

Submitted by: Chris Combs

Community of Residence: SITKA

I operate a small troller out of Sitka.

I strongly support proposals 109, 110, 112.

I strongly oppose proposals 108 and 113.

Beside king salmon, I depend on the chum salmon fishery near town and therefore oppose any arbitrary decrease in chum salmon hatchery production.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Commercial Fisheries Entry Commission
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To: Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries

Date: January 14, 2025

Thru: Glenn Haight, Chair
Rick Green, Commissioner
Commercial Fisheries Entry Commission

Subject: CFEC Comments on
Proposal 227

From: Reid Johnson, Research Section Lead
Commercial Fisheries Entry Commission

Proposal 227 requests that the board of fisheries (the board) allow dual permit operations in the Southeast shrimp pot fishery (permit P91A). Dual permit operations involve two permit holders collaborating on a single vessel to harvest fishery resources. This arrangement allows permit holders to share vessel-related costs, such as insurance and maintenance, reduce crew expenses, and benefit from additional gear allowances granted at the board's discretion. Proposal 227 appears to use the terms "stacked" and "dual" interchangeably. For the sake of clarity: stacked permit operations are defined as one individual owning two permits and fishing an additional compliment of gear, while dual permit operations are defined as two individuals fishing from the same vessel and operating an additional compliment of gear. We believe it is the intent of the proposer that the board consider dual permit operations, as stacked permit operations would require legislative change to be implemented in shrimp fisheries.

CFEC monitors permit prices, earnings, and permit holder demographics across the state of Alaska in dozens of limited entry fisheries. We have noted certain commonalities in how the metrics we track change when dual permit operations are allowed:

1. **Increase in Permit Prices**

Limited entry permits are a unique when it comes to how they are traded. The supply of limited entry permits is strictly limited, permits cannot increase or decrease. When supply of an item is strictly limited, changes in demand directly influence price, and demand is expected to increase if dual permit operations are allowed. The most recent example of this occurrence is the Prince William Sound salmon seine fishery, when the board allowed dual permit operations starting in 2022, permit prices jumped by roughly \$75,000 over the next year.

2. **Latent Permits and Price Buffering**

Price spikes caused by increases in demand are often buffered when many latent permits exist in a fishery. The Southeast shrimp pot fishery has a substantial number of latent permits—permits held by individuals who choose not to fish. When dual permit regulations are enacted, latent permit holders often sell their permits to active participants, increasing the number of permits fished. This latent supply serves as a buffer, mitigating the potential price spikes caused by heightened demand. In 2023, a total of 128 Southeast shrimp pot permits were latent, or

56 percent of the 228 permits available. Permit latency has been remarkably constant over the last 10 years, averaging 59 percent. Having such a large proportion of P91A permits latent will greatly mitigate any permit price increase.

3. Increases in Earnings

Dual permit operations on average earn more than single permit operations to a degree that outstrips the additional allotment of gear. For 2022 and 2023 in the Prince William Sound salmon seine fishery, the value per landing for a dual permit operation was 52 and 56 percent more, respectively. Dual permit operations were only given an additional 25 fathom compliment of gear, 250 fathoms instead of 225 fathoms, an 11 percent increase in net length. It remains to be seen if harvest efficiency in a pot fishery will increase in a similar manner. This increase in harvest efficiency likely has more to do with the effort put forth by individuals involved in a dual permit operation, not the amount of gear in the water.

4. New Entrants

Dual permit operations lower barriers to entry for commercial fishing. By enabling individuals to fish under a dual permit arrangement, prospective entrants could avoid the significant costs of purchasing or financing both a vessel and gear. Instead, an individual could purchase only a permit and then negotiate cost-sharing agreements with an existing vessel owner with a permit. While increased participation raises demand and permit prices, dual permit operations would still reduce the total cost of entry.

In summary, the large number of latent permits in this fishery will work to mitigate permit price increases if dual permit operations are allowed. We will also see in the years immediately following dual permit operation regulation passage, many new and younger entrants in the fishery.

Finally, we must emphasize that the financial performance of the fishery will remain the primary driver of permit prices, as it should be. While dual permit regulations do increase permit prices, their impact is relatively minor compared to the significant upswing in permit prices during years when the fishery performs well, or the corresponding decline in permit prices when the fishery performs poorly.

If you have any questions or for further clarification, please contact us at your convenience: reid.johnson@alaska.gov, (907) 717-6512.



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To: Märit Carlson-Van Dort, Chair
 Alaska Board of Fisheries

Date: January 14, 2025

Thru: Glenn Haight, Chair
 Rick Green, Commissioner
 Commercial Fisheries Entry Commission

Subject: CFEC Comments on
 Proposal 182

From: Reid Johnson, Research Section Lead
 Commercial Fisheries Entry Commission

The Commercial Fisheries Entry Commission (CFEC, Commission) has reviewed Proposal 182 which seeks to modify the management plan for herring sac roe purse seine (G01A) permit holders in the Sitka Sound fishery, allowing them to use open pounds instead of traditional purse seine gear in sections 13-A and 13-B. It was suggested that this would increase the value of the product and provide more options to fishermen in years when they would otherwise be unable to fish.

The Commission understands that declining sac roe prices have made it more difficult for fishermen to make a living, and we support any efforts to improve the economic situation of permit holders. Nonetheless, CFEC may only act after the Board of Fisheries (board) has voted on whether to redefine the G01A fishery. Similar proposals have been brought before the board many times going back as far as 1998 and the CFEC has worked to find a solution in line with the Limited Entry Act and the State Constitution. CFEC has maintained that any board decisions on this matter should carefully consider the desires of existing Sitka Sound herring user groups, and that subsequent CFEC decisions would be guided by public comment and the Limited Entry Act.

CFEC works to permit the fisheries that the board defines. If the board wishes to redefine the Sitka Sound sac roe fishery (G01A permit), we recommend that the board take explicit action to do so and vote proposal 182 up or down. Proposal 182 includes a management plan; a board approved management plan would give CFEC a clearly defined set of regulations by which to evaluate if allowing G01A permit holders to fish in Sitka Sound for sac roe in pound gear would be a violation of limited entry.

CFEC defines fisheries by gear type, area, and fisheries resource code. A spawn on kelp limited entry fisheries already exists in Northern Southeast Alaska that makes use of a pound as a gear type, the L21A permit type. Area 13-A and 13-B are not areas in which commercial spawn on kelp pound fisheries have taken place, although they are part of the Northern Southeast area.

Proposal History

At the 2022 Southeast and Yakutat Finfish and Shellfish previous CFEC commissioners provided a historical perspective regarding similar proposals that desired to open Sitka Sound to spawn on kelp commercial harvest¹. We draw upon this perspective for a brief discussion on the history of this and previous similar proposals. CFEC limited the Southeast Roe Herring Purse Seine (G01A) fishery in 1977 and in 1992 determined the optimum number of permits to be 46². Currently, there are 47 active G01A permits. Southeast Alaska spawn-on-kelp fisheries were created by the Board of Fisheries (BOF) in 1989³, and limited in 1995⁴. The Northern Southeast pound fishery (L21A) currently has 111 permits from 112 initially issued.

Efforts to expand Sitka Sound fisheries have been ongoing since at least 1998 with Proposal 441 suggesting the use of open pounds by sac roe purse seine permit holders. At the time, the Board took no action on the proposal but tasked ADFG with conducting an experimental fishery to study the economic merits of open pounding. Similar proposals and ACRs were brought before the Board of Fish (BOF) in 2000, 2003, 2016, 2019 and 2022.

In 2015, the Commission held a public hearing on proposed regulations that would exclude Sitka Sound from the Northern Southeast spawn-on-kelp pound fishery administrative area, effectively a first step toward allowing open pounds in Sitka Sound. Public comments were overwhelmingly in opposition of this regulation change, and CFEC took no action.⁵

Outside of the board cycle, CFEC has also been petitioned to consider a new resource code for “kelp with herring spawn” which would be separate from “spawn on kelp herring roe”. CFEC found no arguments convincing that kelp with herring spawn is a separate resource from spawn on kelp herring roe.

Department of Law Opinion

Alaska’s Department of Law has provided legal opinions over the years consistently advising that allowing seine boats to participate in the pound fishery would likely violate the Limited Entry Act. In 2015, the assistant attorney general advised that the pound permit holders are the only individuals who can participate in the pound fishery and that “the board likely does not have authority to allow additional users into this limited entry fishery without prior action by the Commercial Fisheries Entry Commission.” The Department of Law later stated that regulatory proceedings would likely be

¹ [Select Southeast Alaska Herring Fisheries Limited Entry and the proposed Open Pound Alternative for Sitka Sound Roe Herring Purse Seine Fishery](#)

² [Schelle, K., B. Muse, and K. Iverson. 1992. Southeastern Alaska Roe Herring Purse Seine Fishery - Optimum Number Report. CFEC Report 92-2.](#)

³ Northern Southeast Herring Spawn-on-Kelp Pound Fishery Rationale, CFEC, May 25, 1999

⁴ 20 AAC 05.310 (g) (1) and 20 AAC 05.310 (g) (2)

⁵ [CFEC Hearing Record, November 6, 2015](#)

necessary in instances where the board authorizes “additional fishing opportunities for permit holders in overlapping administrative areas”⁶.

Conclusion

Regulatory proposals such as proposal 182 that alter the allowed gear for an existing limited entry permit would require that CFEC change its regulations. CFEC would effectively view the passage of this proposal as a petition by the board to examine the issue and engage in a regulatory change process, which would involve requesting stakeholder input. This regulatory change process would involve gathering public input, as well as thoroughly examining both the purse seine (G01A) and pound (L21A) fishery.

Because a limited entry permit already exists for people to fish for herring roe using pounds in Northern Southeast (L21A), allowing seiners to utilize pounds may run afoul of the Limited Entry Act's purpose of “controlling entry of participants into the commercial fisheries in the public interest and without unjust discrimination”⁷. Effectively, adding new participants with the same gear type as the existing pound fishery effectively increases the number of participants in a limited entry fishery.

It may be possible to separate the Sitka Sound area from the L21A administrative area, as previously proposed in 2015. However, public sentiment was strongly opposed to that change in 2015. CFEC does not know if sentiment has shifted, and we will not investigate unless Proposal 182 is passed.

If you have any questions or for further clarification, please contact the CFEC research section at your convenience: reid.johnson@alaska.gov, (907) 717-6512.

⁶ [Department of Law comments on proposals for the January 4 - 15 Board of Fisheries meeting for Southeast Alaska and Yakutat](#)

⁷ AS 16.43.010

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

As a lifelong Alaskan commercial fisherman, captain and owner of a family-operated fishing operations in SE and Bristol Bay, former Marine who served during the Global War on Terror, and 100% disabled combat veteran, I am writing to express my strong opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska.

I've spent my life working on the water, investing in this industry that is not just a job but the backbone of many coastal communities in Alaska. Over the years, I have seen firsthand how regulation changes, like the redistribution of halibut quotas, have decimated fishing families and left entire communities struggling. Now, with the potential of a 25% cut in hatchery production, I fear we are once again targeting the wrong solution to an incredibly complex issue.

Hatcheries are not merely a tool for boosting salmon stocks; they are a lifeline for Alaska's economy and coastal communities. They generate \$576 million in annual economic output and provide the equivalent of 4,200 jobs statewide. This economic impact ripples far beyond fishermen—it affects processors, local businesses, and even municipal revenues in Southeast Alaska, where every dollar is critical to communities facing one of the highest costs of living in the United States.

For coastal Alaskans, particularly indigenous peoples, commercial fishing is more than an industry—it is a way of life. It is one of the last remaining pillars supporting families in a state where options for economic sustainability are increasingly limited. A 25% reduction in hatchery production would hit these communities hardest, leading to lost jobs, decreased tax revenues, and diminished opportunities for future generations to participate in this proud tradition.

It is deeply troubling that, once again, the commercial fishing industry is being asked to bear the brunt of regulatory cuts while other user groups, like sport and charter fisheries, are often shielded from similar sacrifices. Hatchery programs ensure that salmon stocks are available to all Alaskans—commercial, sport, subsistence, and personal-use fishermen alike. Without hatchery supplementation, wild stocks would be placed under increased pressure, particularly in years of low abundance.

Hatchery programs are managed responsibly under the rigorous oversight of the Alaska Department of Fish and Game, employing sound scientific practices that ensure hatchery fish complement wild stocks rather than harm them. Alaska's salmon fisheries, including hatchery-origin fish, have long been certified as sustainable by the Marine Stewardship Council

and Responsible Fisheries Management. These programs are a testament to Alaska's commitment to sustainability and responsible resource management.

Economic and Environmental Impacts of Proposal 156: Adopting Proposal 156 would have catastrophic consequences at a time when salmon-dependent communities can least afford it. Reducing hatchery egg take levels by 25% would significantly harm fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken hatcheries' ability to support wild stocks by alleviating harvest pressure from user groups.

Furthermore, the scientific data regarding hatchery impacts on wild salmon populations is inconclusive and does not justify such drastic cuts. For 50 years, Alaska's hatchery programs have supported sustainable fisheries management and stabilized local economies. These programs provide salmon not just for today but for generations to come, and Proposal 156 risks undermining this legacy.

As someone who has sacrificed deeply for this nation and this state, I ask you to consider the profound consequences of this proposal. I have seen what happens when regulations cripple an industry—the loss ripples far beyond the individual fishermen. Families are forced to leave the communities they've lived in for generations, businesses close their doors, and the cultural fabric of Alaska is weakened.

I urge you to reject Proposal 156. Instead, let us continue to support hatcheries as a vital part of Alaska's economic and cultural identity. These programs represent not only a sustainable resource but a commitment to the people of Alaska who depend on them to survive.

Thank you for your time and thoughtful consideration of this matter.

Respectfully,

Dustin Connor, USMC disabled combat veteran
Petersburg, Alaska



Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Tori Connor, and I am a 34-year-old third-generation commercial fisherman from Petersburg, Alaska. I operate my family's salmon seine vessel, a business that has sustained not only my family—my parents, husband, and child—but also the families of the four crew members I employ, all of whom are locals from our town. Our livelihood, and the livelihoods of so many in our community, rely directly on the strong salmon returns supported by hatcheries. In addition to commercial fishing, I depend on subsistence salmon to feed my family through the winter. Since the Thomas Bay net pens were established, I have seen a remarkable improvement in local salmon returns. Streams that once struggled now flourish, providing a critical food source for my family and many others in the community. This firsthand experience underscores the importance of hatchery programs in supporting both subsistence and commercial fisheries.

Proposal 156, which seeks to reduce Southeast Alaska hatchery-permitted pink and chum salmon egg takes by 25%, would have devastating consequences for fishermen like me. Hatcheries contribute significantly to Alaska's salmon harvests, with an average of 170 million pounds of salmon produced annually, generating \$102 million in ex-vessel value. These fish account for 16% of the total statewide salmon harvest value, supporting thousands of fishing families, processors, and related businesses. A reduction in hatchery output would ripple through the entire community, threatening jobs, income, and food security. Hatcheries also play an essential role in subsistence fishing, which is crucial for families like mine. Every year, hatchery-raised salmon contribute to the 162,000 fish harvested for personal use across Alaska. Without hatchery support, access to subsistence salmon would be significantly reduced, leaving families struggling to meet their food needs during the long winter months.

As someone who has witnessed the benefits of hatchery programs, I can confidently say they are managed responsibly and sustainably. Alaska's hatchery operations are carefully designed to supplement wild stocks without harming them. Broodstock is selected to maintain genetic diversity, and advanced technologies like otolith marking and coded wire tagging ensure rigorous monitoring of hatchery impacts. In key regions such as Prince William Sound and Southeast Alaska, wild stocks remain healthy, with no salmon populations listed as "stocks of concern."

While the proponents of Proposal 156 argue that hatcheries contribute to competition for food in the ocean, there is no conclusive evidence linking hatchery production to declines in wild salmon stocks. In fact, factors such as climate change, bycatch, and habitat degradation are far more significant drivers of salmon population challenges. Reducing hatchery production would

do nothing to address these larger issues and would instead weaken the vital infrastructure that supports Alaska's fisheries.

As a third-generation fisherman, I am proud to carry on my family's legacy in Petersburg. Hatcheries have been instrumental in making that possible, ensuring that strong salmon returns sustain our community, both on the water and at home. Proposal 156 threatens that future, undermining decades of progress in fishery management and endangering the livelihoods of hardworking Alaskans.

I urge the Board of Fisheries to reject Proposal 156 and to continue supporting the hatchery programs that are essential to the resilience and sustainability of Alaska's fisheries, economy, and communities.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery's impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

Sincerely,

Tori Connor
Petersburg, Alaska



PC105

Submitted by: William Connor
Community of Residence: Petersburg, Alaska

Opposition to Proposal 156

PC105

Submitted by: William Connor
Community of Residence: Petersburg

194 oppose - escape rings are to large. I have a market that prefers a smaller fish 2 to 4 pound fish.

195 support - the live market and the close proximity to the airport in Ketchikan will expand my ability to market Clarence fish for a much longer period of the year. With the price from processors today and the economics the longer season allows options.

196 support this is the right escapement size.

198 oppose - 4 fish a day is more than a family of 6 can eat a day.

PC105

Submitted by: William Connor
Community of Residence: Petersburg

I SUPPORT 195

Being that the sablefish market is flooded with product and is hard to sell at a profit moving the southern southeast (Clarence) sablefish season to an opening that coincides with the federal season would allow local fishermen the opportunity to sell the fish fresh and do more self marketing especially with the availability of air transportation being so close to the fishing grounds.

This would go along with Alaska's mandate of making the commercial fisheries more profitable.

Bill Connor

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Connor of Petersburg, Alaska. I am a commercial and personal use fisherman.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

I would like the board to leave the 25% egg take reduction in the trash. I started salmon seining in 1975 and remember the days of no hatchery production. When the hatcheries were put online and started to contribute to the commercial catch it was a boom to the economies of southeast Alaska. Our fishing season went from late July fisheries to early June fisheries. This extended the fishing season by almost 2 months. My family and the families of the 4 crew I hire began to feel more stable in their annual income, so they bought houses and the local business expanded because of the extra income produced by the hatcheries and income generated from their production.

Do you want to see the results of this economic benefit fail? Well, reducing the production of the hatcheries is the perfect way to do this. I urge the Board to vote NO on any reduction of egg take.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than

harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

William Connor
Petersburg, Alaska



Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ryan Cook of Haines, Alaska. I participate in Alaska's salmon fisheries as a commercial, subsistence, personal use, and sports fisherman.

I strongly oppose Proposal 156! This proposal would devastate the Haines Gillnet fleet. I was born and raised in Haines and have made it my home for the past 47 years. I have owned and operated my own gillnet boat for the past 18 years! The hatchery chum salmon that DIPAC produces is what has kept the district 15 gillnet fishery alive since I started fishing. Being able to fish on these hatchery fish takes a lot of pressure off of the wild salmon runs that go up the Chilkat and Chilkoot rivers.


DIPAC has stated that a 25% reduction would send them into a downward spiral that would most likely have them shutting down in 10 years or less. We can not afford to lose any of these fish! The trickle-down effect from this would not just hurt the fishermen but also the canneries & their workers and also all SE communities from the loss of the raw fish tax money that they receive every year!

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Ryan Cook
Haines, Alaska



Submitted by: Sheridan Cook
Community of Residence: Juneau, AK

Hello,

I support Proposals 173 - 179, 181, 188, 189, and 190 because they aim to establish caps and support co-management frameworks that recognize Tribal sovereignty.

I recommend that the board of Fish select the elements of proposals 173-177 because they may provide the greatest protection to spawning herring by increasing a maximum cap on the commercial sac roe herring fishery.

I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

I strongly support proposal 190, recognizing tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework.

The herring are already being overfished by commercial fishermen and many of the runs in Southeast Alaska have already completely disappeared. The herring need to be protected, and our oceans need to be stewarded by Indigenous people to ensure that the herring keep returning to us each year. The herring feed our oceans and in turn feed us, feed our other land relatives, and are so incredibly important in our ecosystem.

I oppose Proposals 182 and 183 to expand access of commercial permit holders to herring in Sitka Sound.

By the time my mother had me and my brothers, the herring runs had disappeared here in Juneau. While I would love if our oceans were healthier today, I still consider myself lucky that the herring runs are still in Sitka. In the future, I hope that I can look at the children growing up now, and those that are yet to come and show them that our oceans and our herring are strong and healthy.

Submitted by: Alan Corbett
Community of Residence: Juneau

Dear Members of the Board,

I am writing to express my strong opposition to Proposal 120, which seeks to close the nonresident sport fishery for king salmon on weekends. This proposal is not rooted in sound management practices and ignores the success of existing measures already implemented by the Alaska Department of Fish and Game including the in-season closure in 2024.

Closing the fishery to nonresidents on weekends would have serious economic consequences for Southeast Alaska. Nonresident anglers are a vital part of our region's economy, and weekends are the most important time for charter businesses to accommodate these clients. This proposal would:

- Hurt Charter Businesses: A significant portion of charter bookings occur on weekends. Restricting access during this peak time would result in considerable revenue loss for operators and the businesses that depend on them.
- Impact Local Businesses: Hotels, restaurants, and shops that rely on tourism dollars would also feel the effects of reduced fishing opportunities for nonresidents, further harming our local economy.

This proposal disregards the fact that ADF&G already uses robust, science-based tools to manage king salmon stocks effectively. In 2024, for example, in-season closures and other measures successfully kept the sport fishery within its allocated quota. These strategies are proven, adaptable, and equitable—far more effective than the broad and arbitrary restrictions proposed here.

Additionally, this proposal unfairly singles out nonresident anglers, who represent only a portion of the overall harvest. Closing weekends to nonresidents while allowing residents unrestricted access is both inequitable and ineffective. It fails to address the larger issues impacting king salmon populations, such as habitat loss, ocean conditions, and pressures from other harvest sectors.

It is clear this proposal is less about conservation and more about reallocating king salmon away from the charter fleet and nonresident anglers. This approach unfairly penalizes a specific group without providing a meaningful conservation benefit.

Proposal 120 is not a sound management strategy. It disregards the effectiveness of existing ADF&G tools and places an undue burden on nonresident anglers and the charter fishing industry. I respectfully urge the Alaska Board of Fish to reject this proposal and instead support proven, science-based management practices that are fair and equitable for all stakeholders.

Sincerely,

Alan Corbett

Adventures in Alaska

Juneau, AK

Submitted by: Alan Corbett
Community of Residence: Juneau

Dear Board of Fish members,

I respectfully oppose Proposal 119 to close the nonresident sport fishery for king salmon for two days per week, as it would have significant negative economic impacts on my charter business and the broader local economy, without providing sound evidence that such a measure would be an effective management strategy.

Economic Impacts

The charter fishing industry is a vital economic driver for Southeast Alaska, supporting local jobs, businesses, and tourism. Many nonresident anglers travel specifically to fish for king salmon, and this proposal would substantially reduce their opportunities to do so. By closing the fishery for two days per week, we risk:

- **Loss of Revenue:** Charter businesses like mine depend on consistent bookings. Reduced opportunities for nonresident anglers to target king salmon would result in cancellations, decreased demand, and lower revenues not only for charter operators but also for related businesses, including hotels, restaurants, and local stores.
- **Reduced Tourism Appeal:** King salmon fishing is a marquee attraction for tourists visiting Southeast Alaska. Limiting access will make our region less competitive compared to other destinations, deterring repeat visitors and impacting the broader tourism sector.
- **Job Losses:** Many charter businesses employ local residents during the fishing season. Reduced demand will force businesses to cut jobs or reduce staff hours, further harming local families and communities.

Questionable Management Effectiveness

While the proposal seeks to conserve wild king salmon stocks, it lacks substantive evidence that restricting the nonresident sport fishery for two days per week would significantly benefit king salmon populations.

Key concerns include:

- **Minimal Impact on Escapement:** The nonresident sport fishery represents a small fraction of the overall harvest of king salmon. Restrictions targeting this group are unlikely to meaningfully increase escapement to natal streams when other, larger harvest sectors, such as commercial fisheries, are not subject to equivalent reductions.
- **Selective Restrictions:** Closing the fishery to nonresidents but not residents creates an inequitable management framework that targets a specific group without addressing the broader challenges facing king salmon populations, such as habitat degradation, ocean conditions, and commercial harvest pressures.

-Existing Conservation Measures: The State of Alaska already has robust king salmon conservation measures in place, including seasonal closures, bag limits, and size restrictions, which effectively reduce harvest pressure during times of low abundance. Adding nonresident-specific restrictions introduces unnecessary complexity without clear benefits.

Rather than imposing a blanket closure for nonresident anglers, efforts to conserve king salmon should focus on holistic and science-based solutions, such as:

- Enhancing habitat restoration and rehabilitation projects in natal streams.
- Addressing broader ecosystem issues, including ocean conditions and predation.
- Working collaboratively with all stakeholders, including the commercial fishing sector, to implement equitable and effective conservation measures.

In conclusion Proposal 119 disproportionately targets nonresident anglers and the charter industry while failing to address the root causes of declining king salmon populations. It would harm local businesses, reduce tourism revenue, and provide little demonstrable benefit to king salmon conservation. I urge the Board to reject this proposal and prioritize science-based, equitable management strategies that support both the resource and the communities that depend on it.

Thank you for your consideration.

Sincerely,

Alan Corbett

Adventures in Alaska

Juneau , Alaska

PC108

Submitted by: Alan Corbett

Community of Residence: Juneau

Dear Board Members,

I am the owner-operator of Adventures in Alaska. A single-vessel charter business in Juneau. I am writing to express my opposition to Proposal 156, which seeks to reduce Southeast Alaska hatchery-permitted pink and chum salmon egg take levels by 25%. This proposal could have significant negative economic, social, and conservation impacts on the region.

Economic Impact:

Alaska's salmon hatcheries are a cornerstone of the state's economy, supporting approximately 4,200 annualized jobs and generating \$219 million in labor income. The total economic output connected to hatchery production is about \$576 million annually. In Southeast Alaska alone, hatcheries account for 2,000 jobs, \$90 million in labor income, and \$237 million in total annual output.

Reducing egg take levels by 25% would decrease hatchery production, leading to lower salmon harvests. This reduction would directly impact commercial fishing, processing sectors, and related industries, potentially resulting in job losses and decreased income for thousands of Alaskans who depend on hatchery-produced salmon.

Social Impact:

Salmon fishing is integral to the cultural and social fabric of Southeast Alaska. Hatcheries enhance salmon populations, ensuring consistent availability for commercial, sport, and subsistence fishing. A reduction in hatchery production could lead to decreased salmon availability, affecting food security and traditional practices, particularly in communities that rely heavily on salmon for subsistence.

Local governments have expressed concerns over such reductions. Both the Juneau and Sitka Assemblies have passed resolutions opposing Proposal 156, citing detrimental economic and social impacts.

Conservation Considerations:

Alaska's hatchery programs are designed to supplement wild salmon populations without causing harm. The Alaska Department of Fish and Game implements rigorous permitting processes, genetic stock management, and monitoring to ensure that hatchery operations do not negatively impact wild stocks. Research and monitoring programs are in place to assess interactions between wild and hatchery salmon, with ongoing studies aimed at understanding and mitigating any potential risks.

Reducing hatchery production without conclusive evidence of harm to wild populations could undermine these well-managed programs. It is essential to base such decisions on comprehensive scientific data to avoid unintended consequences that could jeopardize both hatchery and wild salmon stocks.

Proposal 156 poses significant economic and social risks to Southeast Alaska's communities and lacks sufficient scientific justification from a conservation standpoint. I urge the Board of Fisheries to consider these factors and oppose the proposed reduction in hatchery egg take levels.

