

Submitted By
Adam Hackett
Submitted On
1/19/2022 4:53:59 PM
Affiliation



PC378
1 of 1

As an Alaskan, and a commercial and sport user of King Salmon, I strongly urge BOF to oppose proposal #83. Liberalization of the sport charter industry is harmful to thousands of families around Southeast who depend on treaty King Salmon to feed children and make house payments. We should support these families and existing business before encouraging further business growth reliant upon struggling fish populations.

February 23,2022



PC379
1 of 1

Alaska Board of Fish

Attention Board of Fish Members

I have written many letters (Proposals 171, 172,173) trying to inform you on the effects of changing the start date of the Spot Shrimp Season from October to May. As a board member here are some questions that need to be asked and answered.

Questions

1 - A lot of fishermen have both Dungeness Crab Permits and Shrimp Permits, when October comes around they have to choose one or the other. If the shrimp opener gets changed to May they will be able to fish both permits which will put more pressure on the winter Crab and spring Shrimp. Right now most fishermen go Shrimping in October. **Do the fishermen in support of the change, support it so they can participate in both fisheries?**

2 - **The Biologists that support the change to May, are they willing to drastically change the Spot Shrimp fishery without any records on the effect that it will have on the fisheries?** Alaska biologists manage the Beam Trawl fisheries which harvest shrimp all winter long, those shrimp are ready to hatch as you can see the eyes in the eggs - they drag up Spot Shrimp too.

3 - When I hear that Biologists and Management support a proposal that would drastically change the Spot Shrimp because they don't want to harvest Shrimp carrying eggs, that doesn't make sense. The Biologist managing the Beam Trawl Fishery let that fishery drag all winter long catching shrimp, which most, have eggs. **How does that help the fishery? Are the Biologists working together for the sake of the fisheries?**

I'm just saying what I am seeing and hearing. Remember, little shrimp are males, big shrimp are females caught with or without eggs. Please leave the season alone.

If you have any questions, please call Alan Reeves 907-874-3619.

Thank you.

Alan Reeves
F/V Chopaka
907-874-3619



February 18, 2022

Sent Via Electronic Mail

Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811
dfg.bof.comments@alaska.gov

Re: AFN opposition to Proposal 161 - Southeast Finfish and Shellfish

Dear Chairperson Marit Carlson Van-Dort and Board of Fisheries Members:

On behalf of the Co-Chairs and Board of Directors of the Alaska Federation of Natives (AFN), I write to share our concerns and strong opposition to proposal 161 that is in front of the Alaska Board of Fisheries for consideration.

Subsistence is the foundation of Alaska Native society. Today, the vast majority of Alaska's Native people still participate in hunting, fishing, and gathering for food. Subsistence resources remain central to the nutrition, economies, and traditions of Alaska's Native peoples. As such, AFN strongly opposes proposal 161.

I have attached a position paper from the AFN Subsistence Committee regarding our concerns with proposal 161.

Thank you for your consideration. If you have questions, please feel free to contact me directly at (907) 274-3611.

Sincerely,

Julie Kitka
President

Cc: Alaska Governor Mike Dunleavy



OPPOSITION TO ALASKA BOARD OF FISHERIES PROPOSAL 161 - SUBSISTENCE HERRING FISHING PERMITS

I. Background

Proposal 161 would require a subsistence fishing permit to harvest herring roe (herring eggs) on branches in the Sitka Sound area. Currently, herring eggs from Sitka Sound are harvested for traditional and customary purposes each spring and distribution to Native communities throughout Alaska. As such, AFN opposes proposal 161.

Subsistence is the foundation of Alaska Native society. Today, the vast majority of Alaska's Native people still participate in hunting, fishing, and gathering for food. Subsistence resources such as the herring eggs from the Sitka Sound area remain central to the nutrition, economies, and traditions of Alaska's Native peoples.

