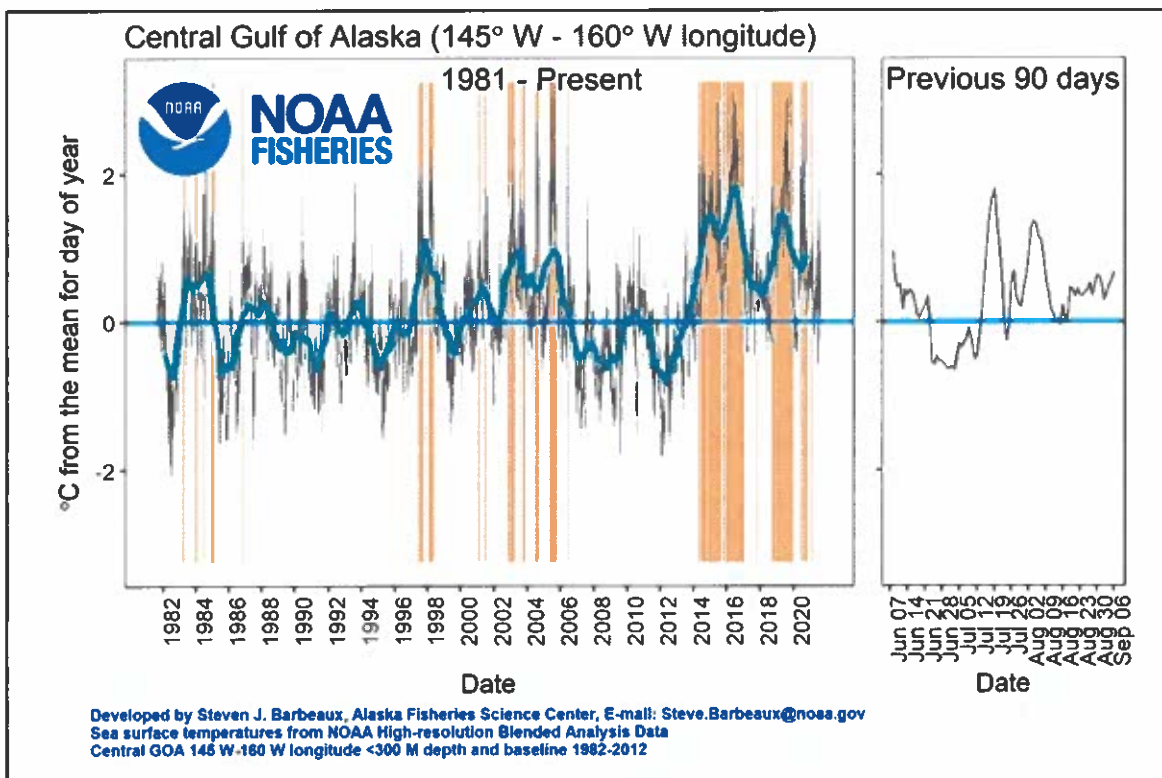


Figure 1. Sea surface temperature anomaly and marine heatwave conditions in the central Gulf of Alaska as of 9/6/2021. The graph shows satellite-derived sea surface temperature anomaly data for the central Gulf of Alaska. Here the central Gulf of Alaska is defined as the area between 145°W and 160°W longitude in waters less than 300 meters depth. The figure on the left shows the daily sea surface temperature anomaly (dark line), the 360-day rolling average (blue line), and time periods classified as having marine heatwave



conditions (orange shading) for January 1, 1981 through the present. The figure on the right shows the same for the previous 90 days only (*Credit: NOAA Fisheries, <https://www.fisheries.noaa.gov/feature-story/central-gulf-alaska-marine-heatwave-watch>, accessed 11/13/2021.*)

In considering the department's recommendation to lower the SEG for Copper River king salmon, I ask that the board consider the following facts.

1. Data collected by the department and analyzed in several recent publications indicate a declining trend in the size of Copper River king salmon, consistent with documented trends in other king salmon populations and other salmon species returning to spawn in Alaska.
2. Declining trends in salmon body size may be attributable in part to the increasing occurrence and severity of marine heatwaves that are projected to intensify in the future.
3. Declines in size are expected to result in declines in productivity, and analyses performed by the department's escapement goal review committee indicate a decline in productivity of Copper River king salmon beginning in the early 2000s.
4. The department's recommendation to lower the SEG was based in part on the full 1980-2018 model that used lower quality data from years prior to the recent decline in productivity and changes in marine conditions, may have overestimated the productivity of a king salmon population that is known to be declining in size, and therefore may have underestimated the degree to which the risk of overfishing would increase by reducing the lower bound SEG.
5. Reducing the lower bound SEG may pose greatest risks to small stocks, with potential adverse implications for overall population diversity of the Copper River king salmon population, encompassing genetic diversity as well as diversity of key life history traits (e.g., run timing) that may differ among individual spawning stocks. Recent research has found that population diversity within the Bristol Bay sockeye salmon stock complex reduces the interannual variability in overall run strength and harvest amounts due to the "portfolio effect" induced by multiple individual stocks characterized by different life history traits (Schindler et al. 2010).
6. Escapement of Copper River king salmon in 2020 was the 6th lowest since 2001 and did not meet the escapement goal. It appears that the goal may not have been met again in 2021. If this is the case, it will have been the 4th time in the past 10 years, with the lowest run since 2001 having occurred in 2016 when spawning escapement was estimated to be 12,485 salmon.

I oppose the department's recommendation to reduce the lower bound SEG for Copper River king salmon. To do so would be inconsistent with principles of precautionary conservation management, given the facts listed above, and may increase the risk of overfishing to a greater degree than is estimated by the full 1980-2018 model, especially for small stocks that are important for overall population diversity.

My opposition to the department's recommendation is consistent with concerns expressed by local stakeholders. In a 5/13/2021 letter to the department referencing PWS Proposal 5 (Establish an optimal escapement goal for Copper River king salmon), the Southcentral Alaska Subsistence Regional Advisory Council expressed support for maintaining the current lower bound SEG of 24,000 fish for Copper River king salmon due to the frequent occurrence of low escapement during the last 10 years. Likewise, in a 10/19/2021 letter to the board, the Wrangell-St. Elias National Park Subsistence Resource Commission expressed opposition to the department's recommendation to reduce the lower bound SEG for Copper River king salmon for the same reason.