Sincerely,

Alan Corbett

PC108

Submitted by: Alan Corbett
Community of Residence: Juneau

Dear Board Members,

I am writing to express my opposition to Proposal 115, which seeks to reduce the nonresident annual limit for Chinook salmon to one fish per year. While the conservation of Chinook salmon stocks is vital, this proposal lacks scientific support, fails as a genuine conservation measure, and appears to be a deliberate effort to shift allocation to trollers rather than an attempt to protect the resource.

Southeast Alaska's Chinook salmon management already employs rigorous, science-based restrictions for both residents and nonresidents, including seasonal closures, size limits, and quotas. These measures are designed to ensure sustainability across all user groups, making the proposed reduction for nonresidents unnecessary within the existing management framework.

Conservation measures must be applied equitably across all user groups to address resource challenges effectively. Singling out nonresidents while permitting residents to harvest at higher rates undermines the proposal's stated conservation intent. If conservation were truly the goal, reductions would be applied universally rather than selectively.

I strongly urge the Board of Fish to reject Proposal 115 for the following reasons:

1. The Proposal Is Not Based on Science.

This proposal fails to provide scientific evidence to support the claim that reducing the nonresident limit for Chinook salmon will significantly improve conservation or address perceived issues for resident sport fishers. Existing regulations by the Alaska Department of Fish and Game are already grounded in robust stock assessments and sustainability goals. Targeting nonresidents without clear data undermines these science-based practices.

2. It Does Not Advance Conservation Goals

Rather than focusing on conservation, this proposal aims to shift harvest allocation. Current management ensures that total harvest remains sustainable, irrespective of the angler's residency. Limiting nonresidents further, without addressing total harvest levels, offers no benefit to the resource. Conservation efforts should prioritize broader threats like habitat degradation, climate change, and commercial overfishing, rather than disproportionately targeting recreational anglers.

3. It Seeks to Reallocate Harvest

This proposal transparently seeks to increase the allocation of Chinook salmon to resident anglers and the commercial troll fishery, at the expense of nonresidents. Nonresident anglers contribute significantly to Southeast Alaska's economy through tourism and charter fishing. Penalizing them without evidence of their outsized impact on Chinook stocks is inequitable and unjustified.

4. Charter Fishing Is Already Regulated

The claim that "unregulated charter fishing vessels" are driving declines in availability for residents is misleading. Charter fishing operations are heavily regulated, with reporting requirements, logbooks, and limits on daily and annual harvests. Further restricting nonresident anglers will harm charter operators and tourism-dependent businesses without addressing any genuine conservation concerns.

5. Negative Economic Impacts

Reducing the nonresident annual limit to one fish would deter fishing tourism, leading to significant economic losses for Southeast Alaska communities reliant on these visitors. Conservation policies must balance resource protection with the economic needs of local communities.

In conclusion, Proposal 115 lacks scientific merit, fails to achieve genuine conservation, and prioritizes reallocating harvest over sound resource management. I respectfully request that the Board reject this proposal and continue to base management decisions on scientific evidence, fairness among user groups, and the broader interests of Alaska.

Respectfully,
Alan Corbett

PC109

Submitted by: Chris Cornwell
Community of Residence: Bainbridge Island, WA

I oppose Proposition 156

PC110

Submitted by: Cody Cowan
Community of Residence: Ketchikan, AK

Proposal-105 (OPPOSE)

This proposal is a “quick grab” for non-resident targeting businesses and non-resident fisherman looking for increased daily bag limits or annual limits targeting Southeast Chinook salmon. This proposal will further reduce the proportion of Southeast resident fisheries derived from the Pacific Salmon Treaty.

Proposal-106 (SUPPORT)

This proposal helps protect the Pacific Salmon Treaty proportion for Southeast resident fisheries from large offshore Chinook targeting charter operations who are actively looking to expand their businesses into Southeast Alaska.

Proposal-107 (SUPPORT)

This proposal is similar to proposal (106) as it goes one step further in protecting Pacific Salmon Treaty allocations for already participating Southeast resident fisheries.

Proposal-108 (OPPOSE)

Resident trollers have lived for decades with an ever-shrinking Treaty allocation and are limited in number by the CFEC. Commercial charter operations catering their business to a non-resident majority needs to adopt more conservation measures to Southeast Chinook salmon. Non-residents should not have preferential access to the resource of Southeast Chinook over residents of the State.

Proposal-109 (OPPOSE)

This proposal does not practice highly needed conservation measures for charter businesses targeting Chinook salmon early in the season (April 1st through June 14th), this will allow the continuation of targeting a large number of wild-stock and stocks of concern Chinook in the Southeast region. This

proposal eradicates the dire need for an equal opportunity fishery for non-resident targeting businesses throughout the entire Southeast region.

Proposal-110 (SUPPORT-AMENDED BY TSI/ATA-RC & KETCHIKAN AC-RC)

This proposal upholds the historic 80/20 split allocation from Treaty between Southeast trollers and the sport fishery. This proposal is the foundation used in creating the TSI/ATA-RC, as well as, the widely supported Ketchikan AC-amended RC.

Proposal-114 (OPPOSE)

This proposal will alter and chance the historic 80/20 split allocation from Treaty between Southeast trollers and the sport fishery.

Proposal-115 (SUPPORT)

This proposal will allow continuous growth for the non-resident targeting charter businesses without harming the resident sport-fish fishery. Without a cap or limited entry on Southeast Chinook targeting business and operations, this proposal is necessary for the longevity to allow residents to harvest Chinook salmon in the future.

Proposal-120 (SUPPORT)

This proposal will help build local Chinook stocks, help resident harvesters in local Southeast communities, and also help keep the non-resident fishery held within their already Pacific Salmon Treaty allocation of 20%.

Proposal-130 (SUPPORT)

This proposal will allow the Southeast resident troll fishery to obtain their full allocation of 80% allocated from the Pacific Salmon Treaty. Over 34,000 Chinook have been robbed from Southeast resident trollers due to overfishing from non-resident targeting businesses just in the past two (2) years. This proposal will stop that from happening while still keeping all steak-holders within their allotted Pacific Salmon Treaty allocations.

Proposal-156 (OPPOSE)

Reducing hatchery production in Southeast Alaska will be devastating to all local communities and local economy's throughout the region. It is crucial that all Southeast salmon fisheries and resident harvesters have a safeguard put in place from their local hatcheries in the production and raising of all salmon to the fullest extent possible.

Proposal-140 (SUPPORT-AMENDED)

This proposal was written for conservation with the intent of a single barbless hook only to be used outside of active hatchery fishing zones in saltwater while targeting Chinook in the "Hook and Release" sport-fishery conducted in Ketchikan, AK (Clover Pass) area, from April 1st through June 14th. I support this proposal to also be used in all areas that currently have fishing restrictions enacted due to Stocks of Concern throughout the Southeast region.

Proposal-141 (SUPPORT-AMENDED)

This proposal was written for conservation with the intent to restrict the use of bait while fishing outside of active hatchery fishing zones in saltwater targeting Chinook salmon during the “Hook and Release” sport-fish fishery in Ketchikan, AK (Clover Pass) area, from April 1st through June 14th. I support this proposal to also be used in all areas that currently have fishing restrictions enacted due to stocks of concern throughout the Southeast region.

TSI/ATA RC (SUPPORT)

This RC was created by two (2) prominent stake-holders in the Pacific Salmon Treaty, as well as, using model projections provided by ADFG for non-resident annual. It upholds the historic 80/20 split between trollers and the Southeast sport fishery.

Ketchikan AC-RC (SUPPORT)

This RC was created by residents, commercial charter business owners, and trolling representatives, using model projections provided by ADFG. This RC provides equal opportunity for all stake-holders involved with the Pacific Salmon Treaty allocations in Southeast Alaska.

Submitted by: Brent Crowe
Community of Residence: Haines

Greetings BoF

Alaskan Resident of 48 years

110

King Salmon proposals- I am in support of proposal 110 written by the ATA. The nonresident take of King salmon and regulations governing that take are proving to be a reallocation of the resource from a largely resident troll fleet to the largely nonresident owned charter industry. Any efforts to stop this reallocation and allow the charter industry to bear their share of the conservation burden has my support. I support a lodge industry but not at the expense of local residents sport fisherman and the trollers that have paid for and have historical right to the resource.

In addition if the board feels the legal need to address concerns about differential regulations in federal waters they must assert the states right to manage our resources for the benefit of our economy and our freezers. You must pass one of the proposals regulating landings of fish caught in federal waters.

156

I oppose this proposal. Besides being written improperly and probably shouldn't even be in the book it doesn't really address specific concerns. While I believe a conversation around markets and abundance could be warranted the BoF isn't the proper regulatory venue. Under current market conditions and the current economic circumstances a 25% reduction could crush and bankrupt hatcheries, fleets and processors.

203

Oppose Unguided fisherman don't need more access. We have a serious situation concerning the unguided fleet in southeast. Current regs are hard to enforce and we really don't have a grasp on the actual volume of fish being exported. Residents are not allowed to fish lingcod during winter months. We should be covering substance needs before allowing for more opportunity for nonresidents

222 Oppose!!! This only allows for one week of personal use shrimp before the commercial fishery. Even if there went a commercial spring fishery for a few alaskans spring is the only time we can get out for personal use. May through fall is the busy time. I suspect actual harvest and effort in March and April is very small and effects are minimal. Also I'm not sure that the science is sound. It sounds very theoretical and unnecessary. Any shrimp harvested during this "sensitive" time are DEAD and eaten. It's not like with crab where the females are released to spawn.

Submitted by: Richard Curran
Community of Residence: Sitka

Proposal 198: Oppose. I do support resident access to blackcod but there is significant opportunity for blackcod retention in the personal use (50 annual) and subsistence (unlimited) fisheries in Southeast Alaska. I am strongly opposed to any nonresident increase because they are growing with no restraints. There is no limits on the number of anglers or guides for blackcod and bare boat charters are exploding and impacting locals access to fish.

King Salmon:

Oppose Proposals 108, 113

Support Proposals 109, 110, 111

I believe strongly that we should support 80/20 split between commercial and charter fishing and use in season management to control charter harvest to their allocation. This is demonstratively possible, it just takes the will of ADFG to accomplish this.

Proposal 230: Oppose. Squid are a forage fish whether or not they are classified as one. We do not need to take feed from halibut, salmon, marine mammals and seabirds. Some of these species like squid are only temporally available and to promote fishing on these species is a recipe for disaster. Have we learned nothing?

Proposal 203. Oppose. I do not support an increase in nonresident bag limits. The nonresident and outfitted sport fishermen (bare boat)has increased exponentially creating conflicts and displacing resident fishermen. The BOF should develop definitions for guided and outfitted fishing and limit this newest sector before any increases to nonresident bag limits.

Submitted by: Victoria Curran
Community of Residence: Sitka

King Salmon:

Oppose 108, 113,

Support 109, 110, 111

Please continue to support the 80/20 split between commercial and charter fishing and use in season management to control charter harvest to their allocation. This is possible, it just takes the will of ADFG to accomplish this. Changing the allocation to accommodate charter fishery implies the department is unable to manage this fishery, sector which is not true, and will lead to elimination of the long-standing commercial troll fishery in fairly short order. The management answer cannot always be to give the charter sector more fish.

Herring:

Support 173-177, 179, 181, 190

Oppose 182, 183.

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I support proposal 179 to add Promisula Bay to the herring conservation area in Sitka Sound. This bay continues to be an important subsistence harvest area and as fish move with changing age classes and genetic substocks as well as changing ocean conditions subsistence areas should be protected for that use.

I oppose 182 and 183 because I do not support new commercial fisheries for herring. Sitka Sound herring is the last strong stock of herring in Southeast and one of the last herring stocks in Alaska. Even if not classified as such by the BOF herring are a key forage fish. New fisheries for forage fish are prohibited under State regulation. This should apply to the Sitka Sound stock as well. The sac roe fishery is on its way out economically and it is a perfect time to recognize that we should not be harvesting herring for commercial purposes. Let the ecosystem have the fish if the sac roe fishery becomes unviable. Although roe on kelp and open pound fisheries are theoretically better for the resource than seine sac roe or reduction fisheries there should not be directed commercial fishing on forage fish.

I support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework.

Groundfish:

Proposal 198: Oppose. Although I support resident anglers having access to resources, in this case there is significant opportunity for blackcod retention by residents through personal use (50 annual) and subsistence (unlimited) fisheries in Southeast Alaska. Given proposal 105 and its implications, increasing the resident limit could result in a huge increase in catch because of the lack of limits on the rapidly growing bare boat/outfitter sector of the fishery. The BOF needs to take the time to define these new sectors and set limits to protect local access and food security.

Squid:

Proposal 230: Please oppose the squid fishery proposal. Squid are a forage fish whether or not they are classified as one. We do not need to take feed from halibut, salmon, marine mammals and seabirds. Some of these species like squid are only temporally available and to promote fishing on these species is a recipe for disaster. A fishery for squid is likely to bycatch other forage fish as well.



Kingfisher Charters & Lodge

P.O. Box 1043, Craig, Alaska 99921 • (907) 826-3350

January 13, 2025

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries:

My name is Meggie Curry and I am a staff member of Kingfisher Charters & Lodge, LLC (“the lodge”). The lodge is located on Port St. Nicholas Road near Craig, Alaska on Prince of Wales Island. Thank you for taking the time to review and listen to public comments on how the different proposals will affect each party involved before making your decisions on the proposed changes to the fishing industry; it is greatly appreciated.

Oppose the following proposals:

109: Oppose: The charter industry needs stability and the 3,2,1 formula gives early season bookings the stability needed to book clients in advance. This proposal would put the charter industry and our business on uncertain ground.

110: Oppose: This proposal in low abundance years would put a June fishery in question for our business.

111: Oppose: This proposal, although trying to be flexible, still keeps us short at 22% and in low abundance years would give us less than the 3 King salmon needed in June. The proposal also allows up to 4 King salmon in high abundance years. We would rather hold to 3 maximum King salmon for a non-resident and have the stability we have asked for in early season.

114: Oppose: This proposal reduces annual limits in lower tiers.

115: Oppose: A 1 king limit is not acceptable for the continuation of our business.

116, 117: Oppose: These proposals would greatly reduce the number of non-resident anglers willing to come to Alaska; almost all sportfishermen coming to fish King salmon come for not only the sport, but to catch a valuable food source for their families.

119, 120: Oppose: To close King salmon to non-resident sportfishermen on a weekend or during the week in June would be catastrophic to our business.

140, 141: Oppose: Going to barbless hooks isn't a good way to try to minimize catch numbers.

Supporting the following proposals:

108: Support: This proposal adds necessary protections for the troll fishery to address seasonal stability and ensure an average troll harvest equivalent to 80% of the annual harvest ceiling specified by the Pacific Salmon 110 Commission. The proposal would give the sport industry the ability to maintain a 20% average and keep our business functioning in low abundance years.

122, 123: Support: I support these proposals as no salmon should be removed from the water but released while still in the water, as it is too hard on the fish, especially after fighting for its life, the fish probably would not survive, or little chance of it.

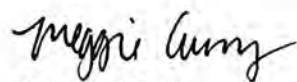
My Comments:

I am one of five daughters of the owners of Kingfisher Charters and Lodge, and was in the 6th grade when my parents started this business. The lodge just finished its 30th year in business this last fishing season. My sisters and I worked in the summers for the lodge, earning and saving money and were able to help pay our way through college. Most of my friends growing up also worked at fishing lodges on Prince of Wales Island in the summer, saving money to be able to go to college or trade schools, or to be able to start out on their own after high school. The fishing lodges have provided many jobs for young adults/adults on the Island. My family's fishing lodge is what brought my husband and I back to Craig (my husband also works at the lodge as a fishing guide). Not only are we able to make a living, we are able to be around our family, as I work with my parents, siblings, and two out of three of my brother-in-laws, and I get to see all of my nieces and nephews running around, even wanting to help with jobs sometimes. When my parents started the lodge, one of their main goals was to have a business where we could all work together as a family. I feel that it is very rare and so special that the family is still involved. I am very hopeful that the family fishing lodge will continue on for generations, and make my parents proud.

A lot of the king salmon proposals, if passed, could shut our family business of almost 31 years down, which would be devastating for our family, our guests, and also affect many local businesses and the local economy in a big way. We have family members and friends whom are trollers and I am just hoping that there will be a solution that is mutually beneficial for all parties involved so that everyone can keep operating their businesses and keep helping the local economy running in a positive direction. However, if a number of these proposals pass as written now, I fear that our charter business, along with many others, are going to have to seriously consider whether or not we/they are able to stay in business, and it will have a trickle-down effect on many other local businesses and the local economy.

Thank you for your time and consideration of our positions on these very important issues.

Sincerely,



Meggie Curry

Submitted by: Woody Cyr
Community of Residence: Sitka

My name is Woody Cyr. I am a young Sitka resident with a BS in Aquatics and Fisheries Science from SUNY-ESF. My family and I are privileged to rely on subsistence from our home. I own and operate FV Patience in the SE Driftnet, Power Troll, and Halibut Longline Fisheries. I hold the trapping seat on the Sitka AC.

Proposal 104 - Support AS AMENDED by the Sitka AC. I view this proposal as being in good faith to protect resident priority. As residents currently harvest under sport allocation the fish for subsistence should come out of the sport allocation. Vehemently OPPOSED to taking as much fish as initially proposed off the top of all user groups.

Proposal 105 - OPPOSED. The state needs to stand up for the rights of its citizens. It is an outrage to attempt to use the work of Ted Stevens to usurp our rights.

King Salmon Allocation

When I began commercial fishing as a gillnetter in 2019 and wrote my business plan, I thought that trolling kings would be a small, relatively insignificant contribution to my operation. Oh my oh dear how wrong I was. In reality, trolling kings has carried me through these seasons of uncertainty and upheaval. The real August openers were fruitful and provided some of the highest, most consistent, reliable earnings. Non resident sport has not only taken away our August troll openers but also trampled on resident priority.

I SUPPORT maintaining the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation.

I SUPPORT requiring in-season management by ADFG to ensure the sport allocation is not exceeded.

I SUPPORT prioritizing resident sport harvest within the sport allocation by controlling non-resident harvest.

I SUPPORT Proposals 109 and 110 as the structure by which to accomplish these objectives.

I SUPPORT the Ketchikan AC's RC

The unsustainable expansion of the relatively new non resident fishery impacts has increasingly negative impacts for SE trollers and their communities.

Prioritizing NR catch under lower quotas comes at the expense of SE AK residents.

ADFG sport fish staff reports (also known as RC 3 Tab 2 titled- Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries) state that the estimated treaty

harvest in the sport fishery for 2023 was 55,129 fish which was 17,090 fish over the 20% allocation based on the new multivariate model.

The sport fishery took 29% of the all-gear catch limit less the net harvest.

The estimated treaty harvest in the sport fishery for 2024 was 52,387 fish, which was 13,351 fish over the 20% allocation. The sport fishery took 26.8% of the combined troll and sport allocation.

The combined 2023 and 2024 sport overage, driven by nonresident angler harvests, pushed the sport fishery to exceed its allocation by over 30,000 fish.

Not from the report- This is unacceptable for the troll fishery, who, at roughly \$70 a fish, lost \$2.2 million worth of fish, or about \$4.5M including 1 st wholesale (loss to SE processors many of which are small community based processors) to the nonresident angler sector with no path available to timely recover that loss.

Such an egregious allocation overage should result in an aggressive and concrete payback plan. There is no proposal that adequately addresses this issue. If this issue is not addressed I support explicitly forbidding transfer of allocated fish between sport and troll.

The ADFG staff report shows continual increases in all non resident participation metrics

- o approx 50% recent increase in NR effort anglers,
- o approx 15% recent increase in angler days
- o approx 15% recent increase avg number of charter vessel trips

The ADFG staff report also shows that Juneau charter vessels are successfully operating on just 6-7 kings/season (compared to Sitka's 85-90 kings/charter vessel). This verifies that excessive NR harvest is not necessary to support the charter sector.

The Board needs to work with ADFG and the legislature to explore measures,

such as limited entry for Chinook sport fishing guides and boat rental businesses,
that would best stabilize all Southeast Alaska Chinook fisheries.

Proposal 108 - OPPOSED. This proposal masquerades as in season sport management when in reality it increases non resident sport king salmon allocation and access which is unacceptable. Averaging is never defined and the ambiguity is unacceptable.

Proposal 113 - OPPOSED. This uncompensated reallocation is completely unacceptable.

Proposal 119 and 120 - SUPPORT. If in season management is not adopted then closing down nonresidents on certain weekdays could be an effective tool to keep their harvest within allocation. This is a tool used effectively in the charter halibut fishery.

Proposals 122 and 123 - SUPPORT. King salmon require gentle handling for release. We should be doing everything we can to improve the survival of released kings.

Proposals 125 and 126 - SUPPORT. We need to take effective action to support the recovery of our stocks of concern.

Proposal 131 - SUPPORT. This is a good management tool. The single day competitive opener is my least favorite fishery.

Proposals 132 and 133 - SUPPORT. Measuring to the fork just makes plain good sense. The whole tip of the tail deal is a mess. I support Tad's reasoning for using fork length in spring.

Proposal 134 - SUPPORT. Sounds like a step in the right direction to bring folks in line with conservation.

Proposals 140 and 141 - SUPPORT as amended by the Sitka AC. Protecting our stocks of concern is paramount. Using circle hooks and no bait for a short period in favor of conservation is a fair trade off.

Proposal 165 - SUPPORT. Tim's reasoning is sound. Having openings when the weekend warriors come out in their sport boats in droves leads to more conflicts than necessary. On a Sunday with nice weather its a darn mess with gillnetters trying to keep the oblivious sport boats from hitting their nets. Just move the start to monday 5 or 6 am and it will be better for everyone.

Proposal 166 - Support. The number of fish allocated in the treaty is rarely caught. Deeper nets is a tool management could use to get us closer to our allocation.

Proposal 169 - OPPOSE.

Submitted by: Jerry Dahl

Community of Residence: petersburg

156 I oppose there is no biological standing to reduce the hatchery production

227 i oppose this would not reduce gear in the water but. increase gear and areas will close faster.

242 i oppose we should not build more special use areas.

243 support we need to harvest the allowable lbs of crab to keep a healthy stock not harvesting does nothing and hurts the stock not taking the large male crab out

Comments Regards Chinook Proposals

In Support of Proposals: 106, 107, 109, 110, 114, 115, 116, 117, 119, 120, 129, 130, 131, 132, 133 and also 158

In Opposition to Proposals: 104, 105, 108, 113, 121

Dear 2025 Board of Fish Representatives,

I am a third generation Salmon Troller in Sitka, AK. I fish the entire outside coast of Southeast Alaska often porting out of rural outport villages such as Pelican, Elfin Cove, Yakutat and Craig. My grandmother moved from Oregon to fish Southeast Alaska in 1971. I grew up in Pelican and my father salmon trolled out of the Cross Sound area for 3 decades. My brother and I started helping out on our family boat when we were children, fishing is my family's way of life. I currently reside and port my small vessel in Sitka. I am a SE salmon troll permit holder and have been for 18 years. I am passionate about harvesting Chinook salmon and depend on it as my primary source of income, approximately 60-70% of my income. Coho and Chum are a small supplement/alternative to Chinook in my operation as opportunities for those species are dependent on market prices and runs which are unstable and undependable. My small scale business depends on access to Chinook salmon and that access is essential to the survival of my business which has been heavily struggling for the past two years, not with out coincidence to the loss of our August king salmon opening. Many of my past seasons have pivoted into profitability from the August king opener and having lost it in 3 out of the past 5 seasons, has been nothing short of devastating. To be frank, the lack of access to our full summer Chinook allocation has put my career on precarious grounds, I will not be able to remain solvent if the governing bodies continue to re-allocate troll quota to other gear groups. This isn't a matter of riding out some lean years and waiting for better fortune, which I have done before, this is existential right now. I don't believe the troll fleet can survive any further reductions or restrictions to access of our quota allocation, maybe some can, I certainly cannot.

I strongly oppose any proposal under review that allocates quota away from the historic small scale Chinook troll fleet of Southeast Alaska. Every single fish matters to me. As a resident holder of a limited entry salmon troll permit, I am entitled to the troll quota set by an abundance index and our traditional 80-20 allocation, not the leftovers after the out of state lodge guests get their unregulated (in-season) and unmanaged (limited entry permit) crack at them. I built my life and career in Southeast Alaska and that is founded on the access afforded to me by the permit that I purchased. I strongly urge the board to refrain from approving any proposals that allocate Chinook away from the troll fleet in favor of lodge guests. They can have an amazing Alaska vacation experience in this place we all love without taking any Chinook home with them. There is abundant beauty, wildlife and a plethora of species to fish recreationally for.

Tourism is a growing juggernaut and lodges are going to thrive regardless of how many Chinook their

guest are allowed to harvest. Alaska offers far too much natural beauty for guests to experience and there are many, many fish in the sea to harvest. Chinook, due to our quotas is not one of them. I think it is crucial to consider what it means to be an Alaskan and what our future looks like. I respectfully ask board of fish members to consider our rural, historic and traditional ways of life which are at stake and take meaningful action.

I am not going to mention specifics of proposals or dissect and argue finer points. I respect the board and believe you were appointed for good reasons to do an important job. I appreciate the gravity of your work and I thank you for your service to our community.

Sincerely,

Joseph Daniels – F/V Amnicon – ANB Harbor - Sitka, Ak

A solid black rectangular redaction box covering the signature area.

Comments on Proposals 202 and 200

In Opposition to Proposals 202 and 200

Dear 2025 Board of Fish Representatives,

Regarding Proposal 202: Clarify that one line can be used in the directed dinglebar fishery

This proposal does not seek to bring clarity. It aims to make preparedness and having spare gear illegal.

If the Department of Fish and Game wanted more clarity the proposed wording should have been:
“Only one (1) troll gurdy wire can be deployed and any given time”

Declaring that leaders, trains and spare gear are called “an operational unit of dinglebar gear” conflates the separate parts used for fishing and creates ambiguity.

A dinglebar “train” is a leader that can be connected and disconnected.

This is thoroughly established and was clearly explained to ADFG and wildlife troopers in court by a Judge in March of 2024 in the case of the State of Alaska vs. Joseph Daniels where I was charged with “operating more than one dinglebar line”. The case was dismissed and the Judge made comments and a stern rebuke of law enforcement, the prosecution and ADFG for not understanding commercial fishing gear or the english language very well.

Proposal 202 is misguided. However, the reason it should not pass into regulation is based on logic.

Proposal 202 would make having spare gear illegal. So in practice, if I were fishing at the Fairweather Grounds and hung up and lost my “train” I would have to travel 20 hours back to Sitka to pick up my spare gear. This would effectively make the fishery untenable.

I have participated in the directed troll dinglebar fishery for 11 consecutive seasons and commonly fish in areas up and down the coast including the EYAK (Fairweather Grounds) area. In May of 2023 ADFG department managers contacted the troopers and coordinated them out to do a surveillance operation on my vessel where they photographed, interrogated me from their skiff and video recorded my operation and then I was cited for using more than one “line”. I was the only boat that was cited. At trial the Judge, after seeing photo, video and audio evidence, diagrams and hearing extensive comments from the prosecutor, ADFG personnel testimony as well trooper testimony, declared a dismissal and gave statements. In his rebuke of the prosecution he made clear that a having a second spare dinglebar “train” onboard or dragging at the water's surface gives no such advantage to a vessel in this fishery nor

carries any potential to catch more fish when it is not connected to the wire and deployed as lingcod are exclusively bottom inhabitants. The judge in his wisdom understood the current regulatory definition of dinglebar gear to be succinct and accurate and that trailing a second train in the water in-between deployments was a logical, legal and efficient use of this type of gear.

ADFG states in the proposal that vessels are using more than one "line". This is fundamentally false and has been declared so by an Alaska court Judge. I was the only vessel accused of this and it has been thoroughly documented by law enforcement before a judge and proven in court that the current regulation is clearly stated and my vessel was operating in perfect accordance to the regulation. This proposal does not bring additional clarity. It conflates the different parts of gear into a single item and would effectively outlaw having spare leaders to clip on to the wire.