Those advocating this proposal simply do not understand the nature of this subsistence fishery and the damage that this proposal would inflict on Alaska Native culture. As ADF&G's 2021 Sitka harvest subsistence study verifies, only 8% of the herring eggs harvested in this subsistence fishery are consumed by the harvester and his/her household; the other 92% are distributed to Alaska Natives throughout the state and indeed nationwide.¹

Anthropologist Dr. Steven Langdon stressed in his 2021 report that this kind of extensive and institutionalized sharing is sinew that holds Alaska Native culture together:

As a central value and practice characteristic of all Indigenous Alaskan societies, sharing of subsistence resources was and is a foundation of Indigenous life and livelihood. Sharing is both glue in binding extended families together and lubricant promoting expansion of social ties.²

II. Cultural Importance of Sharing Subsistence Resources

The sharing of subsistence-harvested Sitka herring eggs is a foundational and unifying element of Native culture. It binds Native communities together, reinforces core cultural values, and holds a special place in many Native ceremonies and traditions. As ADF&G recently noted, Sitka's herring eggs make such a singular contribution to Alaska Native's system of sharing because of the Sound's abundance:

Sharing is a characteristic of subsistence economies. In specialized harvests, such as herring eggs, where specific knowledge and skills and equipment are required for a successful harvest, sharing is even more

¹ Sill and Cunningham, *The Subsistence Harvest of Pacific Herring Spawn in Sitka Sound, Alaska*, ADF&G Technical Paper No 468 (Dec. 2021) at 8, 40 ("2021 Subsistence Study").

² Dr. Steve Langdon, *The Significance of Sharing Resources in Sustaining Indigenous Alaskan Communities and Cultures* (2021) at 30 (*emphasis added*).



profound...Because Sitka remains one of the best places to harvest herring eggs, harvesters send eggs well beyond Sitka households, reaching far throughout the state of Alaska...Reviewing past project years, it is clear that the majority of the harvest is shared every year, regardless of how good harvest year it is, how many community boats are harvesting, or how many participants there are in the fishery.³

There is a related reason for the outsized importance of Sitka's herring eggs to our Native system of sharing: there were once numerous subsistence herring egg fisheries in Southeast Alaska. Today, and except for a much smaller fishery near Craig, Sitka is the only remaining significant source of eggs to share. The others have been eliminated by commercial overfishing.

It is important to understand that Sitka eggs are shared in Native communities throughout Alaska, and any disruption in that sharing tradition negatively impacts our Native ways of life. Just this year, ADF&G documented egg sharing in more than 40 Alaska communities, including "Anchorage, Angoon, Bethel, Coffman Cove, Cordova, Fairbanks, Hoonah, Hydaburg, Juneau, Kake, Ketchikan, Klawock, Kotzebue, Metlakatla, Nome, Palmer, Sitka, Soldotna, Valdez, Wrangell, Yakutat, and Utqiagvik."

Proposal 161 creates a burden of a permit requirement that will endanger the foundational and unifying element of Native culture, and that is sharing traditional resources. It will turn a communal fishery into an individual fishery, with the harvest being linked to the individual. It may also discourage harvesters from continuing to harvest, therefore endangering our Native ways of life. When 92% of the subsistence herring egg harvest is sent to others, being asked to individually bear the entire administrative (and in many cases logistic) burden of a permit program (from application to post-harvest reporting), and solely face the shadow of possible enforcement action, undermines customary and traditional uses, practices, and needs of Alaska Native peoples.

The Sitka subsistence harvest is not just a gathering exercise; it is, in-and-of-itself, an important cultural event. Demanding a permit to engage in this cultural tradition is no different from requiring a state permit to hold a potlatch.

III. Limited Countervailing Benefit to Requiring Subsistence Permits

Proponents of Proposal 161 argue that the proposal will lead to more accurate information and data related to subsistence use of the Sitka sound herring resources. However, as ADF&G and its Subsistence Division have both pointed out: precisely the converse is true. A permit requirement, one that inevitably crowds out the existing joint Tribal/ADF&G reporting program, would result in less comprehensive data and possible underreporting of actual harvest:

- As ADF&G stated in its comments on Proposal 161: "Reasonably accurate harvest information can be obtained through the current [Tribal/ADF&G joint] harvest monitoring program," and "[a] permit and reporting of harvest requirement would not result in more

³ 2021 Subsistence Study at 23-24.



accurate harvest data...” *ADF&G Staff Comments* at 180. And, although ADF&G did surmise that the limited data received under a permit may be provided to the agency more quickly, this year ADF&G was able to receive, digest, and report upon 2021’s far more comprehensive subsistence data from the Tribal/ADF&G joint monitoring program by December 2021— easily enough time to influence this year’s spring fishery; and

- In its *2021 Subsistence Study* (pp. 1-2, n.1), the Subsistence Division stated:

Subsistence fisheries throughout the state of Alaska have varying requirements for harvest reporting: the majority do not require a permit. Based on salmon permit programs, permits can underestimate the actual harvest [cites omitted]. In addition, permit data decouple harvest from the broader context in which the resource is harvested. For example, permits do not document information about household demographics, sharing practices, or qualitative assessments about the harvests that provide important explanatory context needed for sensitive allocation decisions. A permit is required to subsistence harvest spawn on kelp in Southeast, but no other subsistence herring egg fisheries in the state require a permit.