Proposal 5: Establish an optimal escapement goal for Copper River king salmon

I support this proposal, with modification to maintain the current lower bound SEG of 24,000 fish rather than changing to an SEG range of 24,000 – 40,000 fish as proposed. For justification, see my previous comments on the department's recommended change in the Copper River king salmon SEG.



I support this proposal with further modification that the board address the long-standing lack of consistency between the king salmon escapement goals in the Copper River District Salmon Management Plan (CR District Plan, 5 AAC 24.360) and the Copper River King Salmon Management Plan (CR King Salmon Plan, 5 AAC 24.361). This inconsistency results in stakeholder uncertainty and concern about how the department is managing the commercial and subsistence fisheries in the Copper River District in coordination with Upper Copper River District fisheries to ensure conservation of Copper River salmon. The CR District Plan specifically directs the department to manage the Copper River District commercial salmon fishery to achieve an inriver goal of salmon, as measured at the sonar counter near Miles Lake. The spawning escapement component of the goal consists of the lower end of the sockeye salmon sustainable escapement goal (360,000 salmon) and **17,500 other salmon**, which would include king salmon and a relatively small number of coho salmon returning before sonar operations cease in late July. The CR King Salmon Plan specifically directs the department to manage the Copper River commercial and all other fisheries to achieve a sustainable escapement goal of **24,000 or more king salmon**. The different king salmon escapement goals in these two plans appear to reflect an error in regulation.

To correct this apparent error, the spawning escapement goal of 17,500 other salmon in the CR District Plan should be revised to match *or exceed* (to account for early returning coho in addition to king salmon) the 24,000-king salmon goal of the related CR King Salmon Plan. I ask that the board generate a regulatory proposal to revise the relevant section of the CR District Plan, 5 AAC 24.360 (b) to read as follows, with revised text **underlined in bold**, and regulatory text to be deleted fully capitalized and enclosed in brackets:

(b) The department shall manage the Copper River District commercial salmon fishery to achieve an inriver goal of salmon, as measured at the sonar counter near Miles Lake, based on the total of the following categories:

Spawning escapement

- lower end of sockeye salmon sustainable escapement goal
- **24,000 king salmon** [17,500 OTHER SALMON]
- **500 other salmon** (or the department's best estimate for the number of coho included in sonar counts)

This apparent regulatory error has implications that warrant its resolution through a board-generated proposal during this cycle. From correspondence with department staff, I understand that the CR King Salmon Plan is the primary guidance for king salmon management, and that the department does not consider the king salmon escapement goals in the two plans to be contradictory. But the apparent inconsistency strongly suggests to stakeholders that the total inriver goal of salmon, announced annually, is at least 6,500 too low. The continued apparent inconsistency between the two plans will result in ongoing uncertainty and concern among stakeholders regarding the department's management of Copper River sockeye and king salmon.

Resolving the apparent regulatory inconsistency will clarify for all stakeholders the department's management intent relative to king salmon escapement. This transparency in management intent also may help to address long-standing concerns expressed by local subsistence users in communities nearest the headwaters of the Copper River. Past research (Merritt and Roberson 1986, Wade et al. 2009) and Alaska Native traditional knowledge indicate that sockeye salmon stocks associated with headwater tributaries are among the earliest stocks to enter the river, with run timing similar to king salmon. Since at least 2004 (e.g., board proposal 53 in 2005) and as recently as 2021, subsistence users in headwater communities have repeatedly urged fisheries managers to allow more early run salmon to escape upstream of the



Gulkana River to increase subsistence harvest opportunities. Conservation measures that aim to ensure adequate king salmon escapement have the potential to benefit early migrating sockeye salmon stocks and local subsistence users who depend on these headwater stocks for meeting their subsistence needs.

Proposal 21: Amend the opening date of the Chitina Subdistrict personal use fishery from June 7 to June 1

I oppose this proposal for the following reasons.

Adoption of this proposal would allow fishing that would impact early migrating stocks of sockeye and king salmon, with the potential to disproportionately and adversely affect weak stocks that are important for the overall population diversity and portfolio composition of Copper River sockeye and king salmon populations. Previous studies of migratory timing of Copper River sockeye (Merritt and Roberson 1986, Wade et al. 2009) and king salmon (Gilk-Baumer et al. 2017) confirm that upper Copper River stocks typically arrive earlier than most other stocks, meaning that these stocks would be at greatest risk if the opening date of the personal use fishery was changed from June 7 to June 1. As indicated previously in my comments regarding king salmon escapement goals, since at least 2004 (e.g., board proposal 53 in 2005), subsistence users in headwater communities have repeatedly urged fisheries managers to allow more early run salmon to escape upstream of the Gulkana River to increase subsistence harvest opportunities. These urgings were expressed again in 2021, both to me and to ADF&G fisheries managers, due to increasing concerns about not having adequate harvest opportunities to ensure that subsistence needs are being met. These concerns are associated with subsistence users' perceptions that excessive harvest of sockeye and king salmon stocks destined for headwater spawning grounds occurs during early season openings of the Copper River District commercial fishery and the Upper Copper River Chitina Subdistrict personal use fishery. The delayed start of personal use fishing times in the Chitina Subdistrict is an effective means of allowing some of the earliest salmon stocks to distribute to the upper reaches without being harvested downstream, and I ask that the opening date not be changed to allow earlier fishing.

In relation to this proposal and concerns expressed by upriver subsistence users, it is important to note that WRST and ADF&G were successful in obtaining NPS funding for a 3-year research project that will use in-season genetic analyses to determine the stock composition of sockeye salmon harvested in the commercial fishery and upriver personal use and subsistence fisheries. The project "Apply Genetic Analysis of Copper River Sockeye Salmon Stocks to Inform In-Season Decision Making" will be implemented by ADF&G (Gene Conservation Laboratory, Division of Commercial Fisheries, and Division of Sport Fish) in 2022-2024. In addition to providing data for consideration by fisheries managers in-season during years 2022-2024, we anticipate that preliminary results of the 3-year study will be available for consideration by the board during the next cycle for the PWS Management Area in 2024.