The ADFG prospectus states: Vessels are operating multiple lines leading to increased harvest rates; because of this permit holders are exceeding guideline harvest rates.

This statement is just not in any way true.

Having been a participant in this fishery for over a decade, it is very clear to see that increased effort and increased abundance is what has caused the increased catch rates, not regulation ambiguity. Department managers are responsible for exceeding guideline harvest levels, not permit holders. If the primary concern is to slow the pace of the fishery for department managers to more accurately manage the quotas then a case should be made for transitioning the fishery to limited entry instead of the open derby system and a couple of proposals that will not be effective in making the fishery easier to manage and cause undue hardships on participants.

Perhaps these are moot points because this proposal would effectively end the EYAK fishery as well as other areas. If it were to become illegal to carry spare gear onboard, I could not participate in the harvest in remote areas.

Regarding Proposal 200:

Making daily or hourly catch reporting a mandatory regulatory requirement premisses a false assumption that at sea communication is always possible. Technology has improved over the years with many vessels equipping with satellite text and starlink. However, not every vessel has this equipment or can afford it nor is the equipment anywhere near 100% dependable. My vessels has starlink but it is unstable and not dependable in certain areas offshore like the fairweather grounds. Am I going to be subject to regulatory citations if my starlink is inoperable?

Thank you for hearing my points. You have a difficult job and much like a Judge or a legislator, it is a very important job. I appreciate your time and consideration.

Please feel free to reach out to me with any questions about my experience with these issues, I would

be happy to talk.

Sincerely,

Joseph Daniels – F/V Amnicon – ANB Harbor - Sitka, Ak



Submitted by: Atlin Daugherty Daugherty
Community of Residence: Juneau Ak

Oppose 242 sport fish already gets a large portion of 11-A red crab with annual openings and harvest. Commercial harvest and opening being very limited in 11-A. The allocation dose not need to be changed.

Submitted by: Eric Daugherty
Community of Residence: Juneau

To the Members of the Alaska Board of fisheries,

My name is Eric Daugherty, and I have lived in Southeast Alaska for my entire life (34 years). I have participated, as a crew member, in the Southeast Alaska Commercial Red King Crab season during 2011, and 2017, and I strongly oppose proposal 242.

Proposal 242 is just plain unfair to the commercial fisherman who have invested in the fishery. There have been only two commercial red king crab fishing openings in 11a since 2011. One in 2011 and one in 2017 in which there were a total of 3476 red king crab harvested. In a management report made by ADFG, in between 2011 and 2020, there were 9459 personal use red king crab taken in 11a. Since 2020 there have been personal use openings every year since then. There is no justification to permanently close 11a to commercial fishing for red king crab.

Please oppose proposal 242

Eric Daugherty

Submitted by: Eric Daugherty
Community of Residence: Juneau

To the Members of the Alaska Board of Fisheries,

My name is Eric Daugherty and I have lived in Southeast Alaska for my entire life of 33 years. I have been Gillnetting in Southeast Alaska (s03a) for 13 years, mostly out of Juneau.

I strongly oppose proposal 156.

For most of my gillnetting career, I've benefited from Dipac's hatchery programs, and a 25% reduction of hatchery fish would have immediate negative effects for not just myself and my family, but the rest of the commercial fishing community, the sport fishing community, and most of Southeast Alaska communities as a whole. Because of the higher costs of operating, Proposal 156 has the potential to make it impossible for for salmon enhancement programs to continue.

Please oppose proposal 156 so that Southeast Alaska fishing communities can continue to have salmon to harvest.

Eric Daugherty

PC120

Submitted by: Todd Daugherty
Community of Residence: Juneau

As a lifetime Alaskan and Juneauite for 63 years, 39 as a commercial fisherman I oppose

Proposition 242. Since 2011 commercial fishermen have fished two days in 11A with a total catch of 3476 crab total, personal use has caught 16500 to date excluding this last personal use fishery. The allocation of 40% commercial and 60% sport is clearly not being met. With that being said the heart of the red king crab grounds in 11A is already closed to commercial fishing.

Todd Daugherty

F/V Cindy Kay

PC121

Submitted by: Richard Daugherty
Community of Residence: Juneau

I am a commercial Red King Crab permit holder and wish to fully support proposal 243 for the following reasons.

Adoption of this proposal will remove the 200,000 lbs threshold that is currently in place and would allow for a smaller, limited harvest.

I support this proposal because allowing for a smaller harvest is significantly better than than no harvest which is where we are now with the current management plan.

I urge you to adopt this proposal.

Thank you,

Richard Daugherty

F/V PHOENIX

Submitted by: Richard Daugherty
Community of Residence: Juneau

I am a commercial Red King Crab permit holder,I am writing to express my opposition to proposal 242 for the following reasons.

1.Adoption of this proposal would likely close the commercial Red King Crab fishery area wide in Southeast Alaska as the 11A biomass is crucial to the overall biomass when calculating the available surplus in order to open the commercial fishery.

2.The proposal implies that there would be no significant economic loss to the commercial fleet if this measure is adopted,I could not disagree more.Any permanent loss of income to those permit holders,crewman,processors is important to them!

In addition closure of the Red King Crab fishery in Southeast Alaska which could easily happen if this proposal is adopted and would lead to a collapse in permit values with a potential direct loss of 45k to 55k for each permit holder.

3.In the past 7 years there has been no commercial harvest in 11A although the commercial fleet is allocated 40% of the available surplus.

In that same 7 year period the personal use fishery has been open every year and has taken over 13,000 king crab,yet somehow it is only the commercial fleet that impacts the resource!

4.Living in Juneau as I do and personally participating in the 11A personal use fishery,I would say at least 80% of the harvest is coming from an area within 11A that is already closed to commercial fishing.In addition a significant number of the participants in the 11A personal use fishery have vessels capable of fishing outside of 11A and frequently do so.Adoption of this proposal would have a very limited benefit to the 11A personal use fishery but would have a devastating impact to the commercial fishery.I urge you not to adopt this proposal.

Thank you,

Richard Daugherty

F/V PHOENIX

Submitted by: William Davidson
Community of Residence: Sitka

I am opposed to proposal 156 to limit hatchery pink and chum salmon egg takes in Southeastern Alaska by 25%.

I currently serve on the NSRAA board and I am a retired regional management biologist with ADF&G.

In my opinion this proposal would:

- 1) have little likelihood of achieving the desired result of reducing interspecies competition in marine waters and thus benefitting Chinook salmon;
- 2) create disruption to PNP hatchery operations and economic viability;
- 3) be disruptive to the harvesting and processing of seafood at a time when the industry is already impacted by declining prices;
- 4) if adopted, would be subject to legal challenges.

Submitted by: William Davidson
Community of Residence: Petersburg

I am writing in support of Proposal 156. The indiscriminate dumping of tens of millions of chum and pink fry has upset the balance between available food and the fish dependent on it. Chinook stocks have dropped drastically, and the average size has also decreased significantly over the last 20 years.

I speak directly to the decrease of kings in Thomas Bay. In past years there were always many sublegal fish, but these numbers have been dropping. I'm guessing that the problem lies between the lack of food and the killing of young fish and legal sized by the seine fleet targeting Thomas Bay chums. The personal use shrimping has also gone to hell. I blame the release of millions of fry. Thank you.

Submitted by: Patrick Davin
Community of Residence: Juneau

Rockfish proposals:

206 - support. Last year I caught a lot of yelloweye in SE and descended them. They don't seem to be extremely rare so I'm not convinced ADFG has shown enough data to indicate they are endangered. I caught one huge yelloweye that took a lot of weight to descend and took us a long time to rig up enough pounds to descend him (decreasing his chance of survival). If there are enough yelloweye, it would be good to allow residents some discretion in which to descend (the young ones) and occasionally keep one.

207+208 - support with modification - allow non-residents 1 quillback/day and 2 annual limit. Quillback are the most common non-pelagic rockfish in Southeast. I catch them more than any other. It might be nice to throw a bone to the non-residents who are tired of descending quillbacks.

209 - support. Residents should not be penalized for sport charters (mostly out-of-state non-residents) catching a lot of pelagic rockfish.

210 - oppose because it applies to residents too when the problem is due to the 10s of thousands of charters. ADFG should put commercial charters into a separate bucket. They are doing commercial fishing, they are not the same as amateur unguided sport fishermen/women.

Submitted by: Patrick Davin
Community of Residence: Juneau

I oppose proposal 222 because it restricts personal use / subsistence shrimp harvest without showing adequate biological justification. Please reconsider or give more time for study.

1) Spot shrimp don't only spawn in March/April, some of them carry eggs throughout the year.

Last summer when finding spot shrimp with eggs in July, I was perplexed by the ADFG species profile webpage that says spot shrimp only spawn in the spring. That is obviously incorrect. So I reached out to Sherry Tamone (UAS biologist involved with a previous Sea Grant study of spot shrimp) and Max Schoenfeld (ADFG biologist). Both Dr Tamone and Schoenfeld said that spot shrimp can spawn throughout the year, with some holding their eggs till the fall. It's true the majority may spawn in the winter/spring, but salmon spawn in the fall and we're still harvesting egg-carrying salmon. Why can't we manage shrimp in some way other than a closure?

2) Why can't we just release egg-carrying shrimp? I don't want to harvest shrimp with eggs so I generally release them. ADFG hasn't shown that the survival rate would be low. We release endangered yelloweye rockfish and undersized king salmon. Released king salmon have some mortality, and this is acceptable but for shrimp it's not?

3) Personal use harvest of shrimp in March/April is a trivial amount of the biomass. ADFG simply hasn't shown that this is a big problem, compared to the impact to the shrimp fishery by commercial shrimping. On average I only harvest 10 shrimp per pot pull (pulled by hand). Some personal use users are amateurs, we don't know the good spots or don't have access to them, and 10 shrimp are trivial in the overall tonnage of harvest.

You said 19-26% annual spot shrimp harvest comes from the personal/subsistence/sport segment. But what percentage of that happens in March/April? Probably less than 1%. Further, 1/4 of annual harvest isn't even that big - who is harvesting the other 75%, and why not restrict them before restricting personal use? Logically that could do just as much good for the fishery.

PC124

Submitted by: Patrick Davin
Community of Residence: Juneau

I support proposal 242 (red king crab personal use).

It's a great idea to make it more feasible for casual personal use users to harvest a small number of king crab. Under the current system I cannot participate in the king crab fishery at all because the openings are too short and often in terrible weather or times of year when I cannot safely participate.

Ex, in the winter there may be a gale or sub-freezing temps, or my boat is winterized and I can't go out anyway. In the summer, the opening is too brief (3-7 days?) to participate because I'm often busy or out of town.

I just want to harvest one or two red king crab. The current system makes it impractical for me to do so. I also think personal use should take priority over harvesting king crab for profit (commercial use). Although I appreciate the work commercial folks do, and I do buy brown king crab from them sometimes, it would be a more fun and Alaskan experience to harvest one on my own. That is the spirit and purpose of the personal use fishery.

Submitted by: Caroline Daws
Community of Residence: Sitka

Dear Board of Fish,

As a scientist, my interest in the board of fish is especially concerned with promoting healthy fish stocks that will sustain us for generations to come. I have a PhD from Stanford University in Ecology, and I am concerned when I hear reports about the rise in herring stocks in the last three years as grounds for a more aggressive commercial fishery -- when we zoom out the regional and even global scale, herring are in a precarious position, extirpated from regions in Japan and other parts of Alaska that used to be flush with herring returns. We have an incredible and perhaps last opportunity to manage the Sitka herring populations with a global and long-time scale perspective, rather than one that considers only the last 5 years. It's interesting as well that this boom comes when fish are likely to be returning to spawn from a year with no commercial herring fishery in 2020. The Board of Fish should take up proposals 173 and 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I have not heard anyone in Sitka advocate strongly for any high volume or non-food herring fisheries in Sitka. Alaska is known for its top notch quality seafood and its well-managed ecosystems. Utilizing herring for fish meal or non-food products would mar Alaska's reputation as a place where human and more than human systems are interconnected and where reciprocal respect with the natural world guides our policy.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. This is absolutely essential for moving forward in fisheries and taking a long view of this ecosystem. I strongly support proposal 179 to protect an important subsistence harvest area for herring eggs close to Sitka Sound. This is geographically a very small area for the commercial fishery but an absolutely critical habitat for herring spawning. It's a no brainer to protect this area for herring spawning to promote herring population recruitment and protect subsistence harvest areas. I also support proposal 181 which will help to minimize herring mortality from test sets. Reports from Thornton et al's 2021 Herring Synthesis highlight how test sets can disrupt herring spawning behavior, causing early and immature spawn. While I understand the need for ADF&G to test for egg maturity in order to thoughtfully manage the commercial fishery, I believe there should be realistic biological limits on these test sets. Taking excessive and early test sets will only serve to further reduce herring fecundity even beyond the herring that are caught in the sac roe fishery before they can spawn. Let's set reasonable limitations so that ADF&G uses their test sets more intentionally and sparingly.

I thank you for your work in safe guarding our precious natural resources and I look forward to participating in public testimony at the Board of Fish in February. My perspectives on the proposals are listed below.

Sincerely,

Dr. Caroline Daws

Proposal Recommendations:

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Edward Day of Valdez, Alaska. I am a commercial and personal use fisherman.

A consistent supply of fish is needed for a steady price and market share. A lack of fish in one region causes vessels to move to different regions. This adds more pressure to other regions and less fish for those regions' constant fleets. Revenue from commercial harvest helps fund fish for Alaska's sports sector. So, axing one directly affects another.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken

the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Edward Day
Valdez, Alaska



Gig Decker

Wrangell, AK

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

RE: Opposition to Proposal 156

January 14, 2025

Dear Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries,

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Over the last 15 years, salmon hatcheries have provided approximately 25-35% of my annual gross revenues from salmon each year. I am opposed to Proposal 156 for essentially two reasons. First, it is not in the Board's authority to manage salmon hatchery production through egg-take; instead, that authority lies with the Commissioner of ADFG. Second, it will cause economic harm for no conservation benefit.

Hatcheries were established differently in Alaska with significant and necessary restrictions in the form of Alaska's Sustainable Salmon Policy and Genetic Policy. They are enhancement programs historically supported by the state for the benefit of all Alaskans – subsistence, personal use, sport, commercial. The research that is ongoing through the Alaska Hatchery Research Project is critically important to support and monitor, as it is at the forefront of our understanding of local impacts of pink and chum salmon hatcheries in Southeast and PWS, as implemented under the policies established by the State to protect wild stocks. Thank you for providing a presentation on this ongoing research at the Cordova meeting.

Opposition to Proposal 156 is grounded in the need to protect sustainable hatchery production in Southeast Alaska and around the state. Reducing egg take by 25% will have a significant economic impact and harm resident fishermen of all types and processors dependent on this production. For commercial fishermen alone, ADFG estimates a loss of over \$13 million in pink and chum salmon harvest revenue as a result of the proposal, not including losses to processors, tenders, support businesses, sport fishermen, subsistence, or the resulting downstream effects on communities in Southeast Alaska. This is not the time to harm salmon fishermen, especially for no conservation benefit to any other fishery or stock. The proposal fails to acknowledge the public process and any scientific basis for action, and simply will not benefit Yukon River Chinook salmon returns as the proposal implies.

Additionally, please review the following reasons why the Board should oppose and reject Proposal 156:

Economic Significance of Hatcheries:

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Juneau, Sitka, Petersburg, Wrangell, Ketchikan, Metlakatla and Craig, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and

reduced income for commercial fishermen, processors, and local businesses. It would also impact various lodges in the region.

Preserving Access for All User Groups:

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Responsible Management:

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 156:

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 156 and instead continue to support salmon hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Gig Decker
Southeast Alaska Gillnetter

Submitted by: Andy Deering
Community of Residence: Craig, Alaska

I am writing in full support of Proposal 156.

I believe the North Pacific Ocean has reached, or likely exceeded, its carrying capacity for salmon. This extraordinarily large biomass of salmon, mainly due to recent increases in hatchery salmon production, is likely to be the cause of diminishing size of all salmon species.

What is equally or even more important, is that the large increase in hatchery salmon has, according to the vast majority of scientific studies dating back to the 1970's, HAD A NEGATIVE EFFECT ON WILD SALMON STOCKS.

I believe it is therefore imperative to begin scaling back hatchery salmon production if we are to give the natural stocks of salmon the best chance of returning to their former healthy and sustainable numbers. In addition I believe scaling back hatchery salmon production will help return the North Pacific ocean to a predator/prey balance which is important for all species - not just salmon.

I am a commercial salmon troller, living in SE Alaska and make my living from catching salmon - many of which are hatchery fish. In the short term, there will be some pain associated with hatchery reductions, but I believe in the long term I, and the natural populations of salmon, will be better off for it.

We never should have considered hatcheries to be an end-all solution to diminishing returns of wild/natural salmon. Doing so has given a false sense of security in that simply producing larger returns by making artificial fish leads people to believe all is well with the ecosystem when in fact all is not well. We should have been focusing on returning wild/natural stocks to their former abundance.

I support across-the-boards reductions in salmon hatchery production.

Sincerely, Andy Deering

Submitted by: Emily Delaney
Community of Residence: Ketchikan

108 Oppose - I do not support in season transfer of troll fish to non residents.

111 Support - The charter fishery needs to have a cap that is enforced, and this seems like a logical approach to allocating fish.

113 Oppose - I want the sport fishery to be managed consistent with proposal 111, 25% seems like an excessive amount since the majority of the fish are caught by non-resident anglers.

Submitted by: Jedediah Delong
Community of Residence: Sitka

Dear Board Members,

I'm writing about the Sitka sound Herring sac row fishery. I have been a lifelong Sitka resident, and have witnessed the abundance of visible herring spawn decrease over my lifetime here. I am not a commercial fisherman, but have many friends that are. While I support Alaska's fisheries, I don't believe we should be sacrificing one for another. Herring are at the base of the food chain that many of the commercial, sport, and subsistence fish rely on. It has become clear over the last several years that we may not be as good at "managing" fisheries as we once e thought. There are many stocks of concern all over the state. I urge you to reduce the sac row fishery quota, and help preserve and protect what stocks we have left. We do a lot of subsistence fishing and hunting for our family, and I would like my children to be able to do the same as they grow up. Please put this natural resource and the longevity of our lifestyle before lobbying dollars and politics this year. Thank you,

Jed

Submitted by: David Demmert
SEAS

Community of Residence: Olympia, WA

I am agreeing with SEAS stance.

I want to mention specifically on proposal 156, I oppose this proposal as I believe we need the all the opportunities to harvest greater numbers of salmon to aid our position in the world market.

Submitted by: Nirali Desai
Community of Residence: Sitka

I have been lucky enough to learn how to harvest herring eggs from traditional knowledge bearers and be steeped in the cultural, political, and scientific realities of living in Sitka - the last place there are substantial herring returning to spawn. With this experience, I want to recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. I understand that there may be specific amendments that allow for these motions to pass at this time, but I want to give my absolute support. Passing these proposals is necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I have been part of the efforts to distribute herring eggs across Southeast Alaska and the wider region from the herring egg harvest in Sitka because it is the only place that this type of harvest is viable. It continues to be devastating to local fishermen, small-time harvesters, and the entire region that this traditional food source is not protected.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework - and want to commend this incredibly detailed proposal on all its merits.

I want to speak personally to and strongly support proposal 179. I have personally learned how to harvest herring eggs in this area and have seen the seining boats mooring in this bay, driving the herring out of this bay, and continuing to disturb the spawning grounds even after there is active spawn. Even if there is no active fishing in this bay, to keep the herring safe and the spawn as productive as possible, we need to protect Promisila Bay.

I also support proposal 181 to minimize herring mortality from test sets.

Submitted by: Casey DiGennaro
FV Eileen

Community of Residence: Sitka, Alaska

To the Alaska Board of Fish,

I am writing to express my strong opposition to Proposal 113, Section B-4,5, which seeks to decrease the percentage of fish allocated to the commercial trolling fishery and increase the allocation to the sport fishing sector. As a commercial troll fisher and lifelong Sitka resident, I am deeply troubled by the potential negative impacts this proposal could have on my family and the broader Alaskan fishing community.

The commercial trolling fishery is a vital part of our local economy and way of life. Most of the troll fleet consists of Alaskan residents who, like myself, depend on the king salmon harvest for our livelihoods. My kindergarten son, a third-generation Sitka resident, and I rely on commercial salmon fishing to support our family and maintain our home in this beautiful state. Reducing the allocation for the troll fishery from 80% to 75% and increasing the sport fishery's share from 20% to 25% would directly harm families like mine who are dedicated to preserving the traditional Alaskan lifestyle.

This proposal does not consider the significant contributions of the commercial trolling fishery to the Alaskan economy and the well-being of local residents. It is essential to recognize that many commercial fishers are lifelong Alaskans who are deeply invested in the sustainability of our fisheries and the preservation of our communities. By shifting the allocation towards the sport fishery, the proposal risks undermining the livelihoods of Alaskan families who have depended on commercial fishing for generations.

I urge the Board to reconsider Proposal 113 and take into account the critical role that the commercial trolling fishery plays in supporting Alaskan families and sustaining our traditional way of life. Protecting the interests of local fishers is paramount to ensuring the continued prosperity and stability of our communities.

Thank you for considering my perspective on this important issue.

Sincerely, Casey DiGennaro

Submitted by: Brendan Dirks
Community of Residence: Craig

I write this letter in support of the proposals number 108 and 113. I believe these are common sense practices that will provide longevity and sustainability to the king salmon fishery.

I also must strongly oppose proposals, 116 117 118 119 120 140 and 141. There is no previously established science based evidence that correlates any of these proposals that would lead to the preservation of the fishery. Furthermore, the amount of lost tourism that would result from these proposals being implemented would not only greatly impact the charter fishing industry, but Alaska tourism in general and many of the local economies that depend on tourism.

Submitted by: Leif Dobszinsky
Community of Residence: Fox Island, WA

I oppose proposal 156, A 25% reduction in egg takes would severely impact SE Ak PNP hatchery operators. Hatchery operators in SE have broad support across all users and stakeholders, any forced change would impact current programs directed toward commercial, sport, and subsistence users.

I support proposal 159. Helps persecute a better seine fishery.

I support both proposals 158 and 162. Several proposals address blind slough. These 25 year old regulations need to be updated based on the new reality. An increased level of harvest from self guided anglers, mixed with low returns is making Brood collection at Crystal Lake hatchery increasingly difficult. The Andrews creek stock collected at the hatchery is needed for sport and commercial programs from Anita bay to Juneau. Hopefully some changes can increase the number of Female salmon reaching the hatchery.

I support proposal 157. A Burnett inlet THA is needed so excess hatchery chum salmon can be cleaned up with common property fisheries. Its just another tool besides cost recovery operations.

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Vera Dodson. This is another Camel's nose under the tent scenario. Once the legislatures who know nothing of what those who rely on this industry start sticking their nose in "All is Lost". Let those who subsist in this industry determine the parameters to keep their livelihood sustainable.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery

programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Vera Dodson

A solid black rectangular redaction box covering the signature area.

Submitted by: Matt Dohner
Community of Residence: Washington

[]
SEP

OPPOSE Proposal 134 Penalties for Chinook Retention

OPPOSE Proposal 156 Reduce SE AK Hatchery Reduction by 25%

SUPPORT Proposal 157 Create Burnett Inlet THA

SUPPORT Proposal 158 Definition of Hidden Falls THA lines

OPPOSE Proposal 167 Increase purse seine length

Neutral Proposal 168 Use of spotter planes in THA's

Submitter: Matt Donohoe
 [REDACTED]
 Sitka, AK
 Phone No: [REDACTED]
 Email: [REDACTED]
 Submitted by: January 2021
 Subject: Comments on Finfish Proposal for 2025 BOF

Dear Board of Fisheries Members,

Hi. My name is Matt Donohoe. I've been an Alaska resident for over 50 years. I have lived off the road system in Southeast Alaska for the last 45 years. In all that time I've depended entirely on small boat commercial fishing to live and to raise my kids who still live in Southeast Alaska. I hope you'll take the time to read and consider my comments posted below.

MD

Proposal 104 - Oppose as written.

Proposal 104 seeks to establish a Subsistence allocation of 5,000 Kings or 5% of the all gear allocation, whichever is greater.

If the Department had done their job, which includes inseason management of the non-resident sport harvest, residents would have gotten all the kings needed in 2024. The Department made a choice not to manage nonresidents. ADF&G knows **there is no language in the KSMP that disallows inseason management.** That language; [PROVIDE STABILITY TO THE SPORT FISHERY BY ELIMINATING INSEASON REGULATORY CHANGES, EXCEPT THOSE NECESSARY FOR CONSERVATION PURPOSES] was removed, at SEAGO's request, by the BOF in 2022. Not managing nonresident sport inseason was not a requirement of the KSMP.

Because there is no resident king salmon annual bag limit Alaskans should have gotten all the kings they needed in 2024. What happened instead was ADF&G knowingly reallocated Treaty kings from residents to folks from other states. This was a choice. Now the beneficiaries of that choice, guided sport, who created the problem in the first place, are wringing their hands and cynically crying, "We just want to get fish to residents". They are lobbying for an unnecessary subsistence harvest that would devastate resident commercial trollers but provide them with more economic opportunity. More potential clients and a second hand allocation for guided sport.

What is the effect of this proposal.

Under this proposal in **2024 the subsistence allocation** would have been **over 10,000 kings** (not 5,000). The majority of these fish would come out of the commercial Troll allocation. SEAK trollers are 85% AK residents. 31% of power troll permits are owned by Alaska Natives. Many of the hand troll permits are owned by Alaska natives.

Although never before designated subsistence in SEAK once established a subsistence king salmon harvest would be the priority use of king salmon. **It is doubtful that any cap on a subsistence fishery could be enforced while kings remained on the table.**

SEAK fisheries are allowed many less Treaty Chinook compared to historic harvest. Would it be **possible to write a subsistence allocation that starts in September** (for instance)? I don't think

10,000 fish (certainly not 5,000) could last all year. Would it be possible to cap the individual harvester to a number of fish similar to subsistence deer harvest?

In the Oral Argument words of Alaska’s attorney Laura Wolf when she successfully defended Alaska in the Wild Fish Conservancy suit at the Ninth Circuit Court of Appeals (7/18/24); ...**“It [taking away king salmon from the commercial fishery] forces people into poverty or [they] choose to leave these very small rural communities and that [has] is huge cascading effects, it’s not just harm to some fishermen it’s [harm to] remote isolated communities”.**

Proposal 105 – Oppose

ADF&G is not qualified nor is it the Department’s job to pontificate on what’s allowed under the Magnuson/Stevens Act (MSA). That authority is with the Department of Law (DOL).

So far I have heard nothing on the Magnuson/Stevens Act (MSA) and the Exclusive Economic Zone (EEZ) from anyone in the Attorney General’s office. Who in the DOL is willing to sign their name on any document that agrees with this abdication of Alaska’s historic authority in the EEZ.

Alaska has managed non-residents differently than residents in the EEZ for decades with the blessing of NMFS and the NPFMC.

Alaska charges a different fee for non-resident sport licenses than it does for resident licenses. Alaska requires Alaska licenses to fish in the EEZ off Alaska’s coast. The king salmon sport fishermen catch in the SEAK region EEZ comes off the SEAK Pacific Salmon Treaty allocation. This has been the status quo for decades.

Now ADF&G agrees to surrender Alaska state’s rights and Alaska resident priority in the EEZ without a fight. Does this mean that folks who fish in the EEZ won’t need AK fishing licenses? Does it mean that the king salmon caught in the EEZ won’t come off of the SEAK Treaty allocation?

