



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
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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:

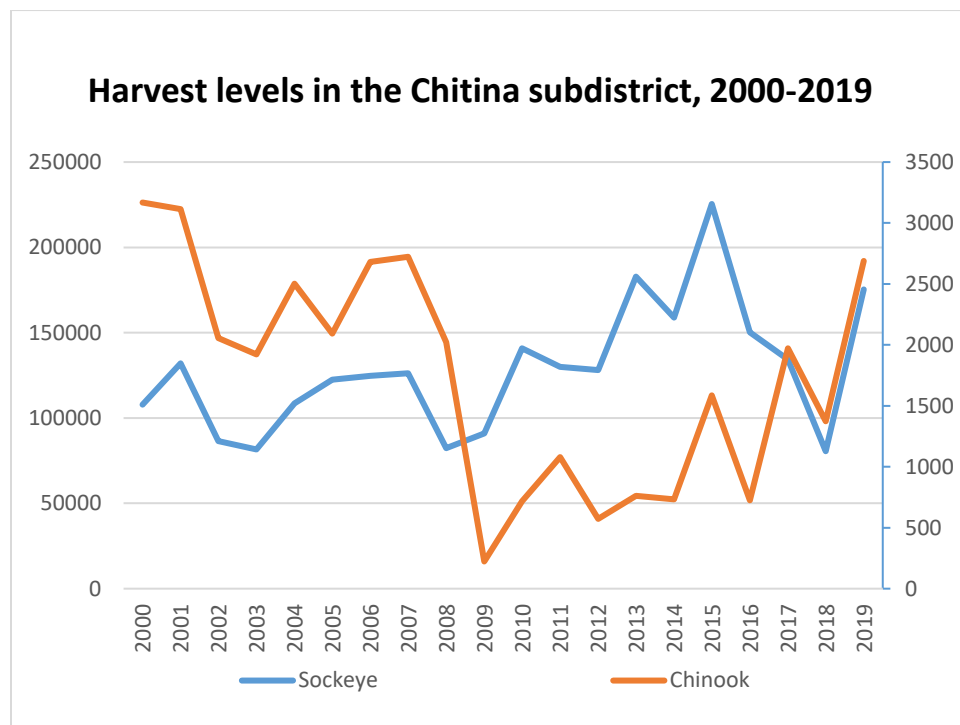
If the Copper River District commercial harvest is 50% below the 10 year average by June 1 the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

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.

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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.

References

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- Schwanke, C.J. 2019. Run Timing and Spawning Distribution of Copper River Chinook Salmon. Alaska Department of Fish and Game, Regional Operational Plan SF.3F.2019.04, Anchorage.
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Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

October 29, 2021

ADF&G Support Section
ATTN: Board of Fisheries Comments
P.O. Box 115526
Juneau, Alaska 99811-5526
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.

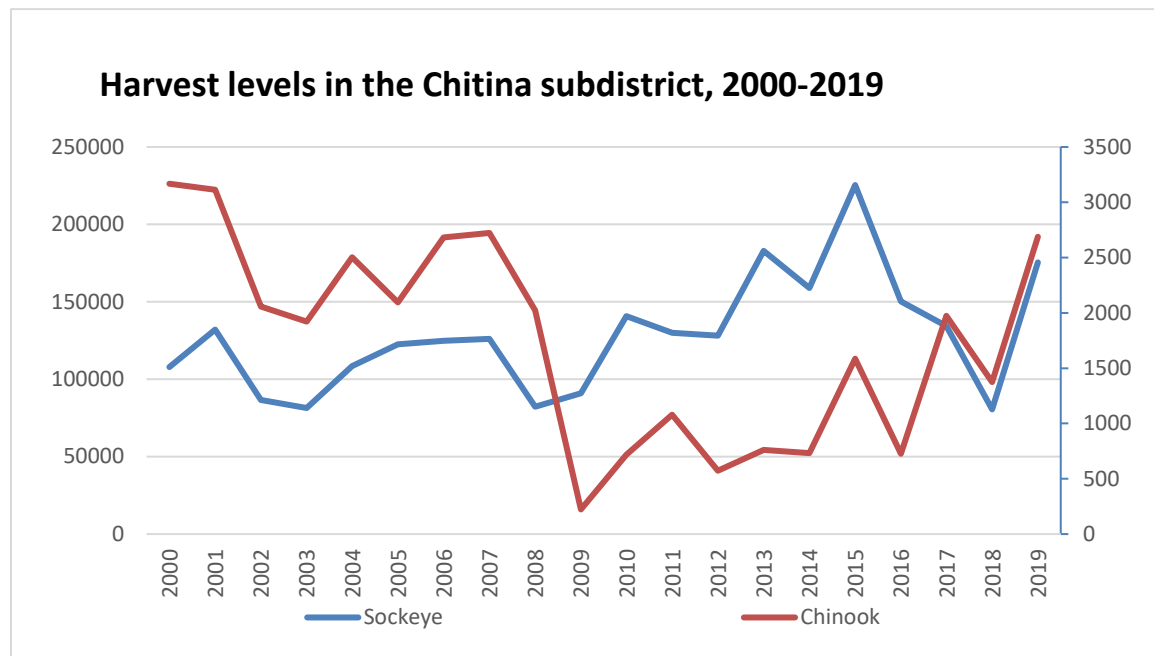
What is the issue you would like the board to address and why? In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not. In an effort for this burden of conservation to be shared amongst all user groups, 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 (ADF&G) 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. ADF&G 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: dff.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
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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