Proposal 41: Repeal mandatory closed waters from the Copper River King Salmon Management Plan

I oppose this proposal for the following reasons.

The mandatory closed waters during the early season commercial fishery serve as a conservation measure to assist in managing to achieve the escapement goal for Copper River king salmon. The stocks being harvested in the area closer to the mouth of the Copper River are very likely to consist of a high composition of Copper River bound stocks. This proposal would eliminate the existing regulatory provision that assists in managing to ensure the sustainability of these stocks.



As indicated previously in my comments regarding king salmon escapement goals, escapement of Copper River king salmon in 2020 was the 6th lowest since 2001 and did not meet the escapement goal. It appears that the goal may not have been met again in 2021. If this is the case, it will have been the 4th time in the past 10 years, with the lowest run since 2001 having occurred in 2016 when spawning escapement was estimated to be 12,485 salmon. Given this context, increasing public expression of concerns for Copper River king salmon, and the fact that many of these stocks are bound for spawning locations in WRST, I do not believe it to be prudent to repeal the mandatory closed waters.

Thank you for your consideration of these comments and your support for the long-term conservation of salmon in the Copper River.

Sincerely,

A handwritten signature in blue ink, reading "Ben Bobowski".

Ben Bobowski, Ph.D.
Superintendent

Attachment

cc: Jeff Mow, Acting Regional Director, NPS Region 11 (Alaska)
Grant Hilderbrand, Acting Associate Regional Director for Resources, NPS Region 11 (Alaska)
Sue Detwiler, Assistant Regional Director – Subsistence, U.S. Fish and Wildlife Service – Alaska Region



Attachment 1 – References Cited

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UNITED FISHERMEN OF ALASKA

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E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

November 10, 2021

Doug Vincent-Lang, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Re: Prince William Sound Salmon Hatchery Management - **Proposals 49-55**

Commissioner Vincent-Lang, Madam Chairman and Board Members:

United Fishermen of Alaska is the oldest and largest trade organization for commercial fishermen in the State of Alaska. UFA has engaged with the Alaska Department of Fish and Game (ADF&G) as well as the State Legislature and the Alaska Board of Fisheries (Board) regarding Alaska's hatchery programs for more than 40 years. UFA believes that Alaska's hatchery program is an example for the world of conservative and strategic integration of enhanced stocks with wild stocks.

Alaska's hatchery program isn't perfect and ongoing studies regarding straying and genetic robustness will help ADF&G and the regional planning teams to make necessary changes if and when they are required. However, the best time for these type of hatchery programmatic discussions is at the Board's hatchery committee meeting and during the Board's statewide meeting based on completed studies and known scientific information. For example, it's relatively easy to document salmon straying. However, it's much more complex to determine the amount of naturally occurring straying of wild stocks and whether or not straying of enhanced stocks adversely impacts wild stocks. In other words, the fact that straying occurs doesn't mean that, biologically speaking, straying is a problem to be solved.

Proposals 49-53 before the Board at your Prince William Sound finfish meeting are attempts to completely reshape Alaska's hatchery program and the decisions that make the program a success. The basis for these proposals is speculative: the proposer suggests that mixing of wild stocks and enhances stocks "is not reasonable segregation and is against the law".



Moreover, a host of terms suggested are not defined. For example, what does “reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks” mean? The issues raised and the changes proposed in proposals 49-53 are not unique to Prince William Sound. Adoption of one or more of these proposals is likely to impact all of Alaska’s hatcheries. The Board should reject proposals 49-53.

Proposals 54 and 55 are asking for direct reductions to Prince William Sound’s hatchery production. The basis for these proposals is a thesis that increased competition for food in the Gulf of Alaska is reducing western Alaska chum salmon and impacting Gulf of Alaska wild salmon. Our limited knowledge of ocean food abundance, variation (seasonal, annual or cyclical), direct migratory interfacing of salmon stocks as well as a host of other variables that are impacting salmon returns to Western Alaska would suggest that this thesis is also speculative and should not be the basis for hatchery regulation if the Board is relying on the best AVAILABLE scientific information. Moreover, wild pink salmon runs in the Gulf of Alaska are healthy with virtually all systems meeting escapement goals. The Board should reject proposals 54 and 55.

Thank you for your consideration of UFA’s comments regarding changes to the salmon hatchery management plans. UFA looks forward to further discussion regarding the State of Alaska’s hatchery program during the Board’s hatchery committee meeting in March 2022.

Regards,

Matt Alward
President

MEMORANDUM FOR THE BOARD

Alaska Bering Sea Crabbers • Alaska Longline Fishermen’s Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen’s Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area “M” Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing
Vessel Owners Assn Groundfish Forum • Kenai Peninsula Fishermen’s Association • Kodiak Crab Alliance Cooperative • Kodiak Regional
Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture
Association • Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse
Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska
Fisherman’s Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Setnetters
Alaska Fisheries Development Association



UNITED FISHERMEN OF ALASKA

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November 10, 2021

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

Re: UFA Opposes Board of Fisheries Proposals 49, 50, 51, 52, 53, 54, and 55

Dear Chair Carlson-Van Dort and Board of Fisheries members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. We have participated in the Board of Fisheries (BOF) process for over four decades and oppose proposals 49, 50, 51, 52, 53, 54, and 55.

UFA's Board of Directors met on October 27 and 28, 2020 prior to changes to the Board's meeting schedule and our members expressed multiple reasons why they were unanimously opposed to proposals 49, 50, 51, 52, 53, 54, and 55. These reasons include, but were not limited to the following:

- 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. It is a well-run stable program designed to increase salmon abundance and enhance fisheries while protecting wild stocks.
- Fisheries enhancement projects are carefully reviewed by the Department of Fish and Game, and through an established public process, before they are permitted and during all phases of operation. They are not permitted or allowed to continue if they have a significant negative effect on natural production.
- The Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters of all user groups. Their hatchery returns reduce harvest pressure on returning wild runs particularly in years of low abundance.
- The Alaska Hatchery Research Project is a multiyear study investigating wild/hatchery fish interactions in Prince William Sound and Southeast Alaska. When the results of this study are concluded, peer reviewed, and assessed, the Department of Fish and Game will have the tools necessary to better define wild/hatchery fish



interactions; and, in cooperation with the hatchery operators, will reasonably address any concerns that are scientifically supported.