This is why I oppose Proposal 105. **Don’t give up on State’s rights without a fight. Let the court decide.**

Proposal 106 – Support

I support this as a deterrent to the State giving up it’s historic authority in the EEZ without a fight.

Proposal 107 – Support

I support this proposal for the same reasons stated in my comments or Proposals 105 and 106.

Proposal 108 – Oppose

Achieving an 80/20% average by allowing non-residents to go significantly over allocations in some years in this era of predictably low quotas is either a pipe dream or intentional miss-direction. The BOF allowed averaging in the 2023 and 2024 seasons and the sport harvest, predictably, went over Chinook allocation 33,000 kings in those years combined. Why not let Trollers have their historic Spring king fishery back for a cycle to see how many fish they go over allocation.

Proposal 109 – Oppose

Proposal 109 suggests a sport harvest split of 70% harvested before July 1 and 30% after July 1. These percentages are completely arbitrary. Where is the specific language in 109 that will address the non-resident overages. All action is left to the discretion of the Commissioner of ADF&G. It was left to the Commissioner in 2023 and 2024 and yet non resident harvest significantly exceeded allocation.

The stated goal of this Proposal is to manage sport harvest to the 20% allocation after the net allocations are deducted. To do this one needs a base line of how much of that 20% sport allocation was historically caught before and after July 1st. I understand that the proposers have a graph (so far not provided) that demonstrates the % of harvest before and after July 1 but, as we have learned, **harvest is not the same thing as allocation.**

One of the management issues of the current sport KSMP is that it doesn't protect the majority of SEAK resident's access to king salmon during SOC management. This was amply demonstrated in August of 2024 when all SEAK king fishing was closed because guided and bare boat charters as well as other outside waters sport fishermen caught the allocation before inside fishermen had a chance at them. In Juneau and Ketchikan one can't keep a king salmon before June 15. In Petersburg and Wrangell one can't keep a king before July 15.

Contrary to the often made statement from the non-resident sector of the sport fishing industry **2023 and 2024 were not years of low allocation.** They were years of middle range allocation and still the charter harvest was well over their allocation in both years.

Proposal 109 **takes away BOF authority** to set bag and possession limits and cedes this authority to the Commissioner of Fish and Game. Why would the BOF think this is a good idea?

Proposal 110 – Support as Amended by the TSI/ATA RC

Proposal 110 is not perfect. The ATA proposal suffered, as so many other proposals did, from a lack of closely held data that the Department didn't publish until after the BOF Proposal deadline. What this proposal seeks to do is reestablish the language of the Agreement signed by the stake holders in 2022. The proposers of 110 have submitted an RC to the Board that engaged a broad range of stakeholders in its development. ATA and TSI hope this Board will give serious consideration to this RC.

Proposal 111 – Oppose

Averaging 80/20 % between sport and commercial king harvest is a **failed concept.**

Proposal 113 – Oppose

This proposal seeks to increase the sport allocation of king salmon by 5% and reduce the Troll allocation by 5%. Stated in the proposal is; "SEAK sport fishing for king salmon was managed for an average catch of 20% of the all-gear quota (less kings for the net fisheries) for almost two decades. Typically, sport allocation was left unharvested or harvested by other gear groups in high management tiers and the sport took more than 20% in low management tiers..."

The above statement is either not true and/or misstates reality. Tables 5 and 4 (pages 13 and 11) in the most recent "Overview of the Sport **Troll** Fishery for King Salmon in SEAK through 2024 (Special

Publication No. 24-19) contradict the statement. Table 5 has data for the 6 years since the most recent Treaty agreement (2019-2024). These were also years of SOC management.

It is a **myth** that Sport harvest only exceeds allocation in years of low allocation. In **2024**, the **2nd highest** Treaty allocation in the last **8 years**, **sport** took **27%** of the allocation while **Troll** was managed by the Department to a meager **73.8%**. In **2023 sport** harvested **29%** of the allocation while the Department held commercial **Troll** to a paltry **71.8%**. 2023 was the 3rd highest Treaty allocation in the last 8 years. In 2022 all gear groups were below allocation. 2020 was Covid year which depressed charter clientele.

So in the last two years of SOC conservation the guided sport dominated sport harvest increased harvest share when SOC were running. At the same time ADF&G management decreased Troll harvest.

Prior to the 2018 Treaty agreement the sport and the Troll harvest exceeded the 20/80% allocation simultaneously. Table 3 in the Sport Overview covers the years 1999 – 2018. From 1999 - 2008 the Sport/Troll average was 20.3/81.7%. From 2009 – 2018 the average was 21.2/82.7%.

What Proposal 113 attempts to do is burden the Troll sector with all Sport and Troll Treaty reductions as if they should not be part of any conservation effort.

Proposal 115 – Support

Proposal 116 – No Action

I support the Ketchikan BOF AC's RC as a replacement

Proposal 117 – Support but Prefer the TSI/ATA RC instead

Proposal 118 - No Action

The three fish annual bag limit is the status quo . It does nothing to reduce non-resident over harvest. Much prefer the Ketchikan AC's RC

Proposal 119 – Support

Proposal 120 – Support

Proposal 122 – Support

We call this kind of fishing a “Photo Opp Fishery”. Removing a fish one can't or doesn't intend to keep increases incidental mortality. If the fish is close to spawning removing it from water, even if the action doesn't kill it directly, the action reduces the odds of successful spawning.

Proposal 123 – Support

Proposal 124 – No Action

Proposal 125 – Support

If Alaska is serious about bringing back healthy Taku, Chikat, and Stikine Chinook stocks why is the entrance to their migration corridor not protected like the other SOC corridors? Not closing these areas when these concerned stocks are nearing their spawning terminus causes an observer to conclude that Alaska is not serious about protecting these irreplaceable stocks of Chinook.

Proposal 126 – Support

Same as Proposal 125

Proposal 127 – Oppose

I would like to see Alaska residents have more opportunity to harvest king salmon for their tables but it's too early in the Behm Canal Chinook Stocks recovery to risk any directed harvest of these stocks.

Proposal 128 – Oppose

Same as Proposal 127

Proposal 129 – Support**Proposal 130 – Support**

This Proposal seeks to harvest all the Summer Troll king salmon troll allocation in one July opening. The proposal was put forward because in the 2023 and 2024 seasons ADF&G reallocated the historic August troll king harvest by the 85% Alaska resident fleet to a spring harvest by non-resident guided sport clients.

The Department commented on Proposal 130 with this; *“The department OPPOSES this proposal due to the potential increase in incidental king salmon mortalities associated with reducing the overall number of troll king salmon retention days during summer and the potential to alter the stock composition of the catch.”*

This significant change to the summer troll fishery management regime will require discussions at the PSC regarding changes to the stock composition and incidental mortality of the catch. It will increase the risk of exceeding PST limits for incidental mortality resulting in additional fishery management adjustments. The increased harvest levels in July will increase the risk of exceedance of take limits of ESA-listed king salmon.”

Why does the table (Table 130-1) provided in Department Comments leave out data from 2023 and 2024? **It is hard to understand why the Department's comment doesn't also apply to ADF&G moving 33,000 kings from the 2023 and 2024 August (late Summer) troll harvest to the spring non-resident sport harvest.**

Proposal 131 – Support**Proposal 140 – Support**

With amendment that barbless single hooks are only required in areas where/when retention of king salmon is prohibited.

Proposal 141 – Support

There is a plethora of information on the serious negative effects on released salmon caught by using “J” hooks and bait or by mooching. **With king salmon stocks disappearing in much of Alaska why does the department continue to deny this?**

Here is just one statement from the California Department of Fish and Game (CDFG) Ocean Salmon Project;

“...most troll-caught salmon are hooked in the mouth whereas mooched salmon are gut hooked. Onboard observations conducted by CDFG's Ocean Salmon Project (OSP) on commercial passenger

fishing vessels (aka charterboats) during 1993-1995 found that over 60% of the sublegal salmon (<20" total length) caught via mooching with "J" hooks were hooked in the guts or gills. Since studies have found that 80-90% of sublegal salmon hooked in the gut/gills die..."

Proposal 200 – Support

Proposal 201 – Support

JIM DORN, JUNEAU ALASKA, PROPOSAL NO. 156 COMMENTS

Dear Members of the Alaska Board of Fisheries,

I am **OPPOSED to Proposal No. 156 "Reduce Southeast Alaska hatchery permitted pink and chum salmon egg take levels by 25%"** for the following reasons.

Financial Impact on King and Coho Production at DIPAC. I have been sport fishing in Juneau for over 48 years, most recently focusing on the shoreside sport fishery for king and coho released by the Douglas Island Pink and Chum (DIPAC) Hatchery. The shoreside fishery for both king and coho has generally been great since the Douglas Island Pink and Chum (DIPAC) Hatchery started raising and releasing them in the Juneau area. DIPAC's chum salmon returns fund DIPAC's king and coho programs. Cutting chum production at DIPAC would dramatically impact their ability to provide sport and subsistence fishing opportunities for king and coho in Juneau.

DIPAC Chum Salmon Releases not Impacting local hatchery King and Coho returns. DIPAC releases 120-130 million Chum within 40 miles of their Chinook and Coho release sites. Common sense would suggest the king and coho stocks that would be most negatively impacted by such a chum release would be their own king and coho release. Returns for king and coho, as well as for chum, are all doing great in the Juneau area. The chum salmon releases are not negatively impacting the returns of king and coho to the Juneau area.

DIPAC Chum Salmon Releases not impacting local returns of native King and Coho. I also understand the natural runs for king, coho and sockeye on the Chilkat, Chilkoot and Taku Rivers all met their escapement goals. I believe this is partially due to relieving the sport and subsistence harvest pressure on those natural runs due to the opportunities to target DIPAC's king and coho runs. DIPAC's chum salmon releases do not appear to be negatively impacting the natural returns to these rivers.

DIPAC Chum Salmon Releases have occurred for over 30 years without observable negative impact on King and Coho. DIPAC has been releasing chum salmon for 30 years and has been operating the same chum release sites since 1996. If there were significant problems with this management plan negatively impacting chinook and coho returns, it seems like they would have become apparent much earlier.

In conclusion, I am very concerned about the decline in chinook stocks on the Yukon River and fear there may be significant factors such as Bering Sea bycatch, interception, disease, and climate change, that are having a more dramatic impact on the Yukon River returns than elsewhere. I support a rigorous scientific investigation to try and identify the major factors impacting the Yukon returns because this information is important for all of us as we deal with ongoing future impacts to fisheries throughout Alaska.

Thank you,

Jim Dorn, Juneau, Alaska

Submitted by: Morgan Doubleday
Community of Residence: Sitka

Herring is a bedrock pillar for many other fish stocks such as Salmon Halibut and finfish. They should not be taken for roe at spawning or any other time..... I am a life long commercial fisherman and have even participated in the roe Harvest. It seems to have been in major decline over the past decade and needs to be halted before more damage occurs in the scope of many commercial species. Herring is sacred to native peoples in this area for thousands of years. Their knowledge of Herring stocks needs to be known and respected by Alaska Fish and Game. End the Sac roe fishery NOW....



Douglas Island Pink and Chum, Inc.

2697 Channel Drive • Juneau, Alaska 99801
(907) 463-5114 • www.dipac.net

Alaska Dept. of Fish and Game
Alaska Board of Fisheries
Submitted via online form

January 9, 2025

Chair Carlson-Van Dort, Members of the Alaska Board of Fisheries,

RE: DIPAC opposes proposal 156

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit (PNP) hatchery corporation based out of Juneau, Alaska; founded in 1976. DIPAC currently manages two PNP hatcheries in the Juneau area: Macaulay Salmon Hatchery (DIPAC owned and operated, built in 1989), and Snettisham Salmon Hatchery (*State owned* and DIPAC operated, built by the State in 1980 and contractually run by DIPAC since 1996). DIPAC also manages the Ladd Macaulay Visitor Center which welcomes visitors from around the world and has been offering free salmon and marine life education to Alaska's school children since 1990. *The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.*

DIPAC Current Salmon Programs:

DIPAC collects 135 million chum eggs, 1.25 million Chinook eggs, and 1.5 million coho eggs annually at Macaulay Salmon Hatchery (MSH). These egg take goals match MSH's permitted capacity. Current release locations of the three species raised at MSH have not changed since 1990 with the exception of the addition of Lena Cove for Chinook salmon in 2012, and the elimination of various sites over time. At Snettisham Salmon Hatchery up to 9 million domestic sockeye smolt and up to 500,000 domestic sockeye fry are released annually. Also at Snettisham, up to 11 million Canadian sockeye fry are reared and released annually (in the respective lakes their eggs were taken) as a part of the Transboundary River Chapter of the Pacific Salmon Treaty. No pink salmon have been released by DIPAC since 2001, and pink salmon are no longer on DIPAC's permits. See map on the last page of this document for current release goals by species.

DIPAC has no intention or ability to increase chum production goals. The two hatcheries are maxed out on all salmon production and WILL NOT be adding any capacity in the future unless a significant change of heart occurs within the State of Alaska. For production to increase in the future, the State of Alaska Legislature must request DIPAC to expand and to work with the Alaska Department of Fish & Game (ADF&G) to identify a location in which would be suitable to minimize impacts on wild stocks. There also must be a financial ability to take on more production which at this time does not seem feasible. DIPAC has been releasing

approximately 105,000,000 chum salmon fry annually since 1991 with a typical range between 90,000,000 and 115,000,000. Annual variation in release numbers depends on a variety of environmental factors. The two DIPAC managed hatcheries are capped on available water and land use, and have been stable in permitted chum salmon eggtake capacity since 2017. *

Consequences of the Board of Fish taking action on hatchery permitted capacity:

If any version of this proposal were to pass, it would open the door for uncertainty in these programs by setting a precedence that arbitrary cuts (or additions) to hatchery production could occur without thorough review through the stringent RPT scientific and public process.

If this proposal were to pass, it would lead to significant negative impacts on fishing opportunity for all user groups, communities, and stakeholders where hatchery raised salmon are harvested. It would also lead to significant increased fishing pressure on wild stocks in the Juneau area. If this proposal were to pass, DIPAC would likely be unable to contribute the 60% of returning fish to common property fishermen as defined in the Southeast Alaska Comprehensive Salmon Management Plan: Phase 3.

Conclusion:

Alaska's hatcheries have operated with substantial ADF&G oversight and public participation for 50 years. The hatchery operators have been working closely with ADF&G, members of the public, and the greater scientific community to better understand the impacts of these fisheries enhancement programs for the entirety of their existence. ADF&G already takes into account many of the concerns raised by this proposer through the RPT planning process and various ongoing studies to better understand hatchery and wild salmon interactions.

There is currently no sound evidence to support that cutting Alaska hatchery salmon production would lead to a positive change in the ocean for wild salmon or for other ADF&G managed fish species.

Please oppose proposal 156, and continue to allow DIPAC and the other SEAK PNP hatcheries to operate within current permitted capacities, and within the well-established Regional Planning Team (RPT) process, for the sake of all users and communities who rely on hatchery produced salmon.

Thank you for your efforts and time on this complicated issue, and for your consistent concern for the health of wild fish populations. We too have concern for the health of wild salmon and will continue to adjust our practices as necessary (and as well vetted, scientific evidence shows crucial) to ensure the health of salmon in Southeast Alaska for generations to come.

Respectfully,



Katie Harms
Executive Director – DIPAC

--- See below for additional information ---

** DIPAC was able to slightly increase its permitted chum salmon egg take in 2017 from 125 million to 135 million eggs was due to the decommissioning of the inactive University of Alaska - CFOS wet lab that remained on site from the early 1990s through 2015. For more information on DIPAC's dedication to research and education, please see the scholarship page on DIPAC's website for a historical perspective on the program.*

IF A 25% REDUCTION IN CHUM PRODUCTION OCCURRED - DIPAC:

Looking at this simply, not including adjustments to changing market conditions & loss of grant revenue, a 25% cut in chum production could lead to a 25% cut in chum revenue.

PNP Hatchery	Chum Cost Recovery 5 Year Avg.	Assumed Avg. Chum Revenue after 25% cut in Production
DIPAC (no tax)	\$5,471,000	\$4,103,000

Note: This average cost recovery amount includes 3 years in which DIPAC's cost recovery goal was not achieved. The actual reduction in revenue could be significantly less than what is shown here with current market conditions if DIPAC were to have a poor salmon return.

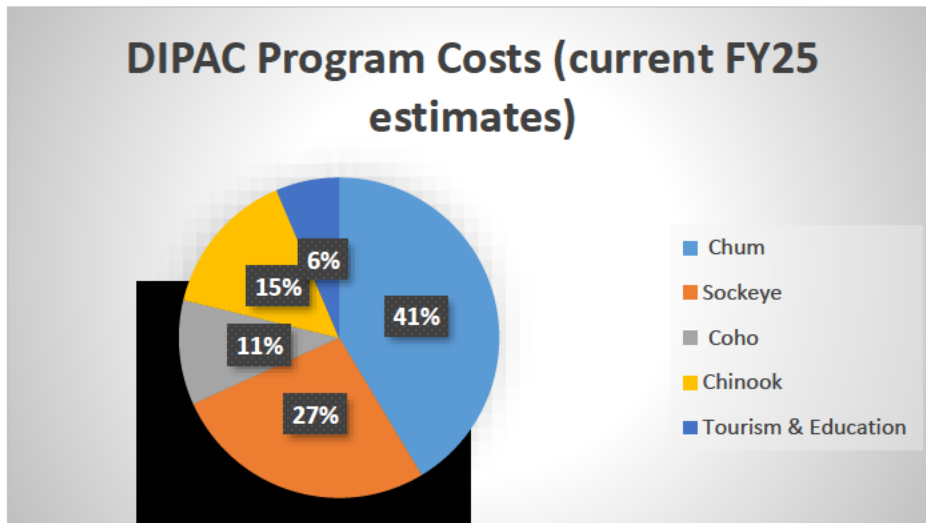
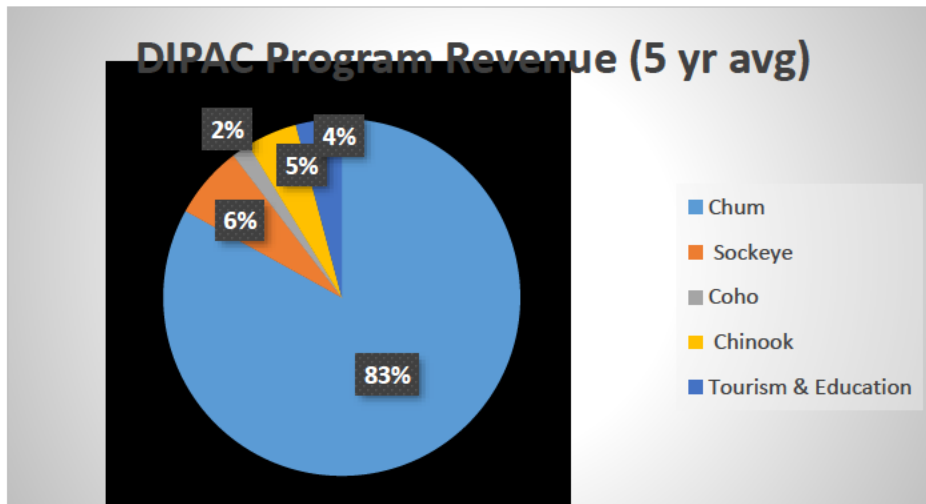
A 25% cut would lead to an existential crisis for DIPAC as a non-profit organization due to the potential loss of key parts of its mission and its likelihood for facing an inability to regularly meet harvest share requirements per the SEAK Comprehensive Salmon Plan. With the above information in mind and DIPAC's program revenue vs expense broken out on the next page, the DIPAC board would be looking for ways to balance the budget. As the chum program covers the shortfalls of all other programs, cuts to the smaller programs would be necessary.

Some scenarios/options to balance the budget include:

1. Cutting one program altogether (all sockeye, all coho, all Chinook, OR all Tourism & Education)
 - a. This option includes DIPAC being no longer able to operate the State owned Snettisham hatchery. This has treaty implications, implications to U.S. personal use fisheries, and implications to the commercial gillnet harvest.
2. Cutting production of certain species or release locations in combination (i.e. eliminating certain release locations and amounts of Chinook, and/or eliminating certain release locations and amounts of coho, and/or cutting production of Sockeye and/or potentially eliminating fry stocking in Sweetheart Lake)
3. Scaling back on free education programs for Alaska school children
4. Eliminating scholarship programs that enable the next generation of fisheries scientists to afford their degree program.

DIPAC Program Costs vs Cost Recovery Revenue

The below table/graphs do not include capital costs, investment earnings or State loans:



DIPAC REVENUE VS EXPENSE SUMMARY 5 yr Average Revenue			
Program	Current Cost*	(including grants) Revenue	Profit/Loss
Chum	\$2,641,000	\$5,471,000	\$2,830,000
Sockeye	\$1,713,000	\$433,000	-\$1,280,000
Coho	\$674,000	\$108,000	-\$566,000
Chinook	\$945,000	\$302,000	-\$643,000
Tourism & Education	\$408,000	\$273,000	-\$135,000

*costs of each program have a percentage of DIPAC's admin, research & evaluation department costs included where applicable.

DIPAC Hatcheries & Domestic Release Locations



Figure provided by DIPAC: Numbers shown are current release goals for each locations. The Macaulay Salmon Hatchery and Snettisham Salmon Hatchery Annual Management Plans on the ADF&G website show actual yearly releases by locations.

Submitted by: Raymond Douville
Community of Residence: Craig, AK

Proposal 113

I OPPOSE proposal 113.

Adjusting the Sport allocation to 25% of the of the king salmon quota will allow the charter fleet to continue over harvesting and growing as a gear group.

This approach will permanently take king salmon away from the troll fleet. This will only harm the troll fleet, as they will never benefit from this plan.

Proposal 131

I OPPOSE proposal 131.

A limited troll harvest fishery would take king salmon opportunity/catch away from fishermen who have historically relied on their ability to harvest more king salmon. This would redistribute these king salmon to permit holders who historically do not catch as many king salmon. This would be unfair because it would take fishing opportunity away from some permit holders who depend on catching more king salmon. Every fisherman is not equal in their ability or capability and that is what makes fishing the diverse industry that it is.

Submitted by: Gregory Duncan
Community of Residence: Wrangell

Re: Proposal 156

Position: Oppose

The proposal to reduce 25% of hatchery chum and pink salmon take (and thus later release) appears to be based on unproven theories that hatchery fish reduce genetic diversity and out-compete wild fish. These theories are not supported by real world experience in river systems outside of Alaska. Policy should be based on observable data and scientific facts--not unproven theories. I propose ongoing study of all the factors responsible for reduction of wild Chinook salmon in Alaska, then implementing policy accordingly. Thank you. Gregory Duncan, B.S., Biology, University of Washington

Submitted by: Patrick Duncan
Community of Residence: Wasilla

I am supporting proposal 156. Massive amounts of chum and pink salmon pumped into the ocean by hatcheries have proven to be detrimental to chinook salmon runs. Chinook salmon may have a slightly lower commercial value than chum or pink salmon but chinook salmon are substantially more valuable to the charter and tourism industries as well as to Alaska residents. The board would fail in their duties to Alaskans were they to oppose this proposal.

Submitted by: Michael Dunn
Community of Residence: Sitka

I'm a SE Alaska troller, for every dollar a Troller makes their community makes \$4. I live in Sitka and raise my daughter here. The last two seasons when the sport sector was catching too many kings we didn't even have a second king opener, it doesn't make sense. That king opener saves many folks season and with our low abundance of winter kings this year, I am a financial desert. I don't understand how people who are allowed to fish all year round in all locations get to take our quota when we are relegated to fishing small areas for the majority of the yr. the only time we can fish outside waters for kings is during the two summer openers, aside from that we're crammed into small areas all trying to make a living. It doesn't make sense to continue to take from the folks who want to preserve/conserves the fish and give it to people who, for a large part, are unchecked and shipping out pallets and pallets of "sport caught" fish daily. We have no idea how much fish is actually going out of state to out of state sport anglers. if you wish to reduce our catch more and regulate us (commercial trollers)

more, you should stay consistent and also start parking enforcement officers at airports to check "sport caught" fish boxes being shipped out of state.



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

Dear Members of the Alaska Board of Fish,

My name is Haley Janttie, I am the general manager of Eagle Charters located in Elfin Cove, AK. Thank you for taking the time to consider the effect of the following proposals.

Proposal 108: Support	Proposal 114: Oppose	Proposal 119: Oppose
Proposal 109: Oppose	Proposal 115: Oppose	Proposal 120: Oppose
Proposal 110: Oppose	Proposal 116: Oppose	Proposal 125: Oppose
Proposal 111: Oppose	Proposal 117: Oppose	Proposal 126: Oppose
Proposal 140: Oppose	Proposal 141: Oppose	Proposal 203: Oppose
Proposal 207: Support	Proposal 208: Support	Proposal 210: Oppose

Oppose Proposal 109, 110, 111, 114, 115, 116, 117, 119, 120, 125 and 126: If implemented, these proposals would have significant negative impacts on the sport fishing industry and related businesses in Southeast Alaska. The sport fishing industry is a cornerstone of the region's economy, and if implemented these proposals could be detrimental to both the stability of local businesses and the livelihoods of those dependent on this sector.

The proposed reduction in nonresident annual king salmon limits, particularly during the critical period from mid-May to mid-July, would be detrimental to our business. King salmon are foundational to our operations, especially in June, when there are limited opportunities to target other species. June has historically been one of the peak months for bookings, but with increasing regulatory uncertainty, demand for this period has diminished, making it harder to secure reservations. Reducing king salmon limits during this time would further limit our ability to market to nonresident anglers, severely impacting our business.

A reduction in the annual king salmon limit or a restriction on harvestable fish during the peak season would result in a significant loss of business, reducing the length of our operational season by half. This not only threatens the sustainability of our lodge but would also have a cascading effect on the broader community and economy. Our business supports many local suppliers, including those providing food, fuel, equipment, transportation, and employing residents, all of whom would suffer from a decline in our operations.

In addition, day closures within the king salmon sport fishery would further exacerbate the uncertainty and instability that already exist. For businesses like ours, which depend on predictable fishing opportunities to plan and execute our operations, any further restrictions would create an environment of doubt and inconsistency, discouraging customers from booking their trips. The resulting lack of trust in the sport fishing sector would harm our business and have a ripple effect throughout the region.



The sport fishing lodges in Southeast Alaska, serve as the primary means of recreational access for nonresident anglers and have been experiencing increased uncertainty due to fluctuating fishing regulations. Our customers increasingly express concerns about the instability of fishing seasons, with many lifelong clients stating they will not return due to the unpredictability surrounding regulations. This erosion of customer confidence is impacting our ability to operate effectively. To ensure the long-term stability of sport fishing businesses in Southeast Alaska, it is crucial that we maintain consistent and reliable opportunities for anglers.

Support of Proposal 108: I support Proposal 108 as it reinstates essential provisions of the Southeast Alaska King Salmon Management Plan, which are critical for maintaining stability in both the commercial and sport fisheries. This proposal offers a balanced approach that enables uninterrupted sport fishing for king salmon while also ensuring that harvest limits are managed effectively to avoid exceeding the annual harvest ceiling. The objective to achieve an average harvest of 20 percent of the annual harvest ceiling helps to ensure a sustainable allocation for both sectors. Furthermore, the proposal includes provisions for minimizing regulatory restrictions on resident anglers and allows for inseason transfers from the troll fishery to the sport fishery, ensuring flexibility in management while respecting harvest limits. Importantly, the proposal also includes measures to manage the nonresident harvest when the sport fishery harvest exceeds 22 percent over consecutive years, providing a necessary safeguard for long-term resource sustainability. This proposal advocates for a well-rounded management plan that fosters both stability and sustainability, ensuring fair and equitable access for all stakeholders while protecting the health of the king salmon population.