IV. Recommendation

AFN recommends the Alaska Board of Fisheries reject Proposal 161. Proposal 161 will not facilitate better data gathering while the burdensome impacts of a permit would negatively impact the traditional and customary harvest of herring eggs.

This report was prepared by the AFN Subsistence Committee and the position was approved by the AFN Board of Directors at its February 15, 2022, meeting. Please contact Ben Mallott at bmallott@nativefederation.org for more information.



ALASKA GENERAL SEAFOODS

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February 22, 2022

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Comments on proposal 166

Dear Alaska Board of Fisheries Members:

Alaska General Seafoods (AGS) is a processor of Alaska seafood products with production facilities in Southeast Alaska, Bristol Bay, and other areas of the state. AGS, along with our parent company, Canadian Fishing Company LTD, has been a long time buyer and seller of both herring roe on kelp (ROK) and sac roe herring products in Alaska as well as British Columbia and California.

AGS urges the Board to support Proposal 166 and allow an open pound roe on kelp fishery in Sitka Sound. In addition to killing less herring by using open pounds this proposal promotes a change in the product forms available from the Sitka Sound biomass. AGS feels Proposal 166 represents a positive change to a fishery in Sitka Sound and addresses several of the concerns brought forward over recent years with regard to the fisheries viability, profitability, and, most importantly, sustainability.

One of the constraints to expanding the ROK market has been limited supply. Whereas the herring roe market is supplied with thousands of tons of finished product each season, the ROK market is supplied with several hundred tons each season.

Without the volume necessary to explore and support a possible new and ongoing consumption opportunity, the ROK market is stuck with the status quo.

Thank you for considering these comments.

Regards,

Brad Wilkins

SE General Manager

Alaska General Seafoods



Submitted By
Amy Daugherty
Submitted On
2/23/2022 4:28:41 PM
Affiliation
Alaska Trollers Association

Phone
9077232244
Email
alaskatrollers@gmail.com
Address
130 Seward St # 204
Juneau, Alaska 99801

2/23/22

Board of Fisheries Members

c/o Glenn Haight, Director

Juneau, AK 99811

RE: Opposition to Proposal 225

Dear Board of Fisheries Members,

Alaska Trollers Association represents the Power and Hand Troller permit holders dispersed throughout Southeast Alaska and up to Yakutat. We have fished throughout these waters for well over a century despite the general trend of considerably reduced allocation. Our artisan small boat fishermen often adjunct their salmon catches with species that are harvested by longline.

ATA opposes Proposal 225 for the following reasons: It claims to be abundance based but includes only a mechanism for increasing the bag and eliminating the annual limit. Second, proposal 225 asks for an increase when abundance is still below the GHIL levels observed when the equal share fishery was established and below levels when the bag limits were initially set. Third, the dramatic increase in nonresident sablefish harvest suggests ample opportunity is afforded for nonresident harvest, hence there is no legitimate rationale for reallocating sablefish from Alaska's hard working commercial fishermen to nonresident charter clients. Finally, this action will change bag limits for sablefish in state and federal waters but use only the abundance of sablefish in state waters as the index. That is a stretch of science and management authority.

Since bag limits were implemented in 2009 the nonresident catch increased 481% (by 2018) and accounted for 96% of the total recreational catch. During this same period, the commercial NSEI GHIL declined below 2009 levels, hitting a 39% reduction in 2016. However, in 2021, the commercial fishery is finally back to the 2009 level of 1.1 million pound GHIL, but this GHIL is still well below historic catch limits.

Clearly a 4 fish daily limit and an 8 fish annual limit is generous and provides both incentive and reasonable opportunity for nonresident anglers to target sablefish. There is no limit on charter vessels fishing for sablefish and there is an increasing unguided nonresident harvest. The non-resident sport fishery should be managed with an equal commitment to conservation. In 2018, 96% of the sport sablefish catch was taken by nonresidents. Non-resident sablefish harvest grew from 1500 sablefish to 5000 sablefish over the preceding 10 years. In contrast, in our established fishery, each of our permit holders hires 2-4 crew, who support their families, the processing sector, and their local communities with their fishing income.