- The guideline straying rate of hatchery stocks recommended in proposals 50, 51, 52, and 53 does not correlate to presumed straying rates that occur naturally nor does it consider annual variations in straying rates due to environmental conditions.
- If approved, Proposals 49, 50, 51, 52, 53, 54, and 55 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. Any reduction in opportunity would impact all the stakeholders, communities, and user groups significantly and would be especially hard hitting during years of low returns.

In closing, UFA respectfully requests the Board of Fisheries reject proposals 49, 50, 51, 52, 53, 54, and 55. Alaska's hatcheries have operated with significant Department of Fish and Game oversight and public participation for over 40 years. Production has been stable for over 30 years without negative impacts to other fisheries and there is no need to interrupt this successful program.

Regards,

Matt Alward
President

Cc: Commissioner Vincent-Lang, ADF&G

MEMORANDUM

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-Sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
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Vessel Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional
Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture
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Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska
Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
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November 10, 2021

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Submitted VIA: Alaska Board of Fisheries Comment Website

RE: Opposition Proposal 121

Dear Alaska Board of Fisheries Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 37 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

United Fishermen of Alaska is opposed to proposal 121 which seeks to close waters to commercial drift gillnet fishing in and around Coffman Cove. Several UFA members participate in this fishery and can attest to there being no safety issues documented in this area. In fact, this proposal served as the first, and only, communication fishermen who fish the area have ever heard or received about a perceived safety issue. As well, there has not been an increase in the number of gillnetters fishing around Coffman Cove as stated in the proposal¹.

If safety is a concern for the sport fishermen and sport guides who traverse this area, communication and education can easily solve the issue. The commercial fishermen and sport fishermen share the same small harbor and see each other often as they walk the dock. Several commercial fishermen have offered to help educate sport boat operators about the visual cues and setting patterns of gillnets, and how to navigate appropriately and safely when they are actively fishing. There have been some sport boat operators who have been receptive to this open dialogue.

When a person gets behind the wheel of a motorized vehicle they are also taking on the responsibility of operating that vehicle safely. That would include other people's property. This proposal punishes the victims of unsafe vehicle operation. It is akin to killing all the deer along the highway because they are a safety hazard to driving at high rates of speed.

Currently, commercial fishermen in the area give sport fishermen a wide-berth and do not set their nets in favored sport fishing spots, staying clear of the Triplet Islands northeast of the mouth of Coffman Cove. Commercial fishermen already make accommodations and concessions to the local sport fleet, and they are always open to communicate and share the resource and region.

¹ Personal communication with ADF&G



We ask the Board of Fish to take no action on this proposal and allow the local sport and commercial fishermen to work together to solve any concerns the authors of this proposal may have.

Regards,

Matt Alward
President

MEMORANDUM

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-Sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest
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Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Setnetters
Alaska Fisheries Development Association

UNITED SOUTHEAST ALASKA GILLNETTERS



PC247
1 of 2

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

November 11, 2021

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Dear Chair Carlson-Van Dort and Board of Fisheries members,

United Southeast Alaska Gillnetters is a non-profit organization dedicated to preserving, enhancing, and promoting the gillnet salmon fishery in southeast Alaska. We have approximately 175 fleet members and a board of nine permit holders. They represent each major community in the region, northern and southern at-large seats, and one seat for the "down south" guys. We are active in any venue we identify that may impact our fishery. This includes, but is not limited to, the Alaska legislature, the Federal delegation, the Alaska Board of Fisheries, Marine Stewardship Council, Forest Service, and NOAA. We have members actively participating on the SSRAA, NRSAA, and DIPAC boards, as well as at the Joint Regional Planning Team. We are members of United Fishermen of Alaska, and work within that group to promote and defend the fishing industry.

- United Southeast Alaska Gillnetters **oppose** proposals 49, 50, 51, 52, 53, 54, and 55.
- These proposals would either reduce or limit current hatchery production if implemented. Such action would cause economic hardship to fishermen, processors, coastal communities, and the state of Alaska.
- There is a careful public process, guided by the Department of Fish and Game, for permitting of enhancement projects or increases in production. Impacts of straying and wild stock interception are standard considerations in the process.
- There is currently an ongoing study regarding hatchery and wild stock interactions. When this study is completed and peer reviewed, the department of Fish and Game will have a better understanding of the impacts and/or benefits of hatchery production on wild stocks, and be able to make scientifically sound adjustments.

Enhanced salmon production is and has been relatively stable for a very long time. Fishing businesses, communities, processors, personal use/sportfish, and the state of Alaska have all seen the benefits and economic returns of this important part of the fishing industry. Please reject proposals 49, 50, 51, 52, 53, 54, and 55.



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Sincerely,

A handwritten signature in black ink, appearing to read "Max Worhatch".

Max Worhatch, Executive Director, USAG

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY

P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com



November 11, 2021

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: Proposal 49 – 5AAC24.370 Prince William Sound Management and Management and Salmon Enhancement Allocation Plan
RE: Proposal 50 – 5 AAC 24.365 Armin F. Koernig Salmon Hatchery Management Plan
RE: Proposal 51 – 5 AAC 24.363 Cannery Creek Salmon Hatchery Management Plan
RE: Proposal 52 – 5 AAC 24.366 Solomon Gulch Salmon Hatchery Management Plan
RE: Proposal 53 – 5 AAC 24.368 Wally Noerenberg (Ester Island) Hatchery Management Plan
RE: Proposal 54 – 5 AAC 24.370 Prince William Sound Management and Salmon Enhancement Allocation Plan
RE: Proposal 55 - 5 AAC 40.1XX. New Section

Chairman Carlson-Van Dort, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments on proposals submitted to the Alaska Board of Fisheries (BOF) at the Prince William Sound/Upper Copper/Upper Susitna Rivers Finfish & Shellfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) provides the following comments **in opposition to Proposals 49-55**.

Proposals 49-55 are interrelated and similar in that the proposals intend to reduce hatchery production through board action by amending Prince William Sound (PWS) hatchery regulation governing hatchery management plans. VFDA's comments are therefore interrelated and applicable to each of these proposals.