Oppose Proposal 140 & 141: Mandating the use of barbless hooks would increase stress and potential injury on a fish. This would result in increased harm and mortality while decreasing an angler's success rate therefore increasing the opportunity to harm more fish than are successfully landed and kept. Banning baited hooks unnecessarily restricts anglers' ability to fish in a way that has historically been both effective and sustainable. These proposals may create unwarranted obstacles for both recreational and subsistence fishermen, without clear evidence that such measures are required for resource conservation.

Oppose Proposal 203: If lingcod limits are to be liberalized, they should be applied equally to all nonresident anglers. Any liberalization of lingcod limits should be postponed until research confirms that the population is stable enough to support increased limits for all nonresident anglers, guided and unguided.

I urge you to carefully consider the impacts these proposals would have on the businesses and communities that rely on the sport fishing industry. Thank you for your time and consideration.

Sincerely,

Haley Jantti
Eagle Charters



Alaska Board of Fisheries
 P.O. Box 115526
 1255 W 8th Street
 Juneau, AK 99811

Dear Members of the Alaska Board of Fisheries,

My name is Mike Leboki, I am the owner of Eagle Charters located in Elfin Cove, AK. Thank you for taking the time to consider the effect of the following proposals while deliberating the following.

Proposal 108: Support

Proposal 109: Oppose

Proposal 110: Oppose

Proposal 111: Oppose

Proposal 140: Oppose

Proposal 207: Support

Proposal 114: Oppose

Proposal 115: Oppose

Proposal 116: Oppose

Proposal 117: Oppose

Proposal 141: Oppose

Proposal 208: Support

Proposal 119: Oppose

Proposal 120: Oppose

Proposal 125: Oppose

Proposal 126: Oppose

Proposal 203: Oppose

Proposal 210: Oppose

I am writing to express my opposition to Proposals 109, 110, 111, 114, 115, 116, 117, 119, 120, 125, and 126, as I believe these proposals will have devastating effects on sport fishing lodges in Southeast Alaska, along with the local economies that rely on recreational fishing. These proposals threaten the livelihood of many small businesses, including sport fishing lodges, guides, and related service providers who are integral to the region's economy.

Southeast Alaska has long been a premier destination for anglers. For decades, sport fishing lodges in this area have been vital to both local and state economies, providing jobs, stimulating tourism, and contributing millions of dollars annually through visitor spending on accommodations, charter services, equipment, and dining. The restrictions proposed in these changes would severely limit nonresident access to king salmon.

By severely limiting nonresident access, these restrictions proposed in these proposals will directly affect the ability of sport fishing lodges to operate at a sustainable level. These lodges often operate on tight margins, and a significant decrease in nonresident anglers would lead to fewer bookings, reduced staff hours, and an overall downturn in business. Furthermore, many of these businesses are located in rural communities where economic opportunities are already limited. A decline in sport fishing tourism would disproportionately affect these local economies and the families who rely on the industry.

While I fully support responsible management practices to protect fish stocks, the blanket restrictions proposed would be an overly broad approach that harms both the economy and the long-term sustainability of Southeast Alaska's sport fishing industry. Sustainable practices, including thoughtful conservation efforts, can be achieved through other means without undermining the livelihoods of those in the sport fishing industry.



Additionally, the reputation of Alaska as a world-class fishing destination could be severely damaged. Sport fishing lodges in Southeast Alaska have built a reputation over decades, and many clients return year after year. When nonresident anglers are restricted, the long-term effects on the state's standing as a premier fishing destination could have repercussions far beyond the immediate impacts of these proposals.

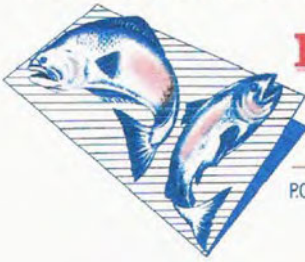
For these reasons, I urge you to reconsider these proposals and I encourage you to consider accepting Proposal 108. The proposal includes the most important factors when considering king salmon management and includes a balanced approach for all user groups. Allowing uninterrupted sport fishing for king salmon while effectively managing harvest limits to stay within the annual ceiling is crucial for our industry. By targeting an average harvest of 20 percent of the annual limit, it ensures a sustainable allocation for both sectors. Additionally, the proposal reduces regulatory restrictions on resident anglers and permits inseason transfers from the troll fishery to the sport fishery, providing management flexibility while adhering to harvest limits. Importantly, it includes measures to control the nonresident harvest if the sport fishery exceeds 22 percent over consecutive years, safeguarding the long-term sustainability of the resource. Overall, the proposal supports a comprehensive management plan that balances stability, sustainability, and fair access for all stakeholders, while prioritizing the health of the king salmon population.

Thank you for your time and consideration.

Sincerely,

Michael Leboki
Owner, Eagle Charters

PRODUCERS AND WHOLESALERS

**E.C. PHILLIPS & SON, INC.***Fresh-Frozen Alaska Seafood*P.O. BOX 7095 • KETCHIKAN, ALASKA 99901 • 907-247-7975 • FAX 907-225-7250 • ecphillips@ecphillipsalaska.com

Paul Cyr

General Manager

EC Phillips & Son

PO Box 7095

Ketchikan AK 99901

paul@ecpalaska.com

Date: 1-13-2025

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

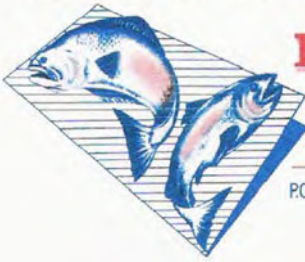
Dear Members of the Alaska Board of Fisheries,

I am writing to formally **oppose the proposed 25% reduction in hatchery egg take levels for pink and chum salmon in Southeast Alaska, as outlined in Proposal 156**. As a business that relies on the cost-recovery program for its continued operation, EC Phillips & Son believes that this proposal could have severe and far-reaching consequences not only for our business, but also for the broader fisheries sector, including efforts to alleviate pressure on wild salmon stocks.

Our business, like many others in Alaska's fishing industry, depends heavily on the cost-recovery opportunity provided by hatchery programs. These programs are critical for offsetting operating costs, particularly in lean years. The proposed reduction in hatchery egg take levels would significantly limit our ability to access fish through these cost-recovery mechanisms, putting our business at risk and threatening jobs within our community.

Hatchery operations are a vital tool for supplementing and supporting the resource, particularly in the face of increasingly strained wild populations. As wild stocks, continue to face challenges from climate change, disease, bycatch, and other factors, it is imperative that we utilize all available tools, including hatcheries, to maintain healthy salmon populations and ensure the sustainability of our fisheries.

PRODUCERS AND WHOLESALERS

**E.C. PHILLIPS & SON, INC.***Fresh-Frozen Alaska Seafood*P.O. BOX 7095 • KETCHIKAN, ALASKA 99901 • 907-247-7975 • FAX 907-225-7250 • ecphillips@ecphillipsalaska.com

In this context, hatcheries are not just a tool for production—they are a critical part of an integrated approach to fisheries management. Rather than reducing hatchery egg take levels, we believe that the focus should be on ensuring that Alaska's hatcheries remain viable, efficient, and effective in supporting both the resource and the industry. By maintaining hatchery production levels, we can help alleviate some of the pressure on wild stocks by supplementing salmon numbers.

A reduction in hatchery egg take levels, risks undermining the economic viability of many small- and medium-sized PNP Hatcheries. We strongly oppose a reduction in hatchery egg take levels, which could inadvertently place additional strain on the resource and the industries that depend on it.

We urge the Board to consider alternative approaches that balance the need to support wild salmon populations with the reality that viable hatchery programs are necessary for maintaining the economic and ecological health of Alaska's fisheries. Rather than reducing egg take levels, we suggest the Board work collaboratively with stakeholders to explore ways to enhance hatchery practices, improve monitoring and management.

Thank you for your consideration of our position. We ask that you reject Proposal 156 and find a solution that supports the long-term sustainability of Alaska's fisheries, the viability of businesses like ours, and the health of wild salmon stocks.

Sincerely,

Paul Cyr

General Manager

EC Phillips & Company

Submitted by: Paul Cyr
EC Phillips & Son Inc.

Community of Residence: Ketchikan

Opposed: 156

Dear Members of the Alaska Board of Fisheries,

I am writing to formally oppose the proposed 25% reduction in hatchery egg take levels for pink and chum salmon in Southeast Alaska, as outlined in Proposal 156. As a business that relies on the cost-recovery program for its continued operation, EC Phillips & Son believes that this proposal could have severe and far-reaching consequences not only for our business, but also for the broader fisheries sector, including efforts to alleviate pressure on wild salmon stocks.

Our business, like many others in Alaska's fishing industry, depends heavily on the cost-recovery opportunity provided by hatchery programs. These programs are critical for offsetting operating costs, particularly in lean years. The proposed reduction in hatchery egg take levels would significantly limit our ability to access fish through these cost-recovery mechanisms, putting our business at risk and threatening jobs within our community.

Hatchery operations are a vital tool for supplementing and supporting the resource, particularly in the face of increasingly strained wild populations. As wild stocks, continue to face challenges from climate change, disease, bycatch, and other factors, it is imperative that we utilize all available tools, including hatcheries, to maintain healthy salmon populations and ensure the sustainability of our fisheries.

In this context, hatcheries are not just a tool for production—they are a critical part of an integrated approach to fisheries management. Rather than reducing hatchery egg take levels, we believe that the focus should be on ensuring that Alaska's hatcheries remain viable, efficient, and effective in supporting both the resource and the industry. By maintaining hatchery production levels, we can help alleviate some of the pressure on wild stocks by supplementing salmon numbers.

A reduction in hatchery egg take levels, risks undermining the economic viability of many small- and medium-sized PNP Hatcheries. We strongly oppose a reduction in hatchery egg take levels, which could inadvertently place additional strain on the resource and the industries that depend on it.

We urge the Board to consider alternative approaches that balance the need to support wild salmon populations with the reality that viable hatchery programs are necessary for maintaining the economic and ecological health of Alaska's fisheries. Rather than reducing egg take levels, we suggest the Board work collaboratively with stakeholders to explore ways to enhance hatchery practices, improve monitoring and management.

Thank you for your consideration of our position. We ask that you reject Proposal 156 and find a solution that supports the long-term sustainability of Alaska's fisheries, the viability of businesses like ours, and the health of wild salmon stocks.

Sincerely,

Paul Cyr
General Manager
EC Phillips & Company

PC148

Submitted by: Paul Cyr
EC Phillips & Son Inc.

Community of Residence: Ketchikan

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to provide input on the Sitka herring proposals under consideration. As a supporter of sustainable fisheries management and advocate for the rights of commercial fishermen, we respectfully submit our positions on Proposals 178-190.

Proposals Opposed

Proposal 178: Declaring Sitka Sound a herring reserve infringes on the rights of Alaskan fishermen, including many Alaskan Native families, and unfairly targets a specific gear group. This proposal prioritizes tourism interests over a critical local lifestyle and violates federal regulations by encouraging interference with marine mammals and commercial fisheries.

Proposal 179: Closing the Promisla area to commercial fishing is unnecessary. The Alaska Department of Fish and Game (F&G) already effectively monitors subsistence harvesters and regulates commercial fisheries. There is no evidence linking commercial fishing to decreased subsistence harvests.

Proposal 180: Limiting Sitka Sound sac roe fishery test sets to three per day will extend fishing timelines, waste resources, and increase costs for fishermen, the industry, and the state. This restriction also limits opportunities to identify and fish in the most environmentally responsible areas.

Proposal 188: Introducing consecutive time limitations and requiring line-of-sight observer monitoring will burden fishermen and the state with unnecessary expenses. These measures could force fisheries closer to shore, causing unintended consequences. Instead, regional management by area is a more effective approach.

Proposal 189: Reducing herring seine net size will lead to inefficiencies, requiring longer fishing times and increasing catch-and-release practices. Smaller nets risk missing larger biomass of target fish and intensifying pressure on less suitable schools, resulting in greater environmental impact.

Proposal 190: Co-management of herring fisheries with tribal governments would hinder the state's ability to efficiently manage these resources. While collaboration is essential, granting disproportionate control to entities that may jeopardize the fishery is concerning.

Proposals Supported

Proposals 184, 185, and 186: These proposals address the challenges fishermen face in the herring spawn on kelp fishery. As participants must travel further distances, these adjustments are necessary to ensure the fishery remains viable and accessible.

Conclusion

We urge the Board of Fisheries to carefully consider the significant economic, cultural, and environmental impacts of these proposals. Sustainable and balanced fisheries management is essential to preserving the livelihoods of Alaskan fishermen and the communities they support. We respectfully request that the Board oppose Proposals 178, 179, 180, 188, 189, and 190, and support Proposals 184, 185, and 186.

Thank you for your time and consideration.

PC148

Submitted by: Paul Cyr
EC Phillips & Son Inc.

Community of Residence: Ketchikan

Dear Members of the Alaska Board of Fisheries,

I am writing on behalf of EC Phillips & Son in strong support of the following proposals, which aim to protect and conserve our Chinook salmon stocks and ensure sustainable management practices in Southeast Alaska's fisheries.

Proposal 140: Sport Fishing - Use of Single Barbless Circle Hook

Proposal Summary:

Sport fishing may only be conducted with a single barbless circle hook between April 1 and June 14, outside hatchery THA zones.

ECP Position: Support

We fully support Proposal 140, which mandates the use of a single barbless circle hook per line for sport fishing between April 1 and June 14. This requirement is a small but crucial step toward improving the survival rates of Chinook salmon, which are currently designated as Stocks of Concern. Circle hooks are a proven method of reducing harm to fish during catch-and-release practices, especially when combined with barbless hooks. Catch-and-release “photo op” practices are harmful to salmon, as the disruption of their protective slime coating increases mortality rates. Implementing this proposal will help protect these vital fish populations during a critical time of year.

Proposal 141: Prohibition of Bait in Sport Fisheries

Proposal Summary:

Prohibit the use of bait in sport fisheries between April 1 and June 14 outside hatchery THA zones.

ECP Position: Support

We also support Proposal 141, which would prohibit the use of bait in sport fisheries targeting Chinook salmon from April 1 to June 14. Baited hooks significantly increase the likelihood of deep hooking, which can cause severe injury or death to the fish. By prohibiting bait, this proposal helps mitigate the negative effects of catch-and-release practices and reduces unnecessary harm to the salmon, thereby contributing to the long-term conservation of Chinook stocks.

Proposal 109: 5 AAC 47.055 – Southeast Alaska King Salmon Management Plan

Proposal Summary:

This proposal seeks changes to the Southeast Alaska King Salmon Management Plan, prioritizing the local fishing community and sustainable management practices.

ECP Position: Support

We support the changes proposed under 5 AAC 47.055, which prioritize the needs of the Southeast Alaskan troll fleet and resident fishermen. As a local company based in Ketchikan, we believe the Commissioner's focus should be on supporting these key stakeholders who depend on sustainable salmon populations for their livelihoods. This proposal aligns with our values and the region's long-term economic and environmental health.

Proposal 110: 5 AAC 47.055 – Southeast Alaska King Salmon Management Plan (Restoring 2022 Stakeholder Agreement)

Proposal Summary:

Restores the original 2022 Stakeholder Agreement between Territorial Sportsmen Inc. (TSI), Alaska Trollers Association (ATA), and Southeast Alaska Guides Organization (SEAGO), eliminating the Sunset Clause and aligning with new Pacific Salmon Treaty (PST) requirements.

ECP Position: Support

We strongly support Proposal 110, which restores the original 2022 Stakeholder Agreement, eliminates the Sunset Clause, and ensures compliance with the updated requirements of the Pacific Salmon Treaty (PST). The changes made by RC 063, which removed limits on non-resident annual sport harvests and eliminated in-season management of the fishery, significantly undermined years of careful negotiation. By restoring the 2022 agreement, this proposal will help stabilize the region's sport fishery management practices, ensuring they remain fair, sustainable, and in alignment with both local and international conservation efforts.

Conclusion

The proposals outlined above are vital to ensuring the sustainability of our Chinook salmon populations and the long-term health of Southeast Alaska's fisheries. We urge the Board to adopt these proposals as they are critical for maintaining the delicate balance between economic, cultural, and ecological priorities in our region.

Thank you for your time and consideration. Please do not hesitate to contact me with any questions or for further discussion.

Submitted by: Franklin Eccher
Community of Residence: Sitka

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

Alaska Rainforest Adventurers, Inc.

PO Box 19568
Thorne Bay, AK 99919

Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

January 13, 2025

Dear members of the Board of Fisheries,

I am David Egelston, the owner and captain of the above named charter business on the inside waters of Prince of Wales Island. I will try to keep my comments short as I understand you will be receiving many opinions from various groups.

I will be marking my opinions on the website for over 50 proposals, but want to touch on a few of the more important ones to me and my business here.

Oppose

109 – In season management of King salmon
110 – In season management of King salmon
114, 115, 116, 117 – reduces non-resident annual limits
119, 120 – two day per week king closure
140, 141 – mandates barbless circle hooks, no bait

Support

108 – modify king salmon management plan
113 – 75% trollers, 25% charter
121 – ADF&G proposal changes sunset date
223 – Increase the tunnel opening for shrimp pots by one inch
262 – close Dungeness crab in Thorne Bay except for personal use

King salmon are very important to my charter business. Being in inside waters I am unable to fish for kings until mid June. That immediately puts me behind the eight ball. For clients who really want to fish for kings, I have to trailer my boat to the outside waters, launching in Craig over an hour away and at increased cost to clients. The early fishery there on that side is especially important before the silvers come available to us later in the season. Not having a substantial number of kings available to harvest would hurt the charter fleet very badly.

The recreational allocation is very small compared to others in the fishery. In years when there is low numbers of king salmon, the charter component is simply too small. If fishermen

cannot come to SE Alaska and catch salmon while they are here, it is hard get them to come at all and certainly not to return.

In years of higher numbers of king salmon the recreational side of the fishery cannot catch it's allocation. That gives trollers the ability to "mop up" the remaining kings that the recreational fishers cannot catch. In the end it evens out over time and both groups end up on average realize the 80/20 split. Although both groups might grumble about wanting more of the pie, it would seem that if both groups are not fully satisfied then a good compromise has been made.

Beyond the personal impacts of not having enough king salmon for my business, the impact on communities on Prince of Wales Island and other areas of Alaska is immense. For such a small part of the fishery, charter boats have an inordinate impact on the communities they operate in. Although I am smaller than many operators the taxes I pay to the City of Thorne Bay are important. Clients come from around the country and depend on local float planes, fixed wheel planes and/or ferries to get to the island. They often rent cars either in Ketchikan or on Prince of Wales. I do not offer lodging, so other local businesses directly benefit. The local markets, liquor stores, gift shops, restaurants, gas stations and other service businesses are also directly benefited. They all pay taxes as well. The fishers purchase fishing licenses and king stamps supporting ADF&G. King salmon are a major draw to get them here and support our communities and state.

Beyond the king salmon management issues discussed above, I would like to comment on two more proposals that are important to me and my family as individual residents of Alaska.

Proposal 223 would increase the tunnel opening size in Southeast by one inch, from 15" perimeter to 16". That is important as we would not need to reduce the tunnel openings of pots we purchase that are otherwise legal in the rest of the state.

Proposal 226 limits the harvest of Dungeness crab to a personal use fishery. In the last BOF cycle both Coffman Cove and Whale Pass were successful in having the same limits applied to their immediate areas. The reason this is important is that there are not enough crab to be had for residents. For years Thorne Bay has had a reduced limit of 5 crabs per resident due to low numbers in the bay. Even with that it sometimes takes days or a week to catch five crabs. We are home to a number of lodges and self guided fishers in skiffs that pound the crab during the season. They often take sub-legal sized or female crabs.

Residents of the city are asking that the Dungeness crab fishery become personal use only in the small bay to increase the availability of crab for our use.

Submitted by: Jeff Ehlen
I guide at Waterfall Resort

Community of Residence: Isabella, Minnesota

I am Jeff Ehlen Skipper at Waterfall Resort located on Prince of Wales Island west of Craig, Alaska. Thank you for your time and interest related to the proposals, you will , deliberate on that will affect the region.

I support proposal 108 SEAGO's proposal

I oppose proposal 109 through 120 minus proposal 113 which I abstain.

The King salmon proposals that suggest lower limits annually for non-residence would have a negative impact on many. For example

1. Float plane companies
2. Taxis/shuttles
3. Grocery suppliers
4. Hotels..... Etc. etc. etc.

Our early king season limit is very important to many. The decreased length of halibut that we can retain also the decreased length of lingcod that we can retain , also the elimination of yellow eye and the decreased species of rockfish that we can harvest. All these changes in regulations has made it difficult for us Throughout the season. If the king salmon is decreased to one annually, that will tie our hands even more.

It's my opinion that lowering the king limit will end up hurting the king salmon population.

To explain;

During my eight years of guiding in Southeast, I've noticed the guest favorite fish to hook into is the king salmon regardless of the size.

When the limit is three kings for the year, most guests are eager to put a legal size fish in the box. Most trips are 2 half days and two full days. The first half is a training day, and most are happy to put any fish in the boat. The first full day, we target Kings as well as the second full day, and with the limit at three annually, they are happy to put legal size kings in the boat. Very few kings are released if they are of legal size they are harvested. We usually leave one spot open the third king for a bigger one, but as their time in Alaska grows short many are just happy putting their third salmon on the boat. When the limits go to one annually, the guest know they only have one chance for a big king, hence the amount of Kings released increases dramatically. As we all know, king salmon fight until they die, so releasing them, ends up being a waste of a resource. It's obvious to me when I release kings that not many survive.

So it's my belief that by leaving the limits at three annual it would be a benefit to the salmon population thus benefiting everyone connected with the industry.

Thank you for your time sincerely, Jeff Ehlen



Alaska Board of Fisheries
 P.O. Box 115526
 1255 W. 8th Street
 Juneau, AK 99811-5526

As a lifelong Alaskan who built our family business El Capitan Lodge from the ground up over 37 years ago, I want to clearly state my concern for the future of my business and others in my industry. Due to the continuous lowering of sportfish limits our industry is on the brink of failure. Anglers come to Southeast Alaska from all over the U.S. to have the opportunity to catch & retain King Salmon & Halibut. In 2024 our May and June guests could retain one King Salmon & one Halibut each day on three-day packages. During the months of May and June, if our industry is unable to retain one King Salmon each day and three annually, it will very likely end our King Salmon season permanently. Approximately 95% of our guests are on a three-day fishing package and they travel many miles and spend a great amount of money getting to and from Alaska. If guests are told that they are buying a three-day fishing experience and on one of the days they are unable to retain a King Salmon and on another day they are unable to retain a Halibut, guests will stop fishing in Southeast Alaska in May and June. May and June will have very limited retention opportunities and thus become of very little value to any guests seeking to catch and retain Halibut and King Salmon in Southeast Alaska. We all sell fish retention opportunities and a fish limit that is zero is a zero retention opportunity.

Due to potential regulations the 2025 three-day retention could be: 2 King Salmon, 2 small Halibut, 1 Lingcod, & 15 Rockfish

Traveling to Alaska for two King Salmon and quite possibly two small Halibut (if day closer is implemented) on a three-day fishing experience is a not realistic product of value to most anglers. Spending \$1,500 per day plus the cost of travel to Alaska totals up to about \$5,600 per angler. I have no doubt that retaining only two King Salmon and two small Halibut on a three-day trip will be the straw that breaks the camel's back for our industry. At this meeting the ADF&G board is faced with deciding on many proposals that if implemented could very well be the final nail in the coffin of the Southeast Alaska guided charter industry.

It's well overdue that the state and this board recognize the true value of the Southeast Alaska charter industry. In the recently completed McKinley Research Group report it is estimated that our industry brings \$271 million of spending to the Southeast Alaska region annually. In a world where there is so much concern over "the best use", or the "greenest" use of a resource I must point out that the charter sector is able to bring this enormous economic benefit to Southeast Alaska as the LOWEST for-profit user of the Halibut & King Salmon resource.

Please disregard any false claims from other sector participants making accusations that they know what our industry can survive on, claiming we can continue to operate on a partial season or on fewer fish retention. Due to such a short season established operators in the lodge & charter business typically survive on a 100% capacity business plan. To accomplish this, it requires a minimum number of fish each day to market our fishing experiences. Any limit of less than one fish per day is zero. Again, anglers don't seek out and pay for Alaskan fishing trips to not have an opportunity to retain at least one Halibut or King Salmon each day on three day fishing trips in May & June.

The charter industry has traditionally been managed to a 20% AVERAGE of the King Salmon quota. The 20/80 split has been in place for decades and during this time the charter industry was never limited to growth, therefore we now have substantially more participants in the guided charter sector. How did the state set an allocation split for a user group 30 years ago, never attempt to limit the growth, and then still expect the sector to survive on the same allocation split after 30 years of unlimited growth? At this point it should be no surprise that our industry can no longer be sustainable with 20% of the King Salmon allocation. I think it's time for the board to realize that a 20% allocation split is no longer sufficient to sustain the robust southeast charter sector. It's quite possibly time to acknowledge that the 80% share the troll sector holds may no longer be reasonable and does not meet the board's criteria for managing allocation splits between different user groups, specifically because of the following requirements.

1. "The importance of each fishery to the economy of the state"
2. "The importance of each fishery to the economy of the region and local area in which the fishery is located"
3. "The importance of each fishery in providing recreational opportunities for residents and nonresidents"

Sincerely,

Scott Van Valin
 Owner- El Capitan Lodge

PO Box 1174, Craig, AK, 99921

Submitted by: Stacy Eldemar

Community of Residence: Juneau, AK; Línígít Aaní - Sheet'ká Kwaan

I am recommending the Board of Fish select elements of proposals 173 through 177 which may provide the greatest protection for spawning herring by increasing the minimum threshold; reducing the harvest rate; and establishing a maximum cap on the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and also to prevent development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for Tribal citizens by establishing a co-management framework. I also strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

I am in opposition of proposals 182 and 183 to expand access of commercial permit holders to herring in Sitka Sound.

Submitted by: Jorgen Eliason

Community of Residence: Sitka AK

Jorgen Eliason

Eliason Fisheries LLC

Sitka AK

Seiner/troller

I am writing to voice my extreme opposition to proposal 156! I believe a cut in hatchery production would be a major hindrance on my business and all other SE fisherman.

I am also opposing proposal 167. I do not think this is necessary and will only cause problems while fishing in tight quarters with other vessels.

I am in support of proposal 168.

Submitted by: Joseph Emerson
Community of Residence: Juneau

Dear chair Carson-Van-Dort and Board Members, my name is Joe Emerson. I am a commercial salmon troller and owner of a wholesale/retail seafood business. My business sells and delivers troll and longline caught seafood throughout the lower 48 states. My business delivers Alaskan Chinook salmon to customers doors by way of online orders from our website shorelinewildsalmon.com. Deliveries are made using FedEx and UPS.

I am a resident of Juneau. Four generators of my family have been involved in commercial fishing throughout coastal Alaska. My father was a troller, my son is a troller, my grandson a troller deckhand. My family came to Juneau in 1898.

I would like to express my support for proposals #109 and #110. I also support proposal s #111,112 and 114. It is extremely important to my business that a greater and more consistent harvest opportunity for Chinook salmon is provided for the commercial troll fishery in the future. Chinook salmon comprises the bulk of our sales . Our fish are all caught in SE Alaska and processed in Pelican and Petersburg Alaska. Our business provides numerous jobs in the processing, transportation/shipping and cold storage sector in both Pelican,Petersburg and Juneau. My business Shoreline Wild Salmon also provides salmon to the local grocery stores in Juneau and Haines Alaska. With the decline in the Chinook quota of the years we are struggling to create enough inventory to supply the public's demand for high quality Chinook and Coho salmon. Any reduction in commercial harvest opportunity would probably end my business. We are holding on by shoestring as it is.