We urge the Board to reject this proposal. Thank you for your consideration.

Sincerely,

Amy Daugherty



Submitted By
Alicia Maryott
Submitted On
2/23/2022 11:47:02 PM
Affiliation

Phone
9079576269

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Address
319 H St
Douglas , Alaska 99824

I strongly support the three proposals by the Sitka Tribe of Alaska - proposals 156, 157, 158. These proposals are designed to incorporate specific elements of traditional ecological knowledge into the management of the commercial herring fishery in Sitka Sound and will foster herring abundance, which will benefit everybody in the long run.

I strongly oppose proposals 159, 160, 161, 163, 164, 165, by sac roe seine permit holders and the herring seine lobby group the Southeast Herring Conservation Alliance. These proposals will lead to destructive high-grading and the renewed decimation of local stocks in the bays and inlets up and down the coast, and mark the industry's desire to expand the scope of their permits to fully capitalize on the emerging abundance of herring in Sitka and beyond.

I further believe that none of these proposals go far enough to affirm the fact of massive depletion of herring in the last century by commercial overfishing. This pattern has been devastating for indigenous people and coastal communities up and down the coast. The people of Southeast Alaska have been very clear for the last century in asking for an end to wasteful and destructive herring seining practices. This time of market failure for the fishery offers an ideal opportunity to take serious steps to foster abundance of herring populations up and down the coast of Baranof Island. We want wild abundance and shared prosperity for all creatures who depend on herring - not a parasitic commercial fishery.

Submitted By
Andrew Terhaar
Submitted On
2/19/2022 2:18:09 PM
Affiliation



PC384
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I have been a commercial troller out of Sitka for 11 seasons. I am writing to voice my opposition to proposition 83. I make my living solely from commercial trolling and fishing is an inherently unpredictable industry. The very short summer King Salmon fishery plays a very important role in my operation and every King Salmon is critical for my operation's success, even moreso in years of low abundance. Thank You, Andrew Terhaar F/V Audacious



Submitted By
Asanti Sanborne
Submitted On
2/23/2022 1:39:31 PM
Affiliation

Phone
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PO BOX 1146
Haines, Alaska 99827

To the Honorable members of the Board

This is an updated version of a previous comment due to new ADF&G information forwarded to me concerning the percentage of Chilkat Kings from the genetic sampling taken in Skagway in 2013.

I am a resident of Haines Alaska and the owner/operator/guide of Haines Family Fishing Charters operating in the waters of Upper Lynn Canal for nearly a decade.

As such I am well aware of the decline in returns of King Salmon from Alaska to California. The species is suffering world wide declines and we are all aware of the many conservation policies enacted by state and federal agencies to protect this vital species.

High ocean mortality is the given reason for these declines and has been attributed to many factors including increased predation, commercial overharvest, unusually warm ocean temperatures i.e. the blob and El Nino, extreme river levels, foreign vessels and trawler waste.

Being a resident and charter business in Haines I am primarily focused on the Chilkat King run.

ADF&G has devised and enacted many regulations to help conserve the run. Since 2017 there has been a ZERO RETENTION policy King Salmon in the Upper Lynn Canal during the entire summer fishing season.

I speak for myself and many others when I say that this policy has been unfairly heavy handed to the small (less than 4000 people) communities of Skagway and Haines. These communities have suffered severe economic impact as a result. In the past sport anglers have infused millions of dollars into these small communities on an annual basis, via charters, vacation rentals, hotels, car rentals, grocery stores, liquor stores, tackle shops, restaurants, bars, RV site rentals etc., just for the opportunity to try their luck at landing this Trophy.

This policy is based on the fact that the majority of Kings caught in this area are Chilkat Kings.

The ADF&G genetic sampling from 2013 showed that 50 to 60% of Kings caught in Skagway were genetically Chilkat Kings, however many of these fish were from the Pullen creek hatchery in Skagway which were taken from Chilkat King eggs, and were caught within a couple of miles of the Pullen creek fish ladder.

Put another way 40 to 50% were NOT from the Chilkat stock.