VFDA opposes these proposals because if adopted, they will have significant negative effects on PWS hatcheries, and will have similar impacts to all other Alaska salmon fishery enhancement programs. Cascading effects of these regulatory amendments, which force hatchery operators to comply with arbitrary and yet to be defined straying limits, then impose a penalty of egg take reduction, immediately or over time, will significantly change Alaska's fisheries and create unnecessary economic harm.

If adopted, the Boards actions will negatively impact the sport, commercial, subsistence, and personal use fisheries, and place hatchery operators at risk for financial hardship during times of low abundance. The state of Alaska has invested heavily in its hatchery programs through its fisheries enhancement loan programs and has a vested interest in the long-term viability of PWS hatcheries and the benefits they provide to commercial fisheries and coastal communities. Reductions in hatchery capacity are likely to have a negative effect on fisheries enhancement lending and debt service ability.

Alaska's Constitution, Article VIII, Section 4 requires the state to manage its fisheries resources on a sustained yield principal. The Alaska Dept. of Fish and Game (ADF&G) conforms to this constitutional requirement through the application of various fisheries regulations, such as 5 AAC 39.222 - Policy for the Management of Sustainable Salmon Fisheries, and department policy on genetics and pathology. Further public input to plan production and address stakeholder questions are addressed annually through the approval of hatchery Annual Management Plans and adoption of regional Comprehensive Salmon Plans (CSP). These public processes provide tools to annually review and approve hatchery operations and consider effects of enhancement programs in each area. To codify questions of complex



Proposal 49 – 5 AAC 24.370 Prince William Sound Management and Salmon Enhancement Allocation Plan

5 AAC 24.370 was adopted to equitably distribute returns of enhanced salmon produced by the Prince William Sound Aquaculture Corporation (PWSAC). This allocation plan, with a long history of intense board and stakeholder engagement, was adopted with a singular purpose:

“to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial fisheries, and to reduce conflicts between these user groups “.

The PWS allocation plan is not intended to, nor should it be used, to address questions of complex hatchery/wild salmon interactions. There is little benefit to significantly changing a plan that exists to determine allocation of enhanced stocks among common property harvesters. Proposed amendments will likely increase the difficulty of implementing 5 AAC 24.370 by introducing arbitrary requirements, and yet to be defined, in season management directives. Any changes to the plan should be aligned with the intent of the plan and initiated by those that have a vested interest in the allocation of the fishery. Proposal 49 brings no benefit to the management for sustained yield of wild salmon, nor does it reflect the intent of this regulation. **For these reasons, VFDA opposes Proposal 49.**

Proposal 50, 51, 52, & 53

Proposals 50-53 prescribe the same amendments requested in Proposal 49, Article 3, Section 5 AAC 24.370 and applies it to the Cannery Creek Salmon Hatchery (.363), Armin F. Koernig Hatchery (.365), Solomon Gulch Hatchery (.366), and the Wally Noerenberg Hatchery (.368) management plans. These regulations establish Terminal and Special Harvest Area boundaries, dates for emergency openings, and authorizations for the harvest of hatchery fish for cost recovery and brood stock purposes. VFDA strongly disagrees that Section 5 AAC 24.363-368, is an applicable regulation to address the authors concerns and would offer the following objections and observations to these proposed amendments to Proposals 49-53:

5 AAC 24.

(e)(1) fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks[3]

The management for sustained yield of Alaska’s resources, including salmon, is guaranteed by the state’s constitution. This directive is the first responsibility of ADF&G and they do an outstanding job meeting this constitutional mandate through in season management actions to maximize the harvest of both enhanced and wild stocks to meet adopted wild stock escapement goals. The effectiveness of ADF&G’s management is evidenced by the regular achievement of escapement within the PWS management unit and the lack of salmon stocks of concern. Amending 5 AAC 24 to include this directive is redundant, being met currently by the department as required by state statute, and should be rejected.

(2) hatchery programs shall be operated without adversely affecting natural stocks of fish in the state[4]

A 40-year history of hatchery programs in PWS has shown that hatcheries are operated without adversely affecting the productivity of natural stocks. Wild pink salmon have remained genetically discreet and frequently produce robust returns of adult salmon, as evidenced by record natural returns of pink salmon over the last decade (2021-23.4MM¹, 2019-18.3MM, 2017-22.4MM, 2015-31.6MM, 2013-22.2MM²). This directive is currently met by the department through its oversight of PWS salmon hatchery programs and ongoing monitoring and research. This amendment to 5AAC.24 is unnecessary and should be rejected.

¹ Preliminary Pink Salmon Contributions for Area E Commercial Fisheries from Thermally Marked Otolith Samples 2021 - Preliminary

² 2020 PWS Area Finfish Management Report, Appendix D4 – Botz, Russell, Morella, Haught

- (3) hatchery programs shall be operated under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks;[5]



PWS hatchery permits were given considerable scrutiny during initial review and author ensure hatchery sites and stock selection achieve a *reasonable* segregation of hatchery fish from natural stocks. This continues through ADF&G and Regional Planning Team review processes, which are open for public comment, when considering Permit Alteration Requests, Fish Transfer Permits, and Remote Release Site approval. However, it is recognized and accepted that a complete separation is not possible and that some level of interaction and straying will always occur, particularly with pink salmon. PWS hatcheries are currently operating under a policy of management that follows this guidance as best as can be achieved, given the variances of nature. Amending 5 AAC 24 to include this directive without providing scientific justification for what is reasonable is unwarranted and should be rejected.

- (4) Hatchery program remote release sites shall be located in an area where a reasonable segregation from natural stocks occurs [6]

Like the approval of hatchery sites and stock selection, remote release sites are selected to provide reasonable segregation. Even though this same rigorous process of department review is observed, a complete segregation will never be achieved. PWS hatcheries are currently operated under a policy of management that achieves this as best as possible, given the variances of nature. As previously stated, amending 5 AAC 24 to include this directive without providing specification for what is reasonable is unwarranted and should be rejected.

- (5) hatchery operations and specifications must be consistent with the comprehensive regional salmon plan approved under AS 16.10.375 [7]

Alaska Statute 16.10.375 in its entirety simply states:

The commissioner shall designate regions of the state for the purpose of salmon production and have developed and amend as necessary a comprehensive salmon plan for each region, including provisions for both public and private nonprofit hatchery systems. Subject to plan approval by the commissioner, comprehensive salmon plans shall be developed by regional planning teams consisting of department personnel and representatives of the appropriate qualified regional associations formed under AS 16.10.380 .