I also strongly oppose proposals #108 and#113 or any other proposal that seeks to take Chinook Salmon away from the resident commercial troll fleet and reallocate to the guided sport fishery. Pelican Alaska is my base of operations. Very few of the Lodge and Charter boat operators in Pelican or Elfin Cove are residents of Alaska. During the winter Pelican becomes nearly a ghost town as lodges close and guides return to the lower 48. I think it unwise for Alaska to allocate more of its finite fishery resources to primarily non resident sport fisherman. Our rural towns are struggling and a dependable income for rural fisherman needs to be maintained for us to have a future.

Sincerly, Joe Emerson

[REDACTED]

Juneau, AK [REDACTED]

[REDACTED]

Thomas Emerson
F/V Natalee K – SEAK Power Troll
[REDACTED]
Juneau, AK [REDACTED]
1/14/2025

Alaska Board of Fisheries
Via electronic submission.

Dear Alaska Board of Fisheries Members,

My name is Thomas Emerson, I am writing in **strong support of proposal 110, and related RC amendments. I strongly oppose proposals 108 and 113, and 156.**

The current management plan and implementation is misaligned with allocation goals. The 80/20 sport allocation goal will not be able to be met under the current regime as the non-resident sport sector continues to grow.

I would encourage to you review the figures from the last two years under the current management regime. For 2023, the sport sector overharvested their preseason allocation by 45% ¹. In 2024, this figure dropped to 35% ¹, but only after taking drastic management action by closing the entire sport fishery from August 26 -September 30th. During this time all anglers were harmed. Both residents looking for recreation and subsistence for their families, as well as visitors who happened to plan their proverbial once in a lifetime trip in the later part of the summer, not to mention the trollers who were not allowed the opportunity for an August king salmon opener based on the sport sector overage. This is not a sustainable management plan. We need a plan that can allow for reasonable bag limits that do not allow for the coastal lodges to exploit the resource at the expense of resident fisherman, trollers, and inside water-based charter lodges alike.

All indicators point to the growth in the number and effort of non-resident anglers as driving these overages. See attached graph following comments to see the trend in full view. The last few years of figures from the Statewide Harvest survey indicate the non-resident percentage of harvest approaching or over 70% of the total harvest. Over the last 5 years (2019-2023) it has averaged 67% ³.

In 2023 the guided charter sector alone harvested 35,396 fish ². The preseason allocation of treaty king salmon for the entire sport sector was 38,039 fish. It is not a workable plan to have the guided charter anglers alone consume the vast majority of the planned quota for the entire sport sector.

Without the closure in August, one might extrapolate that the sport sector in total would have surpassed their preseason harvest allocation by a greater percentage than in 2024.

I would encourage you to support any action that will allow the department to reasonably manage and maintain the historical 80/20 split between the troll and sport sectors, while maintaining a resident fishery priority. **I believe proposal 110 and related RC amendments represent this solution.**

Thank you for your service and consideration to this matter.

References:

1:

Year	Troll Allocation	Sport Allocation	Troll Harvest	Sport Harvest	Troll Deviation	Sport Deviation	Troll Deviation % (Calculated)	Sport Deviation % (Calculated)
2023	152,154	38,039	136,579	55,129	(15,576)	17,107	-10%	45%
2024	156,143	39,036	143,955	52,759	(12,188)	13,723	-8%	35%

Source: *Special Publication No 24-19 - Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries*
 Abridged Data From Page 13, Table 5: Harvest of Treaty King Salmon and Commercial Troll and Sport Overage and Underage Calculations under the 2019-2028 PST agreement.

^{2:} Page 38: *Special Publication No 24-19 - Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries*
 Graph Shown on Page 38

^{3:}Page 34: *Special Publication No 24-19 – Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries.*

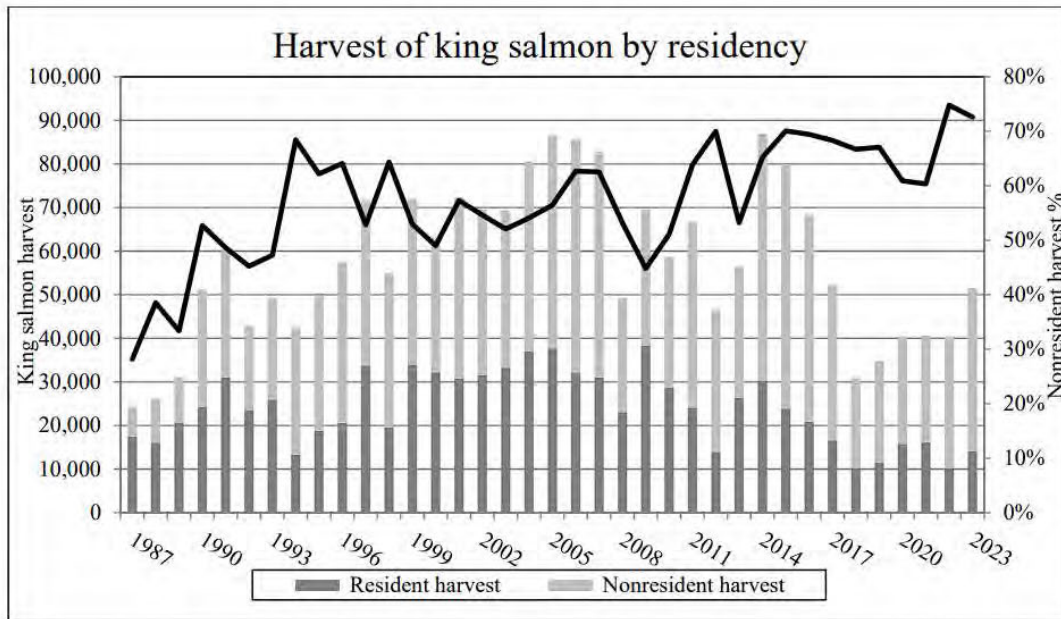


Figure 7.—Estimated harvest of king salmon by resident and nonresident anglers in Southeast Alaska, 1987–2023, as determined from the Statewide Harvest Survey (SWHS).

Source:

Special Publication No 24-19 - Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries
 Graph Shown on Page 38

Submitted by: Jon Emmons
Community of Residence: Sitka

I urge the Board of Fish to support proposals 173, 174, 175, 176 & 177 which would provide the most protection to spawning herring by increasing the minimum threshold, while reducing the harvest rate, and establishes harvest cap for the commercial sac roe herring fishery. This would prioritize subsistence harvest and minimize the development of high volume or non-food herring fisheries in Sitka Sound.

Also I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework, it just makes sense period. Along with my full support for proposal 179 to protect an much needed subsistence harvest area as well as proposal 181 to minimize herring mortality, triggering false spawn, undue stress & damage, and disruption of natural range caused from test sets.

Thank you for your time and consideration.



Holly Enderle
F/V Pacific Dream (Power Troller)

Dear Chair Carlson-Van Dort and Board Members,

First off, I would like to extend my gratitude and appreciation for your service and time spent on the board helping to conserve and sustain Alaskas fisheries.

My name is Holly Enderle, this fall I joined the Elfin Cove Fish and Game Advisory Committee board. I am a 37 year old, second generation Powertroller based out of the rural community of Elfin Cove, Alaska and spend my winters in Haines, AK. I grew up fishing with my father who began trolling in 1974, he passed his many years of knowledge and respect for the fishery down to me. To me it seemed like a beautiful way to make a living, connected to nature and balance, high quality over quantity, sustainable- I decided to take the plunge and start my own small business. I purchased a 38ft fiberglass boat and limited entry permit.

For the past 15 years trolling has been my main source of income. More than that though, it has become my true passion and love for life. I think the best part of my job has been training and empowering other young women as my crew. Sadly though, I can no longer afford to hire a

crew due to chinook quota cuts and no promise of a 2nd opener in August when profits are generally higher. I captain my boat alone now, which has become increasingly difficult with the amount of non-resident charter vessels that have taken over the area. The expanding growth of the non-resident sport fishing in the area Elfin Cove and Pelican area is NOT sustainable. True roots Alaskan residents who have made our modest incomes in this sustainable fishery for 100s of years are being penalized and reduced in quota for this. Having kids and raising a family on the boat is a dream that died for me when I started to see how little job security I have left in this career.

I am writing to voice my **STRONG SUPPORT on proposals 109 & 110** with RC amendments. I feel its imperative for the longevity of our fishery and the overall fish stock to maintain the 80% Troll/ 20% Sport Fish, giving ADF&G the ability to manage and shut down both Troll and Sport during the summer season as needed based on current counts and allotment.

I OPPOSE Proposals 108 & 113 The non-resident/charter sector's demand for more King salmon during a time of low abundance ignores the impact of that demand on resident trollers and resident sport fishermen. Low abundance is our likely future. Conservation is Alaska's mandate. Resident fisheries should not suffer to support non-resident harvest. 85% of the Power troll fleet is made up of Alaskan residents who will suffer greatly without in season management and regulation of the ever-growing Sport Fish sector.

Loosing our 2nd king opener two seasons in a row due to the sport fish going over their quota has taken a huge toll on me and my livelihood and I am hopeful that some provisions can be made to prevent this loss in the future. Historically i make around 1/2 my profit on the king opener. My boat isn't set up for other fisheries and i can't afford to buy into any others at this point.

Thank you for taking the time to read this and consider my comments and opinions.

Holly Enderle

Submitted By:
Brooks Areson & Cameo Padilla owner/operators of Equinox



Dear Members of the Board,

We write as owner/operators of a charter business, troll permit and a small block of 2C halibut, with the majority of our annual income being derived from the charter business.

We run 6 pack charters out of our 65' expedition vessel which we also live on in Sitka. Most of our trips are 5-7 days in duration, starting and ending in Sitka, but we also regularly visit Petersburg, Juneau, Haines, Tenakee Springs, Kake, Angoon and other Southeast communities. Guests typically spend a night or two in town at a hotel or rental at the beginning and at the end of the charter.

We provide a variety of services other than fishing such as film/photography, research, hiking and kayaking. Many of our guests don't fish at all, however, the inclusion of salmon fishing is an important component to the viability of our business particularly in early summer. Fresh fish is also the mainstay of meals we serve onboard. Given a possession limit of 2 smallish halibut, of which we can only legally eat a portion of each while onboard, and an annual king limit of 3 for non-residents, we feel that further reduction or restrictions on king salmon would render early summer fishing trips in this area difficult to market.

While closures are an effective and expected management tool in commercial fisheries, in-season management undermines the guided charter sectors' ability to provide customers with reliable and consistent value. Therefore, we would hope the Board would consider a broader timescale when designing management protocols for the guided sport sector.

The limited harvest opportunities currently available to non-residents for lingcod and rockfish preclude them from compensating for further king salmon regulatory action. These fish do offer a valued contribution to our sport fishing experience, but for most they aren't the species to motivate the time and money spent on a trip to Alaska.

In closing, we prioritize sustainability and consistency in any fisheries management action and feel that both the commercial and sport fisheries are critical to maintaining a diversified economy in Southeast Alaska. Thank you for taking our perspective into account as you evaluate proposals this year. We hope the above has given you adequate basis for understanding our positions on proposals listed below.

Brooks Areson & Cameo Padilla, owner/operators of Equinox

Proposal:

- 108 Support
- 109-111 Oppose
- 114-120 Oppose

-With regards to 119 and 120: We fish less than dedicate fishing charters, but due to the nature of our trips, we have less opportunity to fish. In many cases these proposals would be hard for us to work around.

Submitted By:

Brooks Areson & Cameo Padilla owner/operators of Equinox

- 122-123 Support
- 130 Oppose
- 131 - 133 Support
- 134 Support

-We believe the wasted king bycatch and harvested kings are underreported in this fishery.

- 143-144 Oppose
- 159-163 Support
- 164 Oppose
- 169 Support
- 172 Support
- 174 Support
- 183-186 Oppose
- 203 Oppose
- 205 Oppose
- 206-208 Support
- 209-210 Oppose
- 211 Support
- 212-215 Support
- 243 Support
- 250 Oppose
- 253-257 Support



Submitted by: Camden Erickson
Community of Residence: Juneau

230,231

I am here to voice my opinion and show my support about opening a commercial fishery for the magister squid in Alaska. I have grown up sport fishing squid in Chatham straights. From my personal experience, it appears that there is a very large biomass. You can drop a squid jig down just about anywhere and catch squid. I haven't had a single unsuccessful trip targeting these squid. In addition to that, we see them often while commercial fishing for halibut. The magister squid could be a very safe and profitable fishery for residents of southeast Alaska. Although the squid fisheries on the west coast are a swine fishery, they are one of the most profitable commercial fisheries in the USA, and there is no reason that Alaska shouldn't be capitalizing on this resource.

Submitted by: Dennis Evans
Community of Residence: Craig.AK.

108...A 3-2-1 king limit works without hurting the buisness or the resource.

113...this allocation would give us enough kings through most allocation levels.

116 through120...science does not support this..the economic impact would be detrimental to many businesses I AK.

140..141 Science does not support this.

Submitted by: Dave Evens
Community of Residence: Petersburg

My opposition to proposal 156 is straightforward. No matter how you slice it, many small communities in the SE region are still functioning because like it or not, resource development. The people and industry that have made it possible to thrive here know how important the balance between harvest and escapement must be. We live here, work here, raise our families here and have great respect for nature and her bounty. Without fish we have none of that. Of the seven major king salmon runs in SE Alaska, 3 are being taken off the stock of concern list for 2025. The others have shown vast improvement. So I feel like the carrying capacity theory is just another grasping at straws theory. Seems preemptive to sacrifice the well being of the entire region when these chinook runs seem to be recovery already. 70% of the value of the fishery is enhanced fish. This Seems irresponsible during already trying times. I am totally 100% opposed to proposal 156.

Submitted by: Nicholas Fama

Community of Residence: Ketchikan

108 oppose. Transferring troll fish to non resident charters is harmful to the troll fishery.

111 support. This seems to be a fair allocation to the charter/sport fishery.

113 oppose. I am opposed to increasing the allocation to non resident/charters. 25% is excessive at a time that charters are thriving and commercial fisheries are struggling.

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Gary Fandrei of Kenai, Alaska.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

I worked in Alaska's hatchery program first as a research biologist for 6 years and then as an administrator for over 20 years. I am now retired and no longer participate in the harvest of salmon, but I still enjoy several meals a year of salmon from our hatcheries.

Reducing hatchery production by 25% would have disastrous economic consequences for all communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that we have access to sustainable salmon harvests regardless of fishing style. Hatchery programs also provide financial resources that support wild stocks through habitat improvement projects and monitoring programs that assist the Alaska Department of Fish and Game (ADF&G) with management. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance.

Hatchery-produced salmon are managed through sound scientific practices that complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from ADF&G. They play a crucial role in safeguarding wild stocks and providing economic stability for all user groups. Reducing hatchery-permitted pink and chum salmon egg take levels by 25% will not benefit Alaska communities or the salmon resource.

Sincerely,

Gary Fandrei
Kenai, Alaska



Submitted by: Luke Fanning
Community of Residence: Juneau

I am writing to OPPOSE proposal 242—which seeks to close commercial red king crab fishing opportunity in 11-A.

I have been a personal use crab fisherman in 11-A for over 25 years. I have also fished commercially for tanner crab in the ring net fishery in 11-A for several years, and have fished throughout the district over the years. The personal use crab fishery is very important to me, and I look forward to taking my crab each season. I also think that it is important to provide a reasonable pathway for commercial fishing when abundance warrants a fishery and that closing more areas commercial fishing is not necessary given the department’s overall management of the fishery.

I can attest that 11-A is a highly productive area for red king crab. Within the district, the most productive fishing areas, including Barlow Cove, Auke Bay, and Eagle Reef are already closed to commercial king crab fishing. Most of the personal use fishing take place in these areas, especially during the winter fishery when PU fishermen tend to fish close to town. These areas are already closed to personal use fishing, and adding more closed areas is not necessary.

Submitted by: Luke Fanning
Community of Residence: Juneau

I am writing in opposition of proposal 156—which would reduce hatchery pink and chum releases by 25%.

The hatchery program has become critically important for all user groups in SE Alaska, and the proposal would cause significant harm to hatchery programs and other users throughout the region.

Our fishing industry is incredibly challenged with processors and fishermen throughout the region already struggling financially. Arbitrarily reducing hatchery production of pinks and chums in SE is unlikely to result in any tangible benefit to other species, such that the harm inflicted by this proposal significantly outweighs any potential benefits.

Submitted by: Sean Fansler

Community of Residence: Washington state

Oppose....This proposal is bizarre. I don't know how cutting 25% of chum fry releases will change the impacts of climate change on our fisheries. Halibut are getting smaller is that because of increased pink production? Only 15 percent of the pinks in the ocean are of hatchery origin, they for the moment are the climate change winners, cutting our revenue source will in no way change this. Please leave current hatchery production as is. Thank you. Sean Fansler

Dear Chair Carlson-Van Dort and Board members,

Thank you for the opportunity to comment, for your service on the Alaska Board of Fisheries and welcome to Southeast Alaska.

My name is Jeff Farvour, I've been commercial fishing since 1989. I live and fish year around out of Sitka. I also actively participate in sport, personal use and subsistence fisheries. Commercial trolling for king salmon makes up approximately 65% of my income. I enjoy sharing my catch extensively on a year around basis with people in my community, especially with those who don't have the means to fish themselves. I also have the privilege of donating fish to Sitka's Fish to Schools program and other programs to aid in food security.

I **SUPPORT** proposals 109 and 110 with AC and RC amendments and also support proposals 119, 131, 132 and 133.

I strongly **OPPOSE** proposals 108, 113 and 156.

I request that the Board's decision achieve these three management objectives:

1. Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation.
2. Authorize in-season management by ADFG to ensure the sport allocation is not exceeded.
3. Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

SUPPORT for proposals 109 and 110 with AC and RC amendments.

Chinook is a fully subscribed resource in Southeast Alaska (SE AK) and has been for some time. SE AK commercial trolling is recorded to have started in 1905. Historically, the troll fishery harvested over 85% of the SE AK's chinook. Since then, the troll fishery has been subject to significant restrictions in order to foster accountability and ensure our fishery does not negatively affect other sectors.

Most of the 31 King Salmon proposals submitted to the BOF this cycle seek to protect the troll and resident sport fisheries from the destabilizing effect of the ever-expanding non-resident sport fishery.

Proposals 109 and 110 with AC and RC amendments recommend working within the current King Salmon Management Plan (KSMP or Plan) construct but offer somewhat different measures to mitigate the expanding effort in non-resident sport fisheries.

The new NOAA Southeast Alaska Incidental Take Statement EIS (recently published in response to the Wild Fish Conservancy lawsuit) notes that:

“Currently, SEAK’s troll fishery has the highest level of local ownership of any major Alaska fishery, making its survival critical to nearly all SEAK’s communities. The economic and community impacts of the SEAK troll fishery, for example, are far reaching to the region, where nearly every community is home to trollers. Trollers comprise the region’s largest fishing fleet, and 85% of the SEAK troll fleet is local to SEAK (Stern et al. 2022).”

The 2025, January 8th Joint Legislative Task Force Evaluating Alaska’s Seafood Industry *Preliminary & Draft* Report reports that :

“The economic benefit of commercial fisheries, including fishing and non-fishing income and employment, accrues and multiplies most significantly in the home community of permit holders. The benefits of Alaska fisheries follow fishermen home to where they live – not where they fish. “

“Many Alaska fishing-dependent communities are experiencing economic distress, and many young or new, rural, small-scale, and low-income fishermen and fishing communities are struggling.”

Supporting proposals 109 and 110 is in line with the Boards Allocation Criteria and the Boards Policy for Mixed Stock Fisheries.

OPPOSE proposals 108 and 113

While proposal 113 seeks a direct, uncompensated re-allocation to non-resident anglers, proposal 108 seeks to reallocate troll quota at mid to lower quotas (which are likely into the foreseeable future) to benefit non-resident anglers. Resident sport is stable and sustainable.

However, it doesn’t consider the longer-term non-resident effort trends or more importantly, the recent steeper increases in non-resident activity. It’s important to note that under the current Plan, the troll fishery is economically harmed when reallocating from the troll fishery, whereas nobody is harmed if troll harvests any unharvested quota from other fisheries. Both proposals come at considerable costs to Southeast Alaska’s coastal and rural fishing communities.

A very recent example of that harm under the current Plan is from the combined 2023 and 2024 sport overage. This overage was driven by non-resident angler harvests, pushing the sport fishery to exceed its allocation by over 30,000 fish. This came at severe costs to **the troll fishery which lost \$2.2 million worth of fish, or about \$4.4M including 1st wholesale value** (loss to SE processors many of which are small community-based

processors). The troll fishery has no path available to timely recover that loss, resulting as a major factor in driving decreased participation in the troll fishery.

Every effort metric in RC 3 Tab1- Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries, highlights expanding non-resident activity in SE AK. This is simply unsustainable.

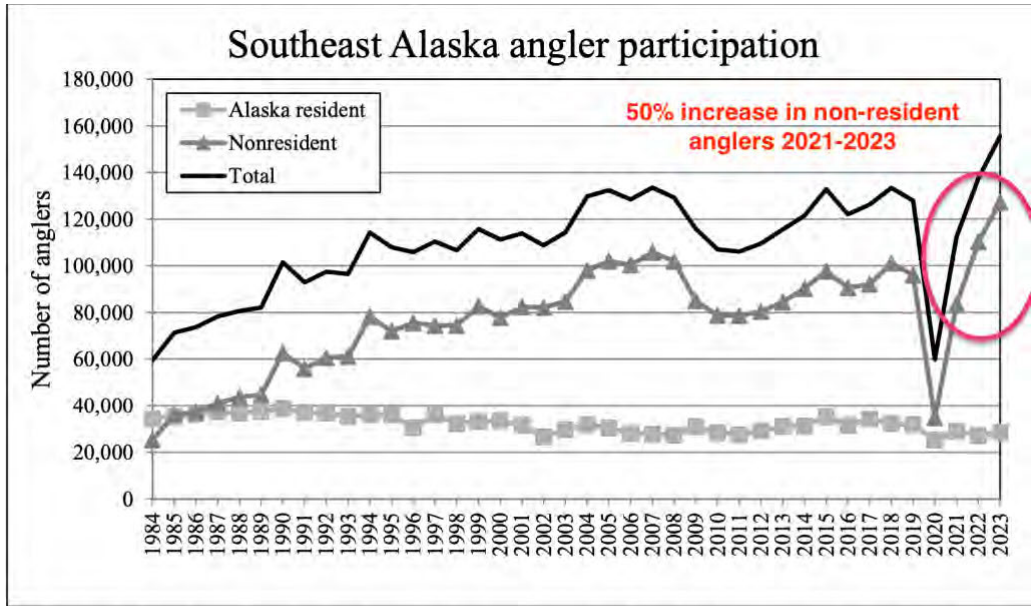
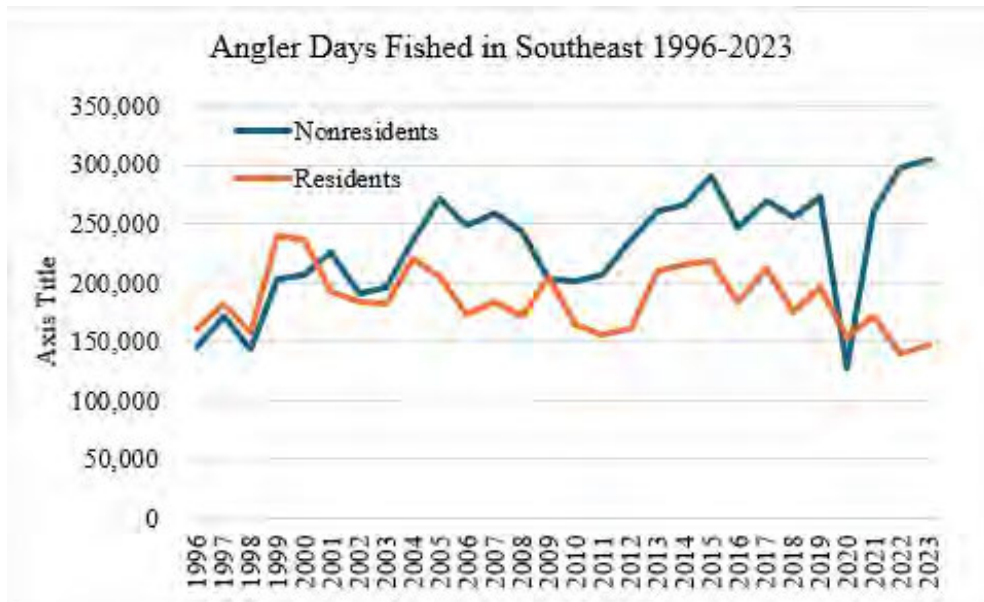


Figure 3.—Number of resident and nonresident anglers who fished in Southeast Alaska, 1984–2023, as estimated from the Alaska Sport Fishing Survey (i.e., SWHS; available at <https://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=main.home>).

Note: Angler participation estimates prior to 1996 can be found on the ADF&G Historic Statewide Harvest Survey Publications website at <https://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=main.historic>.



*The above figure is not in the report but was received as a data request from ADFG

The Report on pg 30 Table 9 and pg 38 Table 13 also shows that Juneau charter vessels are actively operating on just 6-7 kings/charter vessel/season compared to Sitka's 85-90 kings/charter vessel/season. As the report notes "...angler motivations are often focused on opportunity and experiences rather than maximum harvest and efficiency."

In conclusion, while I certainly recognize the importance of sustainable non-resident activity in SE AK, current levels are simply unsustainable and must not come at the continued expense of the historic troll fishery, SE AK's resident sport fisherman and SE's communities.

I request that the Board work with ADF&G and the legislature to explore measures, such as limit entry for Chinook sport fishing guides and boat rental businesses, that would best stabilize all Southeast Alaska Chinook fisheries.

Thank you for reading these comments and taking the time to understand our fisheries.

Sincerely, Jeff Farvour
Sitka, AK

Submitted by: Pete Feenstra
Community of Residence: Washington

- OPPOSE Proposal 134 Penalties for Chinook Retention
- OPPOSE Proposal 156 Reduce SE AK Hatchery Reduction by 25%
- SUPPORT Proposal 157 Create Burnett Inlet THA
- SUPPORT Proposal 158 Definition of Hidden Falls THA lines
- OPPOSE Proposal 167 Increase purse seine length
- Neutral Proposal 168 Use of spotter planes in THA's

Submitted by: Shasta Fenwick
Community of Residence: Sitka

This past year was the first time in several years that we finally got enough eggs on the branches we set. It's been very sparse. We need to protect our fisheries and herring egg harvest areas, as many of us count on this subsistence to feed our families.

Submitted by: Aurelia Field
Community of Residence: Juneau

My name is Aurelia Field and I am 15 years old and live in Juneau Alaska. I have been both commercial and sport fishing with my grandpa since I was old enough to hold a fishing pole on my own. I love to fish especially for salmon, be it on a river, a lake or in salt water, commercial or sport. Please don't let proposal 156 win.

My grandpa and I commercial driftnet and sport fish in Clarence Straits outside of Coffman Cove. It is a special time for me to be able to spend with him doing what we both love.. catching fish! We also spend a lot of time sportfishing when we are not commercial fishing. My first salmon I ever caught on a pole was a hatchery coho salmon and I was so excited! But now it's very difficult to catch a coho in Coffman Cove because Neck Lake hatchery was closed which produced cohos for the region. When we gillnet, we catch mostly hatchery chum. If proposal 156 is approved we are going to see a big difference in our catch.