As a professional angler I am also aware of the delicate nature of the mighty Chinook and have enacted my own policies to reduce stress and increase the survival rates of a landed fish.

I would like to propose an ammendment to the King Salmon Action Plan that would modify this **inequitable** and **damaging** no retention policy for these 2 communities.

However I and my fellow anglers do feel strongly about the need to protect these fish through smart policies and regulations .

To that effect I would propose the following policies which have been extensively researched and shown to have significant positive effects on fish survival rates:

Continue to allow NO King Salmon fishing in the Chilkat Inlet which is a vast and direct staging area for returning spawners.

Require all sport AND commercial fishermen to use **barbless** hooks, the benefits of which are well documented.

Require sport anglers to use **Small** barbless hooks which are gentle on undersize and bycatch fish.

Require all sport anglers to use rubber nets to land King Salmon which greatly reduces descaling.

Increase the size limit to 30 + inches



Open King Salmon to retention for sport fish in July thus ensuring a large percentage of spawners have reached the spawning waters.

Set annual bag limit for all of Southeast Alaska to 1 or 2 fish.

Require all landed fish on guided tours to be handled by guides until a fish is determined to be legal for retention.

Provide education so that all sport and personal use anglers are aware of these practices to increase survival rates of undersized fish.

It is my honest and humble opinion that some or all of these policy changes will help achieve the conservation goals set forth by ADF&G while correcting the unfair and economically damaging policies that have cost millions in lost revenue in these small communities.

I would like to thank the Members for your consideration of this matter.

Submitted By
Brock Walstad
Submitted On
2/16/2022 7:22:36 AM
Affiliation



PC386
1 of 1

To whom it may concern:

Now is not the time for any liberalizations in harvest. Stronger, more sustained numbers of king salmon passage are required before making adjustments to the fishery based on targetting other species. Unfortunately, king salmon fishery pressure has disproportionately impacted king salmon numbers, and due to the indiscriminant nature of nets, we cannot isolate the harvest of other species without adversely affecting potential king salmon passage.

Thank you for your time.



Submitted By
Bruce Marifern
Submitted On
2/22/2022 9:51:44 AM
Affiliation
Harvester

Phone
9075181113

Email
fishfern@gci.net

Address
P.O. Box 917. Petersburg AK 99833
814 Sandybeach
Petersburg , Alaska 99833

To the Board

Thank you for the opportunity to comment My name is Bruce Marifern,, I was born and raised in Petersburg Alaska. I've been participating in Sitka sac roe for the last forty years, as crew ,, and more recently as a harvester over the last 20 years.

I would like to express my opposition to proposals 156,157,158. As well as Equal split proposals 163 and 164.

I would like to offer Support for proposals 159,160.161 as well as 233.

I am of the humble opinion that Alaska dept of fish and game have been good stewards, and should be allowed to continue to manage as they so professionally do

This is an important resource for our small family operation,, and our local crew

Thank you for your consideration

Sincerely Bruce Marifern

Submitted By
Cale LaDuke
Submitted On
2/23/2022 3:16:54 PM
Affiliation
Commercial fishermen



PC388
1 of 1

Hello to the Board,

My name is Cale LaDuke, I am a life long Alaskan, I live in Sitka, I was born here 40 years ago and plan on living here for the remainder. I troll for salmon and work on a boat that long lines for halibut and black cod.

As a fisherman I realize that quotas go up and down according to biomass and I'm fine with that. However I'm not ok with losing quota or fish due to reallocation to the charter fleet.

With that said I would like to state for the record that I strongly oppose proposal 83, or any proposals to reallocate fish away from the commercial sector. I would also like to support proposal 89, or at least have further consideration on the matter.

Thank you for the opportunity to comment.

Cale LaDuke

Submitted By
Caroline Daws
Submitted On
2/19/2022 10:07:15 AM
Affiliation



PC389
1 of 1

Dear Board of Fish,

I am writing to express my support for the proposals 156, 157, and 158 which protect the herring fishery for subsistence use and to express my opposition to proposals 159, 160, 161, 163, 164, and 165 which would have long term negative effects on the herring populations and which disregard and disrespect both the traditional and contemporary Tlingit knowledge of the sustainable use of this fishery. Proposals 156, 157, and 158 center on evidence-based ways to protect the resilience of this critical fishery for the traditional cultural and subsistence use of Tlingit peoples. Proposals 159 - 165 prioritize profit over the health of these ecosystems and leave Sitka herring populations vulnerable to collapse. As a PhD candidate in Ecology, I support proposals 156, 157, and 159 which are supported by both traditional knowledge and also modern scientific studies of fishery management strategies. I support the leadership of the Herring Protectors, whose knowledge should be valued and respected in Southeast as we seek to uplift the traditional and modern wisdom of Tlingit peoples in Southeast.