PWS hatchery operations and specifications are consistent with AS 16.10.375. Amending 5AAC.24 to require this directive serves no purpose and should be rejected.

- (6) the department and board shall define and validate straying proportions “based” on the best available scientific information” to sustain productivity, without adversely affecting, or jeopardizing sustained yield of wild naturally occurring salmon[8] [9]

In 2012, ADF&G and a diverse group of fisheries scientists, began the Alaska Hatchery Research Project (AHRP). This multiyear study will attempt to quantify exactly what the above amendment seeks to require. That study is expected to conclude in 2024 and will likely be completed at a cost of \$18MM. Until the results of this exhaustive study on the effects of hatchery pink and chum salmon in PWS and Southeast Alaska is concluded, and the results of the study are peer reviewed and assessed, ADF&G will not have the tools to define what this amendment would require today. Amending 5 AAC 24 to include this directive, which is currently being conducted by a very lengthy and costly research project, is not necessary and should be rejected.

- (7) validated proportions of benign hatchery salmon straying are defined as chinook xxx%; sockeye xxx%; coho xxx%; chum xxx%, pink xxx%

The AHRP has yet to define what proportions of benign hatchery salmon straying might be acceptable or provide a definitive answer to the question of whether hatchery straying is significantly affecting natural stocks. Defensible scientific analysis remains to be concluded in

order to propose sustainability guidelines for hatchery production. Therefore, it is not appropriate for the board or the department to impose an arbitrary straying percentage at this time, nor is it appropriate to adopt a regulation that is open ended or subject to interpretation. For these reasons, this amendment to 5AAC.24 should be rejected.



- (8) *Until the department and board have a policy of management that justifies and validates this reasonable segregation, of straying proportions without jeopardizing wild stock sustained yield,[1] the CSP and genetics policy 2% rule will be adhered to within wild naturally occurring streams[10]*

The “guideline” of 2% straying of hatchery stocks referenced in the PWS CSP has not been formally adopted, nor is it found in the ADF&G genetics policy. To the contrary, the state’s genetic policy provides rationale why a single rate of straying is not appropriate given a multitude of factors. This rigid trigger for straying does not correlate to presumed rates found in nature for pink salmon, and so there is no consensus for its adoption as a management tool. The CSP states:

“The PWS/CR RPT recognizes that the present estimate of the acceptable threshold of hatchery-salmon straying [2%] is not well supported. Further research is needed to improve our confidence in the estimate of acceptable hatchery-salmon straying rates.”³

This amendment does not define which metrics will be used or how they would be considered. Will it be by stream, district, or region? Stray rate or stray proportion? What considerations are given for effects of fishery management on straying. Insisting on a 2% threshold for hatchery pink salmon is not scientifically supported, and is not a realistic expectation to be placed on PWS hatchery operators; it certainly should not be used as a yardstick to measure hatchery production given continued persistent wild stock structure after decades of enhancement. For this reason, this amendment to 5AAC.24 should be rejected.

- (9) *when proportions of hatchery salmon straying exceed validated percentages, jeopardizing sustained yield of wild fish stock, production shall be ramped down the following spring, from each Remote Release Site, hatchery or THA source incrementally until adverse effects cease[11],[12]*

The adoption of amendments (7)(8) and (9) create an unmanageable and unreasonably burdensome requirement on PWS hatcheries, and is designed to begin the complete elimination of hatchery pink and chum salmon production in PWS. Amendment 7 requires ADF&G to conduct costly and extensive research to determine a benign rate of hatchery straying for each species. Until that is completed, Amendment 8 requires the department adhere to a 2% hatchery stray rate that is not supported based on scientific evidence of inherent pink and chum stray rates, particularly for pink salmon. This amendment requires that if straying exceeds this arbitrary threshold, hatchery production will be ramped down incrementally until it eventually reaches a level that is unsustainable to the hatchery associations. It should be noted that the author provides no fiscal note, or consideration the effects of the proposed amendments will have on hatchery management plans, aquaculture association’s ability to repay fisheries enhancement loans, or lost harvest opportunities to sport, commercial, subsistence, and personal use. It also would impose a board directive on the department to conduct research which will be extensive both in time and cost. For these reasons, this amendment and all others proposed to 5AAC.24 should be rejected. **VFDA strongly opposes Proposals 50, 51, 52, & 53.**

Proposal 52 - 5AAC 24.366 Solomon Gulch Salmon Hatchery Management Plan

VFDA provides these specific comments on Proposal 52 to clarify the operations and management of VFDA’s Solomon Gulch Hatchery (SGH). The SGH was permitted in Port Valdez because it does achieve *reasonable* segregation of returning hatchery salmon from surrounding natural stocks. The donor stock propagated by VFDA is of early season Eastern District run timing, providing a 10-20 day period before district wild stocks arrive. In addition, the hatchery’s location provides the ability to conduct

³ PWS-Copper River Salmon Management Plan Phase III - 1994

terminal harvest fisheries away from natural stocks, further separating the effects of the commercial fishery on Valdez Arm wild salmon. By design, the SGH complies with the states genetics policy to achieve segregation by spatial and temporal isolation of hatchery stocks. VFDA conducts no releases of pink salmon in PWS, however VFDA does release approximately 20,000 Coho salmon annually at the Native Village of Tatitlek for subsistence harvests by village residents.