I also like to fish for hatchery cohos in Gastineau channel within walking distance from my house in Juneau. There are tons of kids like me who fish for hatchery coho in Gastineau channel. Lots of adults too. But If hatcheries get a 25% cut those cohos will likely not get raised by DIPAC. Where will I catch

salmon when most the fish I catch are hatchery fish? Hatchery salmon ARE salmon! Please don't take them away.

Since I was in elementary school, I've done lots field trips to DIPAC hatchery . The were always my favorite field trips. I've learned a lot about hatchery fish over the years and anyone who doesn't understand hatcheries and who are worried should visit a hatchery so they can get a better understanding of how they work and what they do.

Aurelia

PC171

Submitted by: Elizabeth Figus
Community of Residence: Juneau

I am a new permit holder in the dungeness crab fishery, writing to communicate my support for proposals 251, 253, 254, 255, 256, and 257.

As a newer entrant, I want to conserve the dungeness resource for future sustainability to the extent possible. I also want to see the fishery managed in ways that support logical and smooth business operations for permit holders.

While I do not generally want to see the fishing season shortened, I believe that proposal 251 is necessary until ADFG is able to monitor for softshell crab prior to each season opener, and throughout each season. If there is no funding or capacity for pre-season and rapid in-season management, the resource should be managed more conservatively.

Proposals 253, 254, 256, and 257 all relate to fixing outdated language regarding the shrimp and dungeness fisheries. Please make the change to eliminate the 14 days separation period. I trust the Board to determine the most appropriate language/proposal among the four, though 256 appears the most detailed to me, and probably the best option of the four that are grouped together. I also support proposal 255.

I would like to see the general content of proposal 252 passed with revised language/amendments to resolve the staff comments. I think allowing slinky pots for bait fishing is a good idea, but it will be important to ensure that the slinky pots do not create additional management challenges, as outlined by the staff comments.

Generally, I think dungeness should be managed carefully and with consideration for encroaching sea otter predation through Southeast Alaska. I do not think opening all closed areas would help the resource, but I would like to see better management of the sea otters throughout the region. I understand that the Board of Fish does not manage sea otters, but I think it is important to note that sea otter populations are putting all shellfish fisheries at risk of complete devastation, because the otter populations are not managed.

Thank you for your time and consideration of my comments.



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January 10, 2025

Alaska Board of Fisheries P.O. Box 115526
1255 W. 8th Street Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

We hope this letter finds you well. We are Josh and Chace Anderson, the owners of Fireweed Lodge located on Prince of Wales Island in Klawock. Our family has been operating this lodge for the past 35 years, and we appreciate your time in considering how the recent proposals will impact our sport fishing industry.

Proposals we support: 108,122,123,131,134

Proposals we oppose: 109,110,111,114,115,116,117, 118,119,120,130,140,141

As an Alaskan born and raised in this region, we have witnessed the evolution of sport fishing regulations and their growing impact on our ability to attract clients, particularly at the start of the fishing season. While Halibut, Lingcod, and Rockfish offer some alternatives, King Salmon fishing remains the primary draw for visitors to our community.

If regulations restrict non-residents from catching three King Salmon annually during the early season, we anticipate a 30-40% decline in our business. Such a loss would significantly harm the economy of our small community, impacting not only our lodge and Klawock city tax revenues but also local industries like airlines, grocery stores, gift shops, fuel suppliers, and barge services. Furthermore, this would jeopardize the livelihoods of our 35 employees, 25 of whom are Alaskan residents.

Proposals to reduce the bag limit to two or even one King Salmon for non-residents in June would eliminate the feasibility of offering three-day fishing trips. The high travel costs to Prince of Wales Island already make shorter two-day trips impractical for most clients. These restrictive limits would further discourage bookings, denying visitors the opportunity to experience the exceptional fishing our community has to offer.

We respectfully urge the Board to consider increasing allocations during periods of low abundance to sustain opportunities for visitors. Historically, our average allocation has been approximately 20%, achieved with a three-annual limit in the early season (May/June). Capping the allocation at a hard 20%, however, would result in numbers far below this historical average and further strain our operations.

Thank you for your attention to these critical matters. We appreciate your thoughtful consideration and hope for solutions that balance sustainable fisheries for resident and non residents with the vitality of our local community and the sport fishing industry.

Sincerely,
Josh & Chace Anderson
Fireweed Lodge

Fireweed Lodge

Submitted by: Thomas Fisher
Community of Residence: Juneau

I'm in strong support of 109 and 111. I have fish either sport or commercial since 1966, I have watched the commercial charter fishery start in its infancy and grow into a very efficient fish killing fleet. When I started sport fishing in 1966 a sport fisherman fished mostly in small boats under 20 feet. Now the commercial charter fishery has big aluminum boats with state of the art electronics electric down riggers, usually 2 outboards that deliver anywhere from 500 to 700 horsepower. They now are fishing every cape in SE and ranging offshore to places like Forester island. ADFG management seems to turn a blind eye to their effect on fish populations be it king salmon, bottom fish or shellfish. The reality is now there are areas throughout SE that are overrun by the commercial charter fishery, and local residents and the commercial troll fishery are being displaced. I have fished Duke Island south of Ketchikan my entire life and we used to be plagued by bottom fish on our lower leaders, there was never a sport boat there. Now there on any given day in the summer closed to 30 commercial charter boats there and when they get their limit of salmon which they all do they then go bottom fishing, the bottom fish population has shrank to very few fish.

This summer I was fishing off Meyers Chuck and listening to charter boats on the radio the coho bite had slowed up and because they have already jigged up all the halibut in the area they started targeting silver grey(a worm infested rockfish) which can't be consumed by humans. The point I am trying to get to here is it really doesn't make a bit of difference to this industry what they kill as long as they get to kill something. The commercial charter fishery has hid behind AK resident sport fishery and claimed they need to have unrestricted access to sell charters. And ADFG refuses to manage them according to the pressure they are inflicting on marine resources. If there aren't meaningful management actions taken soon they will literally fish themselves out of business. The marine resources of SE are finite and fully utilized, to have one user group allowed to continue to grow and fish without meaningful management actions will lead to stocks collapsing through out the region.

Now it may seem I have wandered off topic however I disagree by enacting one of the above proposals the Board is telling ADFG to start managing the commercial charter fishery and recognize the impact they are having on all marine resources they harvest. We would not let any other user group have unrestricted harvest on the marine resources of this state as this one industry has. I urge you to give ADFG instructions to manage this fishery and its impact on all the various marine resources it harvests. And to not keep taking from another user group's allocation.

Alaska Board of Fisheries

P.O. Box 115526
1255 W 8th Street
Juneau, AK 99811

Dear Members of the Alaska Board of Fisheries,

My name is Nichole Ford, I am the assistant manager at Eagle Charters in Elfin Cove, AK. I appreciate your consideration of my letter where I will express my opinions on the following proposals:

Oppose: Proposal 109, Proposal 110, Proposal 111, Proposal 114, Proposal 115, Proposal 116, Proposal 117, Proposal 119. Proposal 120, Proposal 125, Proposal 140, Proposal 141, Proposal 203, Proposal 210

Support: Proposal 108, Proposal 207, Proposal 208

I am writing to express my strong **opposition to Proposals 109, 110, 111, 114, 115, 116, 117, 119, 120, 125, 126, 140, 141, and 203.** If enacted, these proposals would significantly harm the sport fishing industry and related businesses in Southeast Alaska, which are vital to the region's economy. The proposed changes threaten not only the stability of our operations at Eagle Charters but also the livelihoods of the individuals and families who depend on this industry, some of which are local Alaska residents.

Sport fishing is a major driver of the economy in Southeast Alaska, and the region's fishing lodges, which provide nonresident anglers with access to world-class fishing opportunities, have already been dealing with increasing uncertainty due to fluctuating regulations. We have seen a noticeable decline in customer confidence as many long-time clients are expressing concerns about the unpredictability of fishing seasons and stating that they will not return if this uncertainty continues. These changes are directly affecting our ability to operate effectively and maintain the level of service our customers expect.

Specifically, I am concerned about the proposed reduction in nonresident king salmon limits, particularly during the critical fishing period from mid-May to mid-July. King salmon are essential to our business, especially in June, which has historically been a peak month for bookings. With limited fishing opportunities for other species, the reduction in king salmon limits during this period would further reduce demand, making it increasingly difficult to secure reservations. This would severely impact our ability to attract nonresident anglers and operate at full capacity.

Moreover, further restrictions on king salmon harvests during peak season could shorten our operational season by as much as 50%, which would have a devastating ripple effect on our business and the broader local economy. Our lodge supports a range of local suppliers and provides employment to residents, all of whom rely on the success of our business. Any decline in operations would negatively impact the entire community.

Additionally, the introduction of day closures within the king salmon sport fishery would add even more uncertainty, further discouraging customers from booking their trips. The unpredictability caused by such closures would undermine the trust that our customers have in the sport fishing sector, making it even harder to maintain a viable business. The instability caused by these proposals could have far-reaching

consequences for businesses like ours and the region as a whole. I urge you to carefully consider the far-reaching consequences these proposals would have on our operations and the communities that rely on a healthy and thriving sport fishing industry.

On the other hand, I fully **support Proposal 108**. This proposal provides a balanced approach by reinstating key elements of the Southeast Alaska King Salmon Management Plan, ensuring sustainable harvests while allowing uninterrupted sport fishing. By managing king salmon harvests to stay within the annual ceiling and allowing in-season transfers from the troll fishery to the sport fishery, Proposal 108 helps maintain flexibility while respecting harvest limits. Furthermore, it includes important safeguards for nonresident harvests, ensuring the long-term health of the king salmon population while promoting fairness and stability for all stakeholders.

I also **oppose Proposals 140 and 141**, which mandate the use of barbless hooks and ban baited hooks. These measures could increase stress on fish, leading to higher mortality rates and reducing an angler's success rate. These changes are unnecessary and would create significant obstacles for both recreational and subsistence fishermen without clear evidence of their need for conservation.

Finally, I **oppose Proposal 203**. If lingcod limits are to be liberalized, it is crucial that the changes apply equally to all nonresident anglers. Given the growing number of unguided sport fishing operations, allowing liberalized limits solely for unguided anglers could still have a significant negative impact on the fishery. Any changes to lingcod limits should be postponed until there is sufficient research to confirm that the population can support such an increase.

Thank you for considering my concerns. I urge you to prioritize policies that protect the sustainability of our resources while supporting the economic well-being of the communities that rely on the sport fishing industry.

Sincerely,

Nichole Ford

Assistant Manager, Eagle Charters

Comments to the Southeast Alaska Board of Fish, Ketchikan Alaska, January 28-February 9 2025
 Jacquie Foss
 Sitka, AK

These are the personal comments of Jacquie Foss. I only represent myself as a southeast Alaska (SEAK) resident. We are year round, SEAK residents with two kids in the public school system. I participate in resident sport and subsistence fisheries and my husband and I own and operate a commercial salmon troller. Our livelihood is catching salmon and an average of 40% of our income depends on King Salmon. The last two years we did not get an august opener because of the overharvest by non residents. This is a significant financial hit to our family.

You will read in other comments about how king salmon are getting smaller, and the Pacific Salmon Treaty has limited Alaska's historic access to King Salmon. Everyone has seen the costs of goods and services skyrocket. All of these are true. If anything, trollers need more fish but we are only asking for our historic allocation of 80% of the harvest after the reduction from the nets because we recognize that many people make a living on King Salmon.

Further the non resident effort has increased. The argument that the lodge or guide businesses are steady. That may be but there has been a dramatic increase in nonresident angler days in recent years (table 1). While I am glad to have people learn to love Alaska like I do, there is not enough fish to support this level of effort. There needs to be some caps on the nonresident king harvest, for resident sportfishermen and trollers.

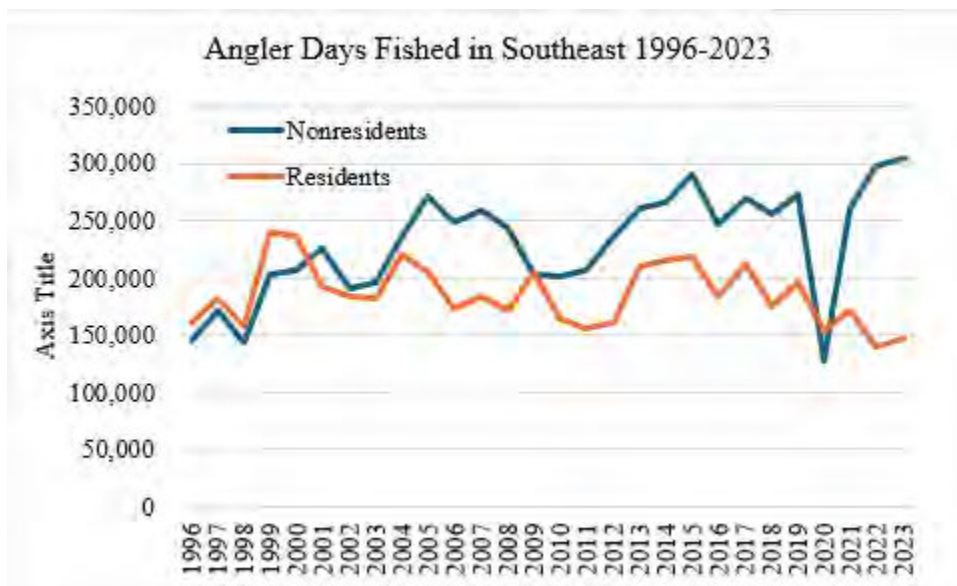


Table 1. nonresident angler days—from ADFG's sportfish report

You have several King salmon proposals in front of you. Here are the most important pieces of each of them to me:

- 80/20 troll/sport split after the reduction from the nets
- Protection and prioritization of resident anglers within the 20% sport allocation
- In season management to keep the nonresidents within their allocation
 - Here are some suggestions on in-season tools:

- Adjusting bag or annual limits to speed up or slow down catch rates
- closing areas of high abundance to slow down catch,
- closures on nonresidents to protect residents
- among others
- No borrowing between sport and troll

In season management is critical for all sectors to stay within their allocation and meet the restrictions from the Pacific Salmon Treaty. The current King Salmon Management Plan has harmed both resident sport fishermen and trollers. King Salmon management is abundance-based management and the Department needs all of their tools to meet the demands of the Treaty.

Proposal 104—Oppose but could be amended to ensure that this comes out of the sport allocation.

I support resident priority for the 20% sport harvest already allocated. The department must prioritize residents in that section rather than the nonresidents. Further, 80% of this proposal would come from allocation currently going to trollers leaving leaving more fish for the non residents than they currently have.

The SEAK resident sport fishery for kings is a quasi-subsistence fishery and is very important to residents. This proposal was likely included because last summer the overharvest by nonresidents shut down the resident harvest and impacted the troll fishery.

Proposal 105—Oppose

I do not support nonresidents having the same bag limits as Alaska residents in any waters. If the department must have the same regulations in the EEZ, the residents should have the same bag and annual limits as nonresidents.

The department will say there is very little fish taken in the EEZ by nonresidents. Because right now there is not an advantage to do so. With this regulation in place and if nonresidents have the same rights as residents there will be motivation to do so and the catch will increase.

Proposals 106 and 107—no opinion

If the board and department enact nonresident bag limits in the EEZ and hold residents to those same limits, neither of these will be necessary.

Proposal 108—Oppose

This is a confusing regulation that is an uncompensated reallocation of the troll fishery to the nonresident anglers. There is no in season management, there is borrowing between troll and sport, and it does not meet 80/20.

This proposal would average across 9 years. The past 9 years includes 2 different treaties, 3 different ways of determining abundance under those treaties, and at least 3 different king salmon management plans. This is not an apples-to-apples comparison where each year is similar. Averaging across this complex set of management regimes does not yield a reasonable number.

Averaging has not shown that it works, as demonstrated the past 3 years. Plus this proposal would not pay back trollers from taking their fish. Instead, nonresidents average harvest would have to exceed by 22% for two years in a row in order to not take 5% from trollers. This would most heavily impact the August opener for trollers.

This proposal does not include in season management, something SEAGO has been on record at AC meetings saying they favor.

They say this is a bad treaty but they expect the treaty to make trollers whole. It's all around a bad treaty and we need to get through these next 3 years and fight together for a better deal for AK.

Trollers cannot lose fish in most years and survive to make it to the one year where we might get a windfall. The guides are asking for consistency. So are we. We cannot lose our consistency in favor of theirs.

Proposal 109--Support with amendments. These amendments will be submitted as an RC at the Board of fish.

Proposal 110--Support

Proposal 113—Strongly Oppose, this is a 5% reallocation from troll to sport

Proposal 118—Support. Non residents do not need fish more than Alaska residents.

Proposal 121—Oppose. This KSMP needs to change, urgently.

King Salmon-sport SOC action plans

Proposal 124—support. As long as the SOC streams will meet escapement and conservation measures are in place, resident sportfishers should have access to the hatchery fish in these areas.

Proposals 125 and 126—support. These are necessary conservation measures for SOC. However, consider proposal 124 for resident access to some of these areas for hatchery kings when they don't burden the stocks of concern.

King Salmon-Commercial

Proposal 130—Oppose. While I applaud the effort to get trollers their kings, these openings are critical to the salmon treaty and would like to keep AK in a good position there.

Proposal 131—Support. This gives the department the necessary tools to prosecute the august opener in an equitable manner for trollers when the opener is predicted to be very short.

Proposals 132 and 133—support. This is a better way to *measure* salmon. These are not smaller salmon, just measured differently to ensure we harvest the hatchery fish that we are targeting.

Southeast Subsistence Salmon

Proposal 135—support. The Redoubt sockeye subsistence fishery is critical to the Sitka community. When the runs are large all gear should be available for use by subsistence users. I would prefer these fish end up in the hands of residents than in a commercial opener.

Enhancement and Terminal Harvest Areas

Proposal 156—oppose. The number is arbitrary and is not based on any science or data. This proposal would have a direct impact on the SEAK economy, My family’s livelihood as trollers, and the sustainability of both hatchery and wild salmon stocks. Hatcheries play a critical role in supplementing salmon returns, supporting local jobs, and stabilizing the availability of salmon for all Alaskan user groups, including subsistence, personal use, sport, and commercial fisheries.

Proposal 158—support, housekeeping from ADFG

Commercial Salmon

Proposal 169—Oppose. This would be a challenging enforcement issue for wildlife troopers. Hand troll vessels can often look like sport vessels, and often are sport vessels. This would be especially problematic in Sitka during spring where sport fishermen can go to more areas than commercial fishermen. A hand troller with downriggers can easily go to a closed area, catch kings, then report they caught them in an open area. Gurdies and downriggers look very different.

Herring proposals (proposals 171-181)

Many of these proposals are more guidelines and intent that changes to regulatory language, so it is difficult for me to say what I do and do not support. I live in Sitka and make a living trolling for the very salmon that depend on herring. I support conservative management of this precious resource so that it can recover. Further, I support prioritizing subsistence users over commercial users in this case.

I have begun listening to testimony at local AC meetings. I have learned that the Department will change or divert openings around active subsistence use. This is a good practice that is not in any sort of regulation. There are also several areas that are no longer open to commercial users, and have subsistence-only users there. Unfortunately fish have fins and it no longer appears that this area is sufficient for subsistence users because the herring are spawning in a different area. Proposal 179 adds a protected bay with a strong history of subsistence harvest to the area closed to commercial fishing. This is a good, straightforward proposal that will help for the years that this area has herring spawn. It doesn’t solve the problem.

I urge the department to engage in co management of the herring resource with the traditional harvesters. They way forward is together. I didn’t hear subsistence users ask to stop all commercial herring harvest, but just consideration for the long term survival of the herring, and their dependance on this resource.

Groundfish—Lingcod Proposals 199-202

Lingcod proposals 199-202 are directed lingcod fishery. This is primarily taken by the troll fleet. There has been increased pressure on these stocks since trollers have lost access to King salmon. This loss of access is from SOC during the spring and the loss of kings from the treaty and the loss of the august opener the past two years. This is how the troll fleet has diversified and how we pay our bills.

Proposal 199—support however, the weather factors into every fisherman’s decision. This fishery is in some of the most dangerous waters in SEAK and it is already not equitable. You need a bigger boat to get to these areas. Adding weather delays is good because it gives the

department the flexibility it needs to prosecute the fishery. Ensuring the weather is good will ensure that these fish get caught faster, however.

Proposal 200—support as long as reporting is not excessive (more than once per trip) and the department should not require fishermen purchase communication equipment to just report to them.

Proposal 201—Support. These are helpful clarifications by the department

Proposal 202—begrudgingly support. This proposal took me several reads and an explanation by the author to finally understand. It seeks to prevent two “trains” from being attached to two troll wires at the same time. It hinges on the new definition of “operational unit” which is a train, attached to troll wire, attached to gurdy. Any of these things on their own is not considered an operational unit and having them on your vessel is not a violation. I am curious to see what enforcement has to say about it though.

Proposal 203—strongly oppose. Just because you aren’t guided, doesn’t make you a resident. Liberal bag, annual, size limits for residents are a privilege to be enjoyed by people who choose to make Alaska their home, not for people who can rent their own boat.

Comments to the Southeast Alaska Board of Fish, Ketchikan Alaska, January 28-February 9 2025
Zack Foss
Sitka, AK

I am a commercial troller, based out of Sitka. Trolling is my livelihood and how I support my family of 4. King salmon ranges from 40 to 50% of our income. Two consecutive seasons of the loss of the August king opener hurt my family financially. King salmon are worth 9 times what a coho is worth and 17 times what a chum is worth. There is not enough time in the season to make up the loss of the second opener with these other species.

We have not lost access to king salmon for a conservation concern, we lost these fish because one sector went wildly out of their allocation and took them from us.

If anything, trollers need more fish to make up for the loss of the 34,000 fish taken by the non resident sport sector. The troll sector do not have proposals asking for these back so the board should be moved to keep everyone to their 80/20 allocation. If there is a payback, these fish should go to the resident sport fishermen who were shut down last summer and couldn't catch the fish to feed their families.

King Salmon Management Plans

Proposal 104—Oppose but could be amended to ensure that this comes out of the sport allocation exclusively and I would support it.

Proposal 105—Oppose

I do not support nonresidents having the same bag limits as Alaska residents in any waters. If the department must have the same regulations in the EEZ, the residents should have the same bag and annual limits as nonresidents. There should not be an advantage to non residents with boats capable of going 3 miles off shore.

Proposal 108—Oppose—this is very similar to the current king salmon management plan that has harmed trollers two years in a row and resident sport last year.

Proposal 109--support

Proposal 110--Support

Proposal 113—Strongly Oppose, this is a 5% reallocation from troll to sport

Proposal 115—Support. The guided sector has no limited entry and there needs to be some control on them impacting resident opportunity.

Proposal 121—Oppose. This KSMP needs to change, urgently.

Groundfish—Lingcod Proposals 199-202

Proposal 199—Oppose. Weather is one of the factors that keeps this fleet small. The quota isn't big enough to support a bigger fleet. Waiting for calm days could potentially double the number of boats that go, making it a one day opener. This would make it cost prohibitive for people to run to the grounds.

Proposal 200—support with amendments that clarify that reporting occurs once per trip and does created undue burden on captains to purchase equipment that they don't already have.

PC177

Submitted by: Carrie Fox
Community of Residence: Virginia

I recommend that the Board of Fish select the elements of proposal 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize substance harvesting and to prevent the development of any high volume or non-food herring fishery in Sitka sound. I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

PC178

Submitted by: Graham Gablehouse
Community of Residence: Wrangell

This comment is opposing proposal 224 to revert the commercial shrimp fishery back to the fall start date. Returning to harvesting eggars in the fall will only hurt the future of the fishery. This two year period is not long enough to see the results of the post spawning spring start. The decision should be based on what's best for the future of the fishery not because a few aging of the fleet fisherman didn't like the schedule change. The season start date should stay in the spring.

PC179

Submitted by: Nicholas Galanin
Community of Residence: Sitka

Protecting The Herring

As a Tlingit man, I speak from a deep connection to the land and waters that have sustained my people for generations. Herring are not just fish to us; they are a keystone species that nourish our ecosystem and hold cultural and spiritual significance. The health of Sitka Sound's herring reflects the health of our communities and our future.

I urge the Board to prioritize subsistence harvests over high-volume, non-food fisheries. Our relationship with the herring is one of reciprocity and respect; we cannot allow it to be sacrificed for unsustainable commercial practices.

I stand in support of Proposals 173 through 177 to:

Increase the minimum threshold for harvesting, ensuring enough herring remains to spawn and sustain future populations.

Reduce the harvest rate to protect the balance of Sitka Sound's ecosystem.

Establish a strict harvest cap for the commercial sac roe herring fishery, recognizing the limits of what the environment can sustain.

I also urge the Board to reject proposals that threaten subsistence and sustainable resource management and support those that reflect Tribal sovereignty and co-management, ensuring Indigenous voices and knowledge are central to decision-making.

Proposal Recommendations:

173: Support

174: Support

175: Support

176: Support

177: Support

178: Support

179: Support – This protects an area vital to subsistence harvesters.

181: Support – Reduces unnecessary herring mortality during test sets.

182: Oppose – This would harm herring populations.

183: Oppose – This prioritizes commercial interests over sustainability.

188: Support

189: Support

190: Support – Acknowledges Tribal sovereignty and establishes co-management for subsistence resources.

Herring are life—

Ch’a Idakát át a yakgwahéiyagu kudzitee.

In everything, there is a spirit.

Protecting them is not just an environmental issue; it is a matter of cultural survival and responsibility to the generations that come after us. I urge the Board to make decisions rooted in sustainability, respect for Tribal knowledge, and the understanding that our futures are interconnected.

Gunalchéesh.

Submitted by: Joseph Gallagher
Community of Residence: Haines Alaska

Proposal 108 oppose

Proposal 113 oppose

Proposal 110 support

Proposal 111 support

I oppose proposals 108 and 113 because they reallocate chinook salmon away from the historical user trollers, of which over 85% Alaskan resident and reallocated to non resident sport fisherman. SE Alaska rural communities and the people that live in them depend on these king salmon for the survival of our way of life. I support 110 and 111 in an effort to keep the sport fishery at its historical cap of 20% of the chinook quota while making sure we keep the ability of Resident Sport Fisherman to harvest king salmon. Resident sport anglers should never be shut down because harvest largely driven by non resident anglers go over it's historical 20% share of the treaty quota.

Thank you

Joseph Gallagher

Haines Alaska

Submitted by: Christa Giambrone
Community of Residence: Afton, MN

I oppose the regulations set forth in proposal 156.

Submitted by: Matt Giambrone
Community of Residence: Afton, MN

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska.

As a SE seiner, this reduced production would have a negative impact, not just for myself and the four crew members I employ but for all the communities of SE Alaska. My fishing business depends on the economic opportunity afforded by hatchery programs. Every season a significant portion of my revenues are derived from hatchery fish. This revenue of course, pays my crew members and myself but also as the board is no doubt aware contributes to communities throughout the region.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25%

would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are also critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

PC183

Submitted by: Sawyer Giambrone
Community of Residence: Afton

I am a 17 year old aspiring commercial fisherman, hatchery production is a crucial part of revenue generation for our family. I urge the board to appose proposition 156.

Submitted by: David Gibson
Community of Residence: Juneau

Chair Carlson- Van Dort, Members of the Alaska Board of Fisheries

My name is Dave Gibson

I am a commercial fisherman born and raised in Juneau. I have worked on and operated a commercial salmon vessel since 1995 and continue to do so today

I strongly Oppose proposal 156 which would cut 25% of hatchery produced Chum salmon.