Best,

Caroline

Submitted By
Carolyn Nichols
Submitted On
1/26/2022 4:41:34 PM
Affiliation
Self



PC390
1 of 2

PROPOSAL 83

I am totally against proposal 83. This is a reallocation of king salmon away from the trollers to the sport charter. Low abundance years, as we have had recently and look to have in the near future, are hard on everyone and we all need to share in conservation. Taking fish from the trollers to give the charters more in low abundance years is just plain wrong and if there are enough low abundance years in a row the charters would owe the trollers way more than they would ever get made to pay back . I say no on 83

Submitted By
Carolyn Nichols
Submitted On
2/22/2022 7:34:39 PM
Affiliation
Self



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tTo The Board of Fish

Proposal 225

I do not see the need for this change. There has been a dramatic increase in charter harvest of sablefish. In asking for more lenient bag and annual limits the charter fleet is asking for reallocation of sablefish to what is a primarily non resident charter client. At what point will the board of fish send this charter fleet the message that "sport " fishing is different than"meat " fishing. At what point will the charter fleet be held accountable for their increases . At what point will the charter fleet share in the burdens of conservation This proposal claims it is abundance based but only shows how to increase the charter harvest

Please reject this proposal

Thank you

Submitted By
Cassidy Lindow
Submitted On
2/12/2022 9:09:57 PM
Affiliation
Angling Unlimited



PC391
1 of 1

Keep the Herring in the water! Passing legislation that further removes them from the ecosystem damages the salmon runs, and therefore the tourism dollars brought into Sitka's economy each season; but it is also harmful to the wildlife who depend on the herring as a food source. Tribes all across AK still utilize Herring eggs for trade as well. Removing the herring could be catastrophic to Sitka's natural, cultural, and economic worlds.

Submitted By
Catherine sopow
Submitted On
1/13/2022 10:30:29 AM
Affiliation



PC392
1 of 1

Please stop commercially harvest herring sacroe



Comments to Alaska Board of Fisheries on Proposals 161, 160, 159 and 156

Central Council of Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) is writing in opposition to proposals 161, 160 and 159, and in support of Proposal 156, all of which will be considered by the Board of Fisheries at its Southeast Meeting in Anchorage beginning on March 10. These proposals would impact Sitka Sound herring and opportunities for subsistence harvest of herring eggs, which are issues of great importance to our ways of life as Tlingit and Haida people.

Tlingit and Haida people historically harvested herring eggs – a culturally and nutritionally important food – in Sitka as well as other areas in Southeast. But due to historic herring reduction fisheries and more recent poor management of commercial sac roe herring fisheries, Sitka Sound is now the only reliable source for herring egg in Alaska. Our people now rely on the subsistence harvest of herring eggs in Sitka Sound to meet their needs.

We oppose Proposal 161, which would require individual permits for subsistence harvest of herring eggs. Since time immemorial, our traditional harvest of herring eggs has been a collective rather than an individual activity. We strongly object to the individual permit requirement because permits are inconsistent with our culture and values. Second, an individual permit requirement could make it very difficult for our people to obtain herring eggs. Finally, individual permits are completely unnecessary, as fishery managers already obtain good and reliable data on the subsistence harvest through collaboration with the Sitka Tribe of Alaska.

We oppose Proposal 160, which would repeal part of the area in Sitka Sound that is currently closed to the commercial sac roe herring fishery because it would reduce opportunities for subsistence harvesters. The Closed Area is the most important area for subsistence herring egg harvest; this area provides eggs for people throughout Alaska. Our people have already lost opportunities for harvest of our traditional food close to home. There is no justification for reducing the small area of the entire region reserved for subsistence harvest simply to increase access for the commercial sac roe herring fleet.