The author's statement that, "*the SGH salmon is one of the prime offenders creating unacceptable inter-regional hatchery straying from PWS into LCI wild significant stocks*" is a mischaracterization of the magnitude of SGH marks that have been found in LCI streams. The author's claims that these fish are harmful, or massive in numbers, is unfounded. Of note, limited sample data was chosen to provide this unsupportable statement of SGH hatchery strays to LCI streams. The actual hatchery proportion of SGH marks in LCI streams made up only 0.5% in 2014, 3.0% in 2015, 1.4% in 2016 and 5.5% in 2017, based on data collected from this opportunistic sampling fieldwork.⁴ Straying of SGH pink salmon within PWS has been determined to be low as well, primarily due to its early return timing and use of local brood sources close to SGH. ADFG sampling in 2012 found the average proportion of SGH strays in PWS streams to be approximately 2.3%.⁵ Preliminary findings by the AHRP reported that the proportions of SGH otolith marks in PWS streams are low as well. **For the reasons stated above and here, VFDA strongly opposes Proposal 52 and others like it.**

Proposal 54 – 5 AAC 24.370 Prince William Sound Management and Salmon Enhancement Allocation Plan

Proposal 54 reduces the production of PWS enhanced chum salmon to a production level of 24% of year 2000 levels by direct board action. This proposal fails to provide good reason why this proposal should be linked to the allocation plan. The economic impacts of this arbitrary reduction to PWSAC chum production will have a significant impact on PWS harvesters and the Sound's coastal communities. It will have a disruptive effect on the allocation plan and severely disadvantage one gear group or the other. This proposal relies largely on an unsubstantiated claim of an agreement between the hatchery operators and a previous administration to reduce hatchery production. VFDA is not aware of any such agreement, nor does the referenced Joint Protocol on Salmon Enhancement #2002-FB-215 set forth any such directives for these reductions. **For these reasons, VFDA opposes Proposal 54.**

Proposal 55 - 5 AAC 40.1XX. New Section

Proposal 55 references hatchery pink salmon. However, the proposal could be interpreted to reduce all hatchery produced species state wide by 25% from year 2000 production levels; it will also result in production losses much higher than 25% for some programs. This proposal will require the immediate reduction of 97.5 million pink salmon eggs (36%) of current SGH production. This will result in the loss of 5.3 million adult pink salmon worth an estimated ex vessel value of \$7.5MM annually to the PWS seine fleet, based on estimated average survivals and economic impact data. A reduction of 500,000 coho smolt (25%) will occur. The loss of sport fish opportunity to Southcentral/Interior fishermen is estimated to be 30,000 fish per year, creating far reaching impacts to businesses in Valdez and elsewhere. Millions in revenue will be lost to the seafood industry in first wholesale value, and lost tax revenue to the state and its municipalities. On a statewide level, these reductions will be far more devastating, including losses to the lodge and charter industries of coastal Alaska and the Copper River dip net fisheries, increasing pressure on natural stocks during times of low abundance. The statement of overproduction fails to recognize that PWS hatchery pink salmon production has remained stable from 1991-2015 and PWS hatchery pink salmon equates to approximately 7% of the total biomass of adult and juvenile pink salmon in the North Pacific using data provided by the North Pacific Anadromous Fish Commission. The vast majority are of natural origin. **For these reasons, VFDA opposes Proposal 55.**

Since the inception of private non-profit salmon hatchery programs, the state has relied on the application of robust scientific research to guide hatchery operations and permitting. The BOF has focused its regulatory responsibility on the allocation of enhanced resources and has never weighed into areas of

⁴ Observations of Pink Salmon Hatchery Proportions in Selected LCI Escapements – Otis, Hollowell, Ford 2018

⁵ Straying of Hatchery Salmon in Prince William Sound, Alaska – Brenner, Moffit, Grant 2012

hatchery permitting or production; the department has justifiably administrated these. This separation of jurisdiction has served Alaska well and we urge the BOF to observe historic practice when considering requests from individuals for direct board action to limit or reduce hatchery production.



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6 of 6

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on these proposals. We would respectfully request that the board reject Proposals 49-55 or any other request to amend hatchery production. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike H. Wells".

Mike H. Wells
Executive Director

Submitted By
Wade Buscher
Submitted On
11/15/2021 8:58:34 PM
Affiliation



PC249
1 of 2

Phone
8086460831
Email
alaskamolokai@gmail.com
Address
PO Box 1032
Cordova, Alaska 99574

Proposal 5) **Oppose**

Copper River King Salmon Management Plan;

In January of 2020, an ADF&G committee made up of both divisions of Sportfish and Commercial Fisheries recommended an SEG for Copper River Chinook in the range of 21,000-31,000.

The proposal by the Kenai River Sportfishing Association to use an OEG instead of an SEG to increase the range of Chinook to 24,000-40,000 would unjustifiably limit opportunity for the commercial fishery, and may also drastically increase the sockeye escapement upriver to a point of overescapement.

Please allow the ADF&G to continue to manage the Copper River fishery in a biologically sensible manner, utilizing the best science available to determine the proper SEG, on behalf of ALL user groups.

Proposal 6) **Support**

Catch numbers in the commercial fishery are critical to in season management. Every fish is accounted for, and ADF&G utilizes these numbers in real time to either allow or restrict the commercial fishery. All data is good data, so if it helps to have all user groups record their catch in a timely manner, in real time, it would be beneficial to management to have these numbers when making regulatory decisions. I don't believe that submitting catch numbers on a daily basis would be a hardship for any user group.

Proposal 7; **Support**

Proposal 18; **Oppose**

Rules and regulations are necessary to limit and manage resource over-utilization. Customary and Traditional use in the Copper River Dipnet Fishery was probably limited to the area specified in the regulations, and probably pertained mostly to a dipnet fishery. Larger and bigger dipnets, river skiffs, and charter operators, have allowed greater access and increased efficiency in the Copper River Dipnet Fishery. The authors of this proposal proclaim,

"This small increase in size of the Chitina Sub-district is unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan."

However, extending the CPUDF boundry would likely lead to more boats on the river, as well as set a precedent to extend the boundry again in the future as boating pressure increases. At some point there will need to be limitations placed on the number of boats inriver to prevent these "dangerous navigation hazards" from happening.

Proposal 19; **Support**

While subsistence users have the unique qualification of having priority over other resource users (sport, PU, Commercial), in years of low salmon abundance, it makes sense that these lower priority user groups should share in the conservation effort so that subsistence and sustainability objectives are met.

Proposal 20; **Support**

Just as the commercial fishery is managed based on real time data, so to should the up river fisheries. Household limits in the PU fishery should be limited by abundance. If there is a large return of sockeye then limits should be liberal, and if low returns, then limits should be

more conservative. Management has the tools to regulate the upriver fishery utilizing in season data. As climate change variables affect salmon returns on the Copper, it is prudent to manage conservatively. The bag limits in the PU fishery should be set conservatively, and increase as the abundance warrants.