Currently 70-80% of my income comes from chum hatchery fish in the Juneau and Sitka areas produced by DIPAC and NSRAA and a 25% reduction would eliminate most if not all of the Chum salmon I'm allowed to catch in the these areas, making it very difficult for me to continue my operation. Chum salmon pay for all the hatchery fish produced in this region that includes sockeye, king salmon, and coho. Eliminating 25% of chum would have the effect of eliminating those programs as well. The fact that we have hatchery fish to catch here takes the pressure off of wild stocks and allows opportunities for the Sport, Charter, and commercial fisherman who live here especially in seasons of lower wild fish abundance, allowing those wild stocks to recover as we've seen with the Chilkat and Unuk creek kings that are no longer listed as stocks of concern and the Taku whose forecasted 40000 kings is the highest we've seen in years, well above escapement goals.

It is my opinion that this proposal shouldn't even have been accepted at the Board of Fish firstly because it doesn't meet the criteria of changing or amending any existing regulation and secondly as there is already a venue to address these issues in the RPT that meets twice a year. I believe that this proposer has made this same proposal in one form or another every cycle for 25 years and been told no by every region every time. When is enough enough? There is no proven science behind this proposal just arbitrary opinions based on unverified papers. The people of the state who use these fish have spoken we don't need to rehash these points every single cycle they need to be addressed at the RPT if at all.

Please join me in vehemently opposing this proposal 156 that is extremely detrimental to our way of life in this region

Thank you,

Dave Gibson

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brian Gierard of Ketchikan, Alaska. I am a commercial fisherman. Proposal 156 would impact me through loss of income and opportunity.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Brian Gierard
Ketchikan, Alaska



PC186

Submitted by: Benjamin Gilbert
Community of Residence: Juneau

I am writing to SUPPORT Proposal 242 which would protect local unit !!a for resident sport fishers to harvest king crab. Last time the unit was opened for commercial crabbing it destroyed to stocks so much it took years until we were able to harvest king crab locally again as sport fishers.

PC187

Submitted by: Jeffrey Golden
Community of Residence: Maple Falls WA

I oppose proposal 156

PC188

Submitted by: Jamie Gomez
Community of Residence: Maryland

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. Indigenous knowledge should be valued and respected, particularly when managing our natural resources and environment.

I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

Submitted by: Bethany Goodrich
Community of Residence: Sitka

My name is Bethany Goodrich, I am a resident of Sitka and am commenting on the topic of herring. While I was not born here, I am raising my family here and have created my home in Sitka because of the people, abundant lands and waters, and the rich culture and connection to our seasons and this place. That abundance and that vitality.. are truly rare.

And the basis of that abundance, in so many ways here in Sitka is underlined by a healthy herring stock.

Before moving permanently to Sitka I read about herring in books while studying for a masters in Biodiversity, Conservation, and Management at Oxford University where I met and learned from Thomas Thornton whose seminal work on herring has helped illustrate the true extent herring once had, and the shifted baseline we now manage too.

Now that I live in Sitka I experience Herring first hand and out of academia and have been so grateful to have spent over a decade chasing herring spawn for nutrition, and as a photographer and writer. Few people on this planet would believe the abundance of life that fill the coves during herring season.. Because few people on this planet sadly have experienced anything like it. In Sitka we still have time.

And during those years, I've met people from Kake, from Hoonah and other rural communities all across the Southeast whose herring populations, are now depleted who must travel annually to the final stronghold of herring in pursuit of herring eggs. ALL of the great many people I've met are concerned. They are concerned with a less predictable, less consistent patchy herring spawn. Many of those people are returning home nearly empty handed. And I've seen it too in just 10 years of experience, changes to the chase.

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

Submitted by: Dylan Grafe
Highliner Lodge & Charters

Community of Residence: Pelican

Dear Members of the Alaska Board of Fisheries,

My name is Dylan Grafe. I'm the General Manager and one of the fishing guides at Highliner Lodge & Charters in Pelican.

Highliner Lodge and the 6 new businesses we have spawned in recent years, all located in this rural fishing village of Pelican, employ over 30 hard-working young people and their families. This is an aging town of about 60 residents, all of whom benefit from the charter fishing industry. Our businesses alone contributed \$750,000 in direct payments to the City of Pelican in the combined years of 2023 + 2024. These are all the result of tourism dollars coming into the state and staying right here in the community. They are used for critical services, repair of public buildings and infrastructure, jobs and training for city staff, and indirect subsidies for anyone just starting or finishing out their life in a place that has had virtually no economy since the 80's. Additionally, our success in recent seasons has made possible significant reinvestment, steadily creating new jobs and attracting industrious young people who will help rebuild this village and community.

No other industry in a place like Pelican comes close to the economic contribution that just a dozen charter boats can produce in the summer months. It is critical to our business and the future of Pelican that demand for our services not dissipate due to further reductions in non-resident sport limits, particularly king salmon. Although we have been successful in recent years at growing our business, we are already attempting to sell fishing trips during which our customers can only keep 1-3 king salmon and a handful of other species. I am acutely aware of customer frustrations with the state of non-resident fish limits as I'm the one tasked with selling them these trips, often over a year in advance. At least a third of our guests book their trip based on historic king salmon limits so this is clearly at the top of their priority list. Many have already stopped fishing in Alaska and explained that it's just gotten too disappointing to pay all that money and be allowed to keep so little, despite the seemingly incredible abundance in our area.

The frustrations that our customers have been sharing are very real. I'm concerned that further reductions in the state-managed species, especially to king salmon, would have a dramatic impact on demand for our services.... as well as all the other businesses that rely on these independent travelers.

If the state were to reduce non-resident king salmon limits in our area during the months of May/June (from 3 fish per year), I'm certain we will all lose a significant number of customers. If it were to close king salmon entirely, the result would be catastrophic. Without charter fishing, we believe that there is no future for a town like Pelican. There are currently no viable alternatives.

I'm not commenting on any particular proposal. I just ask that you consider the potentially disastrous economic effects that further limitation to charter fishing access in Northern Southeast, particularly in regard to King Salmon... and not just to the operators but also the communities they support. These decisions may severely limit or destroy the future of entire generations in remote Alaska fishing villages.

Respectfully,
Dylan Grafe



Greater Juneau Chamber of Commerce

3030 Vintage Blvd, Suite 100 • Juneau AK 99801 • (907)463-3488

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Coeur Alaska

Drew Green

CLAA

Aparna Palmer

University of AK-SE

Marc Guevarra

First National Bank Alaska

January 9, 2025

Alaska Board of Fisheries

Re: Proposal 156 – Reduction of Hatchery Production

Chair Carlson Van–Dort, Members of the Alaska Board of Fisheries,

The Greater Juneau Chamber of Commerce strongly opposes proposal 156, which would limit the production of hatchery fish.

Our mission is to ensure the health of the business community of Juneau which is comprised of government, tourism, mining, and fisheries. The DIPAC hatchery, which started in 1989, has become an important asset for the community, producing Chum, Sockeye, Chinook and Coho salmon for personal use, sport, and commercial fisheries. Their production of chum salmon is the hatchery's largest revenue source, which in turn supports the production of the other species, important to the region.

DIPAC has also become an important tourism attraction, education center, and venue for community events. DIPAC offers free marine life education to the Juneau School District, and any other Alaska school children. The Visitor Center welcomes approximately 70,000 tourists a year and offers a place for Juneau residents to use during events in the winter months.

While the decline of Chinook salmon stock to the Yukon River and other areas in Alaska is no doubt concerning, there are a myriad of factors at play; global warming and the increased water temperatures, foreign fishing pressure, trawling by-catch, and competition for feed in the open ocean. These have all combined to create many problems in the Alaska seafood industry. There are groups and agencies studying these issues which are all complex and difficult to assess. It seems that reducing the chum egg-take by 25% appears to have no basis of fact as to its impact on the problems, but it does have an immediate and measurable impact on the ability of DIPAC (and other Southeast hatcheries) to remain profitable and continue their role of providing fish stock to the region.

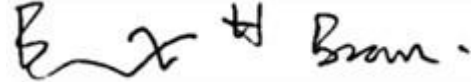
Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups.

We urge you to oppose Proposal 156

Respectfully,



Maggie McMillan, Executive Director
Greater Juneau Chamber of Commerce



Benjamin Brown, President



January 10, 2025

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Christy Willis
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Tongass Federal Credit Union

Gordon Williams
Attorney

Jai Mahtani
Gold Rush Jewelry

Janie Henderson Ellis
Cedar Point Studio

Nicole Tubei
Wolfpoint Produce

Chamber Staff

Michelle O'Brien
Executive Director

The Board of Directors of the Greater Ketchikan Chamber of Commerce, an entity that has championed the economic development of Ketchikan since 1967, **STRONGLY opposes Proposition 156.**

Hatcheries, Ketchikan based SSRAA being one of them, play an increasingly critical role in sustaining our salmon populations, supporting local economies, and preserving a way of life that has defined our communities for generations.

Southeast Alaska's fisheries are not just an economic driver; they are the backbone of our region's cultural and social fabric. Commercial, sport, and subsistence fisheries all depend on the consistent and reliable contributions of hatchery-raised salmon. These fish supplement natural stocks, ensuring sustainable harvests while reducing pressure on wild populations. Without hatcheries, many communities would face significant challenges in maintaining their livelihoods and traditions.

The economic benefits of hatcheries are profound. From commercial fishing operations to processing facilities, charter businesses, and local retailers, the ripple effect of hatchery-supported fisheries touches nearly every sector of our economy. Thousands of jobs and millions of dollars in revenue are directly tied to the success of these programs. Moreover, the revenue generated helps sustain public services and infrastructure that benefit all Alaskans.

In addition to their economic importance, hatcheries also play an essential role in scientific research and conservation efforts. By working alongside state and federal agencies, hatcheries contribute valuable data on salmon life cycles, migration patterns, and habitat needs. This information is crucial for effective fisheries management and ensuring the long-term health of our ecosystems.

The Chamber Board of Directors strongly opposes Proposition 156, as it would undermine the resources necessary for hatcheries to function effectively, jeopardizing the livelihoods and cultural heritage of our communities.

Together, we can ensure that Southeast Alaska's fisheries remain a cornerstone of our economy, culture, and identity for generations to come.

We would appreciate your support on this matter of vital importance to Ketchikan's economy.

Michelle O'Brien
Executive Director
Great Ketchikan Chamber of Commerce

Submitted by: Tyler Green
Community of Residence: Sitka

Dear Board Members,

I would like to begin by thanking you for providing the opportunity for fishermen, who are directly affected by the decision-making occurring through these meetings, to have a voice. It is crucial to provide perspective on how even seemingly small changes can have a significant impact on an already struggling industry.

I have trolled in the waters of Southeast Alaska, primarily out of Sitka, since the late 90s. As a small, family-run operation, we've had to invest in additional limited entry permits to diversify our business and make our initial investment in a fishing vessel more viable. Reducing our catch limits or reallocating our harvest when other sectors exceed their limits would directly impact the ability to pay for essential services like moorage fees and could lead to derelict vessels in harbors across the region. As small business owners, our access to resources like free and reduced lunch, migrant education services, and childcare assistance is dependent on our catch opportunities, but many of these services are out of reach due to requirements based on gross revenue, active fishing days, and fishing outside of our district. If we can't afford the necessary equipment or maintenance, we're often forced to fish in areas with limited opportunity or compete with the sport sector for the same fish. We want to raise our daughter within this industry and hope it remains a sustainable option for future generations.

I am writing in support of Proposals 109 and 110 with RC amendments. It is essential to preserve the current management plan structure. Both proposals offer distinct approaches to addressing the growing effort in nonresident sport fisheries, particularly in the context of lower all-gear catch limit scenarios. They propose varying management measures that are necessary to account for the different levels of harvestable Chinook abundance throughout the season. I respectfully request that the Board's decision aim to achieve these three key management objectives:

Maintain the 80/20 allocation split between the troll fishery and the sport sector, ensuring that each sector is managed to stay within its allocation.

Authorize in-season management by ADFG to prevent exceeding the sport sector's allocation. Conservation efforts need to be equitable amongst all industries.

Prioritize resident sport harvest within the sport allocation, while controlling non-resident harvest to maintain fairness.

In contrast, I strongly oppose Proposals 108 and 113. Proposal 108 seeks to "borrow" troll quota rather than take it, but the end result is the same: non-resident sport fisheries would receive an allocation increase during low abundance periods, which is both detrimental to local communities and unsustainable given the current and likely future Chinook abundance levels. Proposal 113 seeks an uncompensated reallocation that would expand the combined personal-use resident sport fishery and guided non-resident sport fishery, with the majority of the increase benefiting non-resident anglers at considerable cost to Southeast Alaska's coastal and rural communities which depends on this allocation

for food security as inflation continues to price locals out of the region. This proposal would undermine the livelihoods of residents who rely on the troll fishery, further threatening an already fragile industry.

I urge you to consider the long-term impacts of these decisions on Southeast Alaska's fishing communities. Protecting the balance between the various sectors while prioritizing local, resident fisheries is critical for the sustainability and well-being of our communities and generations to come.

Thank you for your time and consideration of my perspective. I look forward to your thoughtful decision.

Sincerely,

Tyler Green

Owner/Operator, F/V Haven

Fish Haven

PC194

Submitted by: Tyler Green

Community of Residence: Petersburg

242 proposal

If you are going to take away all of the commercial quota then the commercial fisherman should be reimbursed at the very least. I do not agree with this proposal unless you have suitcases of cash coming from territorial sportsman's board members bank accounts and handed to the commercial guys and girls just trying to make a living . Thats the only logical answer

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Pete Griffard of Skagway, Alaska. This negatively impact my neighbors. Why are you doing this?

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery

regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Pete Griffard
Skagway, Alaska



Submitted by: Ed Grossman
Community of Residence: Juneau

I support proposal 242, allocating 100% of 11a king crab to locals. I have lived in Juneau 33 years, and personally watched commercial operations over harvest red king crab to the point of requiring severe reductions in local harvest and/or season closures for personal use. Literally thousands of Juneau households participate in the few 11a king crab openers, cherishing the resource. Gear and season length restrictions take much of the enjoyment and success away from locals. I recall the six crab per day seasons with no permit required opening July 1st and ending at the juncture of the fall opening. Commercial harvest openings destroyed this, multiple times, in my decades in Juneau. The facts don't lie. Furthermore, commercial fishermen during one 11a king crab opener, withheld the catch in collusion resulting in twice the harvest allowed. Does this show any respect for the locals or the resource? More than one head should hang in shame over such reckless antics. The damage extends to other areas, such as Seymour Canal, where little personal use occurred. Please do the right thing for the resource and residents. The value of the personal use king crab fishery in 11a far exceeds any temporary commercial gain that devastates the stock for years. Your own data puts this fact in highlighted black and white.

Dear Carlson Van-Dort and board members,

Thank you for taking the time to read mine and everyone's comments on these proposals. I know it's a lot to read and a lot to take in. At the end of all this it's really up to all of you to make these very important decisions. So, I hope you all have time to read everyone's testimony. This is extremely important to all of us trollers and local sport anglers. Name is Greg Haag, owner and captain of F/V Janis M and owner of Janis M fisheries. I'm here to represent the commercial trollers and localized sport fishermen. Alaska has been my home since birth. About to be 39 years of age and Sitka has been my home for 37 of them. As a very young child my dad took me hunting and fishing for as long as I can remember. I fell in love with this lifestyle so when my dad moved away when I was 15, I had the option to stay and live with my mom and grandparents. So, I did. The best decision ever.

At age 13 I hopped on a commercial troller with my mom and was able to experience one of the coolest lifestyles of making a living. I've been fishing ever since. I loved it so much I wanted to experience more fisheries. From ages 16 to 31 I've tendered on two vessels for SE Alaska salmon and fished on 33 commercial fishing vessels in Alaska. I've trolled, tendered salmon, seined, gill net salmon, set net salmon, dingle bar ling cod, long line halibut, sablefish and rock fish. I've crabbed and also tendered cucumbers. Out of all these fisheries trolling was always my favorite. So, in 2019 I leased the F/V Janis M for a season and bought it in 2020. I've been trolling and participating in every king opening since I've been running the boat. One of my friends growing up who happens to be my favorite fishing buddy of mine growing up, also owns and operates a troller. It's in our blood. We both have wives and kids to support so being able to continue catching king salmon is extremely important to us, as it supports our family, pays the bills, keeps food on the table and puts a roof over our heads. For four out of the six seasons I've participated in the troll fishery I've hired my mom, my brother and my sister more than once. My sister will continue to fish with me as she has fallen in love with the fishery. As of this year, 100% of my income will come from trolling. I have decided to stop longline fishing in order to be closer to my family.

I strongly oppose Proposals 108 and 113

Non-resident anglers should be happy with just the experience of fishing for a king salmon in a beautiful place such as Sitka. Especially considering that the next 3 years trollers have to live under a treaty that does not favor Alaskan fishermen. So why should non-resident anglers take a larger percentage of fish when they already receive 20% of the low abundance of returning king salmon. I've spoken to a few local charter captains, friends of mine, and they agree that non-resident anglers should not get more than 1 king salmon annually. This would be and has been a negative impact to the resident sport, subsistence and commercial fishermen and has been economically destabilizing our fisheries. Allowing in season transfer from the troll to sport fishery is also not the answer. This is literally taking money out of the trollers pockets and we have rarely seen a second king salmon opening the last few years. Many trollers, such as I, depend on the second king opening as it potentially saves our season. Bottom line, I think non-resident anglers should

only get one king salmon annually. They get to keep 6 coho a day, 4 black cod, some rockfish, halibut and lingcod. At the end of the day a charter fisherman still pockets the same income regardless of what they catch. My income depends on each pound of fish that I am able to catch. Each fish I bring over the rail, one by one, bled, iced and carefully handled. Each fish counts for me to be able to stay in business.

I strongly support Proposal 109, 110 and 111

These proposals aim to maintain the 80/20 split in the king salmon allocation, bring back in season management of the fishery by ADFG, to ensure the allocation is maintained and put priority on Alaska resident fisherman. I hope the board can utilize one of these proposals or a combination of them to use as a vehicle to amend the current king salmon management plan. The important context is above and especially maintaining the 80/20 allocation and ensuring Alaska residents have access to king salmon. We, as commercial salmon trollers, cannot afford to lose more access to fish. As a resident of a rural community, I cannot afford to lose access to subsistence and sport fishing for king salmon, as my family relies on this as a staple food source.

The troll fleet will continue to fight for our livelihood. In the recently won lawsuit against the Wild Fish Conservancy, the courts sided with the troll fishermen and cited the importance of the fishery for rural Southeast Alaska communities and residents. I hope that one day my 1.5 yr old son will want to come fishing with me and that he can have the opportunity to become a commercial fisherman if he so chooses. Here is the F/V Janis M. The girl in the pictures below is my little sister whos live with us. She sometimes fishes with me when I have other crew to help keep an eye on her and weather has to be really nice! She absolutely loves fishing!





Submitted by: Greg Haag
Community of Residence: Sitka

Oppose 156

I do not support due to low coho prices in the previous years, chum fishing has been a very valuable asset to my income for trolling. Chums fishing usually takes place after the king opener as chums start swimming into the sound. its nice because it divides the troll fleet up which leaves more room in the ocean for trollers that want to target coho's. I like chum trolling because it keeps me close to my family and keeps my fuel costs down. I don't have to go looking for the fish which saves me a lot of fuel costs. They swim right to the sound and easier to target.

Oppose 202

I do not support this proposal and I'll tell you why. First of all the proposal is confusing and needs more clarifying. From what I understanding in this proposal is when I leave the dock to head out to the fishing grounds which is approximately a 22 hour run from Sitka, I'm only allowed to bring 1 train on board. So this means if I lose my train while engaged in fishing I have to run 22 hours back to Sitka to pick up another train? This is not an efficient. That burns up lots of fuel and I lose two days of fishing. This fishery on average has only been open for 2.5-3 days and that area closes for the rest of the year. I've participated in the dingle bar fishery in the same area on 4 different fishing vessels. Dingle bar is a very unique way to catch fish and its very easy to lose gear. You can get hung up and lose your gear in the matter of seconds. I've seen it happen before. The years I've participated in this fishery are spread out in the last 15 years and every boat fishes the same way. One train in the water, and every boat always used flashers above the train to help attract the fish. This fishery has had the same regulations for years. Why change it now? I someday might want to participate in this fishery on my F/V but if these rules change I wont be able to justify going fishing with just 1 train.

Thank you for taking the time to read these comments I have presented.

Respectfully, Greg Haag, F/V Janis M

Submitted by: Adam Hackett

My families business (Fish and Family Seafoods), our crew, and fish buyers

Community of Residence: Sitka, AK

Thank you, board chair and members of the board, for your time and dedication to the people and resources of our State; the institution you all are upholding is one of our great assets.

I strongly support proposals 109 and 110 in their efforts to:

- Keep sport King harvests within their allocation by allowing (mandating) in season management
- maintain the 80/20 allocation split between commercial and sport harvesters
- share the burden of conservation needs at all levels of abundance.

and

- prioritize resident sport harvest over non-resident sport harvest while remaining within sport harvest allocation

I strongly OPPOSE proposals 108 and 113

king salmon harvest is not critical to a vibrant nonresident sport fishing industry

Board of Fish has been one of the clearest examples of democracy I've had the opportunity to participate in. I've experienced both gratitude and pride towards the founders of BoF for as long as I've been aware of BoF; which is almost as long as I've been harvesting King Salmon commercially.

My name is Adam Hackett. I've fished every July King salmon season since I was 13 years old when my neighbor Bill was so extremely thoughtful, as to offer me my first job on his troller/longliner Tania Dee. Bills family along with ours and four other families lived on a small Island outside of Sitka. Four of the six families were commercial fishers, trollers and longliners; my dad a float plane pilot and one sport charter fish boat operator were the outliers.

From a young age I saw the cycles of life and commerce from the shores of our small Island. Whales, sea lions, herring, seiners, longliners, trollers, cruise ships, charter boats passed by as the seasons progressed. It was abundantly clear to me and only natural that I should feel this rhythm deeply and identify myself as a fisherman.

In those days (early 1990s) there were many many fish boats in town, families that fished, kids that missed school for fishing and many more kids in general. The Troll closures were some of the busier days in town with bonfires, BBQs crews turning boats around, shoveling ice etc.

There were a few cruise ships and some charter boats too, but they weren't dominant or overwhelming. It was a novelty to see charter boats on the fishing grounds! Through unchecked expansion the nonresident sport fishing industry has been appropriating our community for the last 30 years.

Fast forward to the 2020s: there are so many charter boats that we as trollers cant fish our most productive troll drags in our (now very short) king season. So many vans full of charter clients and totes of fish coming up the dock every day all summer long, that it is difficult to find a place to park and unload gear or groceries from truck to boat. It is now a novelty to find a place between Forrester Island and Icy Point without charter boats! It is also difficult to find available year-round family housing in our communities largely due to demand from seasonal visitors, namely non-resident charter clients and operators.

To those who would suggest families are leaving Southeast Alaska because they want to; or that trollers aren't participating in harvesting Kings because they prefer to do other things, I suggest looking around with a question in mind: are these people being pushed out? is their lifestyle being killed off?

I strongly believe that the answer to this is YES!!! As has happened in so many desirable destination locales, we are being displaced by nonresident operators and clients, primarily in housing and fisheries. This seasonal influx does not allow for earned revenue to stay in our communities and it does not keep children in our schools. Year-round commercial fisheries are one of the oldest and most important economies of our coastal Alaskan communities and there are none more quintessential in Southeast than Trolling, for King salmon.

My family's business pays out about \$30,000/ year split between two full time Sitka resident crewmembers from the King fishery alone. We hire local maritime trades people and buy equipment at local stores to the tune of about \$50,000/ year. We pay unloaders to help us offload Frozen at Sea King Salmon, this is about \$1200 in cash to young local laborers per offload (which the last couple years has only happened in July instead of again in August). We pay to store fish at the community cold storage and pay the local trucking and barge company to move it around. After all of this we typically take home \$50,000- \$80,000 from a normal king salmon season with two openings. Of which nearly 100% is spent locally.

King salmon are a critical part of my family's business, the livelihood of our crewmembers, and they fuel a significant part of our family's contribution to our local economy. There is long standing infrastructure and industry reliant upon business like ours.

In summary,

I strongly support proposals 109 and 110 in their efforts to:

-Keep sport King harvests within their allocation by allowing (mandating) in season management

-maintain the 80/20 allocation split between commercial and sport harvesters

-share the burden of conservation needs at all levels of abundance.

and

- prioritize resident sport harvest over non-resident sport harvest while remaining within sport harvest allocation

I strongly OPPOSE proposals 108 and 113

I believe it is very important to maintain space for our community to support and nurture young people to enter the troll fishery rather than discourage them by reallocating from the troll fishery to the insatiable appetite of nonresident sport fishing.

In Sitka, many residents utilize sport King fishing as an ad hoc subsistence harvest, with as much history and importance as the commercial troll fishery. The resident fishery must also be maintained and defended in the face of unchecked and unmanaged non resident expansion.

In the same summer I first went trolling at age 13 I had the good fortune to spend a few weeks working at Baranof Wilderness Lodge (BWL) at Baranof Warm Springs. I highly regard Mike Trotter and the lodge he has run for many years and eagerly spent parts of many summers working there as a youngster. Due to location these operators have little opportunity to harvest Kings, each one is a highlight to the season. It appears BWL has had a vibrant history, and I can tell you firsthand that they have many enthusiastic repeat customers, who have likely harvested very few if any king salmon. I have heard at BWL and from other sport fishing guides numerous times that sport fish guiding is the way of the future, because killing fish is not required to make money fishing.

Furthermore, it is abundantly clear based on the disproportionately high harvest of King salmon by the Sitka charter fleet relative to King harvest levels of Ketchikan or Juneau fleets and the relatively proportionate health of these fleets that king salmon harvest is not critical to a vibrant nonresident sport fishing industry.

To my knowledge there are no mechanisms beyond these allocative proposals and your (BOF) vote to manage the rapid growth of the nonresident sport industry and its costs to our community. While I certainly support a sustainable level of nonresident sport harvesting as part of our economy and community, it must no longer come at the expense of the troll or resident sport fishery. Please use your discretion to maintain our fleet structure and stop the slide from some nonresident sport fishing to all nonresident sport fishing.

Thank you for your time in reading my comments and thank you for your service to our people

Adam Hackett

Sitka, AK



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Jan. 2, 2025

Board of Fisheries:

The Haines Borough strongly opposes Fisheries Proposal 156, reducing pink and chum salmon egg take by Southeast Alaska hatcheries by 25 percent. This proposal is scheduled for Board of Fisheries consideration at its meeting starting Jan. 28.

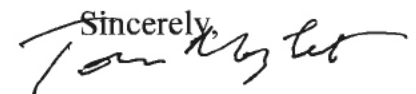
Hatchery-generated chum salmon comprise 60 to 80 percent of the value of the annual Lynn Canal drift gillnet harvest value, supporting scores of families and fisheries businesses in northern Southeast Alaska. Raw fish tax revenues from the Lynn Canal gillnet harvest account for annual appropriations of up to \$400,000 to our borough.

This proposal would result in direct and immediate losses to our fishermen and businesses in Haines that already are struggling due to recent market fluctuation, as well as significant revenue loss to our local government.

While fishermen and citizens in our community remain concerned about the future of wild fish stocks – including the viability of the Chilkat River king salmon return – Proposal 156 provides no conclusive proof that hatcheries have been detrimental to those stocks, only conjecture about “unanswered questions” and “potential negative impacts.”

Unless and until science proves a direct link between hatchery production and survival of wild stocks, our community stands steadfast in its support of existing hatchery programs, and at current production levels. These programs have been in place for decades and have withstood the test of time.

Further, the Haines Borough calls on the Board to commit to science-based, objective assessments for hatchery management, working in collaboration with Alaska Department of Fish and Game, industry leaders, and the hatchery community.

Sincerely,


Tom Morphet
 Borough Mayor

Submitted by: Monica Hall

Community of Residence: Kent, Washington

I support Prop 179, for protecting herring egg harvest areas and I care about the harvesters safety.