We oppose Proposal 159, which would repeal 5 AAC 27.195. This regulation resulted from a compromise negotiated by the Board of Fisheries in 2002 among the Sitka Tribe of Alaska, ADF&G, and the commercial sac roe herring industry to ensure adequate opportunities for subsistence harvesters. The industry proposes to repeal it because it requires ADF&G to use in-season management authority over commercial fishers to ensure opportunities for subsistence harvesters. The Alaska Constitution has a priority for subsistence harvest of our natural resources and 5 AAC 27.195 makes that right meaningful for herring. Commercial fishing has already eliminated traditional opportunities for subsistence harvest in areas more accessible. 5 AAC 27.195 now protects the ability of our people to access a share of the remaining herring harvest in Sitka Sound.

Finally, **we support Proposal 156**, which would moderately reduce the commercial sac roe herring harvest rate in Sitka Sound in seasons where the forecasted herring biomass is less than 120,000 tons. Our people have suffered loss of their ability to harvest herring eggs close to home due to insufficiently conservative management of fisheries. Conservative management of the strongest remaining population of herring left in Southeast Alaska is common sense, and consistent with our values.

Submitted By
Chris Hanson
Submitted On
2/21/2022 4:43:13 PM
Affiliation



PC394
1 of 1

I am writing to strongly oppose the proposal to transfer halibut quota to the charter fleet in low abundance years. I recently purchased a small block of halibut quota, and making money on that is a stretch to begin with. How can it be justified that in low abundance years I will be asked give up access to the catch shares I am paying for so that the charter fleet doesn't suffer? It is basically like stealing from me - I have a very expensive loan out on this quota, and did so based on an understanding that on low abundance years I will be tightening my belt to make ends meet. No where along the line did anybody ever come to me and say "Hey Chris, when things get tough abundance-wise, we'll go ahead and share our quota with you to help cover your costs." The bank isn't giving me a break on the payment or the interest rate, either.

It is offensive to me that the charter fleet feels so entitled to access to the pounds that I paid for. The rationalization of the quota system provided for everybody that was entitled to the shares at the beginning, and I wasn't one of them. So I bought in at great expense to myself as an investment in my future. How can it possibly be justified that my investment is to be devalued so that another non-invested user can make money off of my investment?

This is basically stealing, and I challenge the board to find a real, non-politically motivated justification for taking from my family to give to another.



From: [Chris Hashiguchi](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Proposal 82
Date: Wednesday, February 23, 2022 11:56:07 AM

Board Of Fish,

I am an owner operator of a Charter Boat out of Sitka. I have been operating in Sitka since 1995 and own a house in town and have a wife and two girls in Kindergarten and First grade. My clients support Sitka businesses from the time they book there trip to the time they hopefully rebook for the next year. Whether its Alaska Airlines, The Westmark, Orion Sporting goods, Delta Western, The Channel Club or Sitka Sound Seafoods they arrive for there vacation ready to spend money, and they are happy to do it for there opportunity to catch a Alaskan King Salmon.

My business and clientele have been able to adapt to all the of the changes that have happened in the last 27 seasons that I have operated in Southeast. The draconian hard line cuts that will occur if you adopt a plan that only allows one king annually after June 16th will be terrible. When the abundance is low which has been half the time in the last 10 years all sectors have taken a haircut. Or a buzz cut I should say. But under proposal 82 the cuts would be so deep that we will have no head to cut the hair from.

I would support a plan that would allow us to function under the low index number with a three fish annual program through the end of June then cuts from there. We in turn would not be allowed more than a three fish annual in years with higher abundance. Our businesses need continuity and stability to be able to market to our clients. I have had more turn over in my clients in the last 5 years due to changes in limits than anytime in the past. The number one gripe I hear, is how can they change the limits within a week of our trip? The guests want to know what they are paying for and receive the treatment and trip we are selling them.

Thanks for your time,

Christopher W. Hashiguchi
Owner, Legasea Fishing Charters
Sitka AK

Sent from [Mail](#) for Windows



Submitted By
David W Kreiss-Tomkins
Submitted On
2/14/2022 1:57:16 PM
Affiliation

Phone
9077385883

Email
d_kreiss-tomkins@riseup.net

Address
313 Islander Dr.
Sitka, Alaska 99835

Dear Board of Fish committee members,

I'm writing to you in support of the Sitka Tribe of Alaska's herring proposals, especially those that would reduce the catch taken of mature herring. Herring is a forage fish as well as a species on which Tlingit and other Native peoples in Alaska and the Pacific Northwest rely for food and eggs. Both of these conditions require that we manage the fishery in the most conservative manner possible. Given the historical accounts of herring spawn throughout Southeast Alaska, we know that the vast majority of herring stocks here have crashed, and we also know that none of them have returned to anywhere close to their original levels.

I have grown up in Sitka, and remember there being enough herring thirty years ago to pick live herring up off the beaches on a falling tide. It was heartening this year to see the herring return to the harbors and watch kids jigging for them off the docks, as I remember doing when I was younger. It is not out of the question to tie the return of herring to the harbors to the fact that there was no commercial sac roe fishery the last two years. If the sac roe fishery remains closed or is much more severely restricted than it has been, I suspect that the herring may have a chance to return to a trajectory approaching historic levels. Because of that, I support the closure of the sac roe fishery. Barring that, however, please consider restricting the fishery as proposed by the Sitka Tribe of Alaska Resource Protection Department. Thank you for your time and consideration.

Submitted By
Debra Page
Submitted On
2/22/2022 5:40:33 PM
Affiliation



PC397
1 of 1

Writing in opposition to proposals #83 & #88. Please no more cuts to the Troller's King Salmon quota. I've been trolling out of Elfin Cove for 45 years.



Submitted By
Dennis Watson
Submitted On
2/23/2022 11:03:36 AM
Affiliation
commercial salmon troller

Phone
907-617-2800
Email
dwatson@aptalaska.net
Address
PO Box 134
Craig, Alaska 99921

I oppose proposals, 101, 102 and 103. Southeast Alaskan salmon hatcheries are a tremendous asset to the regions, commercial, sport and food fisheries. They are also a major contributor to Southeast's economy by helping to stabilize commercial salmon fishery income. Hatchery produced salmon help level out the good year bad year scenario that is so often apart of our fishery. ADFandG already monitors hatchery compliance. As well, there is a Department program that is designed to research and collect data on hatchery impacts on wild stocks and the marine environment. There is no reason to entertain proposals by a special interest group to do what is already being done.



From: [Doretha Walker](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Proposal 161
Date: Sunday, February 20, 2022 12:42:14 PM

Proposal 161 creates significant barriers for Alaska Native communities to continue traditional ways of life.

The Sitka subsistence harvest is not just a gathering exercise; it is, in and of itself, an important cultural event.

I vehemently oppose passage of Proposal 161.

Sincerely,

Doretha B Walker

[Sent from Yahoo Mail on Android](#)



Submitted By
Paul Cyr
Submitted On
2/22/2022 4:53:18 PM
Affiliation
EC Phillips & Son, Inc

Board of Fish
Alaska Department of Fish & Game

February 21, 2022

Subject: OPPOSE- Board of Fish Proposals 156, 157, & 158; Support Proposals 159, 160, 161

We oppose proposals 156, 157, & 158 on the grounds that the current harvest rule and ADF&G management does not need to change. Furthermore, the Sitka Sound herring stock is at an all-time high biomass. The areas closed to commercial harvest are more than adequate to provide a reason subsistence opportunity.

Over the years ADF&G and the commercial herring fleet have made significant changes to the fishery in order to address concerns raised by the Sitka Tribe. This includes funding the harvesting and transport of roe on branches from the harvest grounds. ADF&G and the commercial herring fleet have been providing the Sitka Tribe with crucial information regarding herring distribution, location, and spawning activities. In 2018, historical fishing grounds were closed to commercial harvest to also address the Sitka Tribe concerns.

The fishery is heavily supported by a science-based fishery management process to promote a sustainable biomass of herring with a conservatively managed fishery. This is important to the Sitka Tribes subsistence goals as well as sustainability of the fishery. It is our belief that the Sitka Sac Roe Herring Management is the "Gold Standard" for herring management in Alaska and possibly throughout the world.

ADF&G Sac Roe Herring data clearly indicates that herring populations have increased significantly since the start of the commercial fishery in the 1970s and especially following the closure of the pulp mill in 1993. Natural fluctuations in biomass and spawning behavior do not indicate a collapse in stocks, all species are cyclical in nature, good return years with not so good return years for unknown reasons. We oppose proposals 156, 157, & 158 that would modify the commercial sac roe herring fishery for any reason that is not supported by science-based fishery management.

If there are any questions regarding our position on this issue, please do not hesitate to contact us.

Regards,
E.C. Phillips & Son Inc.
907-247-7975