Phone
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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
Area E gill net, seine, sport, subsistence

Phone
2067398224

Email
andrewmcfadden12@gmail.com

Address
PO Box 1163
Cordova, Alaska 99574

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
Affiliation
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Cordova, Alaska 99574

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
Andrew McFadden
Submitted On
11/15/2021 5:10:39 PM
Affiliation
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2067398224

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Address
PO Box 1163
Cordova, Alaska 99574

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



Submitted By
Andrew McFadden
Submitted On
11/15/2021 5:13:20 PM
Affiliation
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Address
PO Box 1163
Cordova, Alaska 99574

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
Affiliation
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Cordova, Alaska 99574

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
Andrew McFadden
Submitted On
11/15/2021 5:15:29 PM
Affiliation
Area E gill net, seine, sport, subsistence

Phone
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Email
andrewmcfadden12@gmail.com

Address
PO Box 1163
Cordova, Alaska 99574

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
Affiliation
Area E gill net, seine, sport, subsistence

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Email
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Cordova, Alaska 99574

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
Affiliation
Area E gill net, seine, sport, subsistence

Phone
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Address
PO Box 1163
Cordova, Alaska 99574

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
Affiliation
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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
Affiliation
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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
Area E gill net, seine, sport, subsistence

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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



PC011
1 of 4

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Po. Box 2046
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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
Affiliation



PC011
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
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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



PC013
1 of 1

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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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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.

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 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
Brooke.poirot@me.com
(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



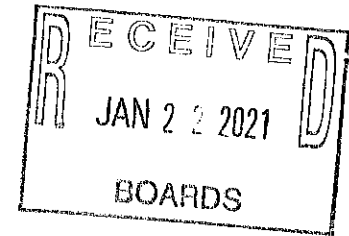
PC028
1 of 1

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
ckblohm@aol.com or ckblohm@gmail.com
801 787-6676



Submitted By
Cathy Renfeldt
Submitted On
11/15/2021 11:22:48 PM
Affiliation
Cordial Chamber of Commerce



PC030
1 of 2

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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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5115 n Douglas hwy
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

Phone
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cfrey09@gmail.com
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9620 Arlene Dr
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 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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Email
Perrett@cvalaska.net
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, reading "Charles W. Totemoff".

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

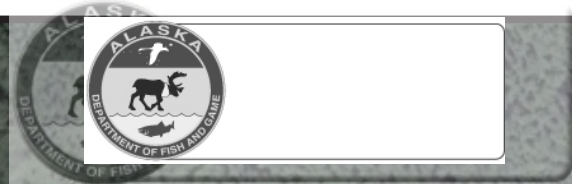
Eliminate the Customary and Traditional finding for finfish other than salmon in the Chitina subdistrict.

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 →

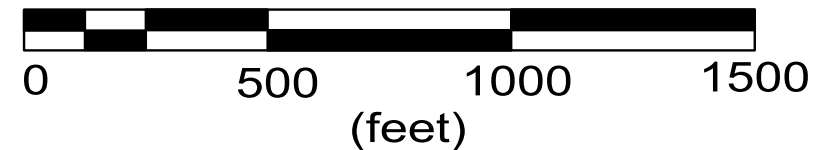
(Recapture Station ~ 1.4 miles down river
from lower limit of Proposed PU Limit)

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

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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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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

CITY OF CORDOVA



PC043
1 of 3

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

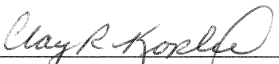


BE IT FURTHER RESOLVED THAT the Council of the City of Cordova, Alaska does hereby support proposals: 1 (diversification into different fisheries would be beneficial for Cordova fishermen), 6-10, 14, 15, 19 (these seven proposals aim to responsibly regulate sport and personal use), 38-40 (these will 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 .

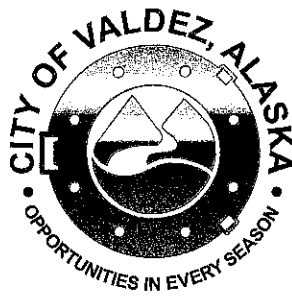
PASSED AND APPROVED THIS 10th DAY OF NOVEMBER 2021.




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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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,

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>



Cordova District Fishermen's United 2021 BOF Written Comments Prince William Sound Meeting

					<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.



Cordova District Fishermen 2021 BOF Written Comments Prince William Sound Meeting

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	



Cordova District Fishermen's United
2021 BOF Written Comments
Prince William Sound Meeting

	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	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. 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
19	Reduce the maximum harvest level in the Chitina Subdistrict Personal Use Fishery when the	N	Gillnet Division	Strongly Support	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,



Cordova District Fishermen United 2021 BOF Written Comments Prince William Sound Meeting

	<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	



Cordova District Fishermen's United 2021 BOF Written Comments Prince William Sound Meeting

	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>



Cordova District Fishermen's Union 2021 BOF Written Comments Prince William Sound Meeting

					<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	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.
46	Repeal limitations on use of deep gillnet gear. <i>Ezekiel Brown</i>	N	Seine, Gillnet Divisions	Seine Division - Oppose Gillnet Division - Oppose	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. 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.



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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?**



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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
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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