Proposal 21; **Oppose**

Chinook numbers on the Copper River have seen a decline in recent years. Any opportunity for Chinook to make it to the spawning grounds should be of the highest priority. The commercial fishery has seen restrictions in time and area to address this concern. (Boats are no longer able to fish inside the Barrier Islands where Chinook are known to be in the beginning of the season.) It would be counter intuitive to allow the PU fishery to commence earlier than usual, while these Chinook are in transit to their spawning grounds.

Submitted By
Wayne McClure
Submitted On
11/15/2021 11:39:09 PM
Affiliation



PC250
1 of 1

Proposal #9 is a removal of a person's right to provide for their families soon there will be no rights to fish and maintain the natural resource... All because you have over controlling group of people saying it is being depleted of fish.... Please do not pass proposal 9... there are other ways to manage it.



November 14, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th 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 Juneau and have been a researcher for more than 40 years in both biological and technological fields. I have over 20 years member-at-large of the board of directors of PWSAC and I am the Chair of the Fisheries Standards Committee (Conformance Criteria Committee) at the Alaska Responsible Fishery Management Program. I also am a Member of the Alaska Hatchery Research Project Science Panel.

I'm a retired emeritus professor at the University of Alaska. I have conducted research on hatchery-wild interactions and salmon conservation in PWS from the beginning of hatcheries in the 70s until the present. I've authored over 50 peer-reviewed research papers and 11 peer-reviewed perspective and review articles on these topics. Contrary to popular perception releases from PWS hatcheries have not markedly increased for several decades. Important research innovations that I have participated in and that have been supported by the hatchery system notably include the development of a mass marking technology, otolith thermal marking which enabled targeting harvesting of hatchery stocks to the benefit of wild stocks and which enabled direct study of straying, and the ongoing Alaska Hatchery Research Project which is providing remarkable information on stock composition, straying, and it's biological effects in PWS. Over the decades the PWS hatchery system has provided demonstrable important benefit to the salmon industry and the Alaska economy, particularly in years of low wild production. Despite whatever biological interaction that has occurred between hatchery-produced and wild salmon in PWS (ecological, straying, interbreeding) over 4 decades/20 pink salmon generations the productivity of wild populations remains apparently high.

As detailed in a series of econometric studies by the McDowell Group the PWS salmon fisheries are a significant contributor to Alaska's economy and therefore benefits my own community. As an Alaskan with a constitutional responsibility for salmon stocks I trust the regulation of hatcheries and of fisheries by ADFG and the RPT process to protect the productivity of salmon stocks in PWS. ADFG and the PWS RPT have demonstrated their ability to govern the scope and operation of hatcheries in PWS.

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,

William Smoker
wsmoker@gmail.com
(907) 321-3602



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 27, 2020

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, AK 99811-5526

Subject: Comments on 2020-2021 Alaska Board of Fisheries Proposals for Prince William Sound Finfish and Shellfish

Dear Ms. Carlson-Van Dort:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met by teleconference on October 5 and 6, 2020. The commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At this meeting, the SRC reviewed the Alaska Board of Fisheries proposals being considered during 2020-2021 meeting cycle and would like to provide the following comments.

PROPOSAL 6: Require in-season reporting of subsistence, sport fish, and personal use harvest and effort

The Wrangell-St. Elias National Park Subsistence Resource Commission supported Proposal 6 with a vote of 6 support, 1 opposed, and 1 abstention. Requiring in-season reporting of subsistence, sport fish and personal use harvest and effort will provide information for better in-season management, especially in low run years. Managers will have information to inform potential restrictions or closures of the personal use or subsistence fisheries.

PROPOSAL 13: Prohibit dip netting from a boat within 75 feet of an operating fish wheel in the Glennallen Subdistrict

The Wrangell-St. Elias National Park Subsistence Resource Commission supported Proposal 13 with a vote of 5 in support and 2 opposed. The commission heard public testimony about an increasing number of boats on the river, and some boats are fishing directly in front of fish wheels. When they come close to the fish wheels, boats can create a wake that disturbs the fish wheels, resulting in dangerous conditions for the fish wheel operator. Prohibiting dip netting from a boat within 75 feet of an operating fish wheel would help to alleviate the problem.

Chair: Daniel Stevens; Members: Mike Christenson, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan



PROPOSAL 14: Prohibit the use of gillnet mesh in dip nets

PROPOSAL 15: Prohibit the use of gillnet mesh in dip nets

The Wrangell-St. Elias National Park Subsistence Resource Commission opposed both Proposal 14 and Proposal 15 with a vote of 1 in support and 7 opposed. In the experience of SRC members who have commercial fished, net material doesn't make a difference in whether fish become entangled in a net. When one SRC member commercial fished one summer, for example, salmon were often gilled on an inelastic braided net. Net size or mesh size, in their experience, were bigger factors than the material. Another concern is a lack of availability of dip nets made from alternate materials. The person who supported the proposal cited testimony on both sides, with some saying the monofilament nets cause damage, and expressed concern about avoiding any potential negative impacts to the fisheries.

PROPOSAL 16: Prohibit the use of depth or fish finders on boats in the Upper Copper River District

The Wrangell-St. Elias National Park Subsistence Resource Commission supported Proposal 16 with a vote of 6 in favor and 2 opposed. When the Chitina personal use fishery is open, many people fishing in the Chitina area of the Glennallen Subdistrict don't get any fish. And the use of fish finders makes this worse.

PROPOSAL 18: Extend the lower boundary of the Chitina Subdistrict downstream ½ mile

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 18. There is plenty of room for people to fish, including the area upstream of Woods Canyon, but many boats are gathering where the river enters the canyon, trying to take advantage of the funneling of the canyon. Additionally, the proposed boundary extension could exacerbate the problem with upstream fishers not getting any fish in their wheels when the personal use fishery is open.

PROPOSAL 19: Reduce the maximum harvest level in the Chitina Subdistrict Personal Use Fishery when the Copper River commercial fishery harvest is 50% below the 10-year average on June 1

The Wrangell-St. Elias National Park Subsistence Resource Commission opposed Proposal 19 with a vote of 2 in support and 5 opposed.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Daniel E. Stevens".

Daniel E. Stevens
Chair

cc: NPS Alaska Regional Director
Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Daniel Stevens; Members: Mike Christenson, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan