



January 13, 2025

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC opposes Proposal 156

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

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC employs 54 full-time staff members and approximately 75 seasonal workers with an annual operating budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. These taxes and cost recovery sales fish are derived solely from Area E permit holders and PWSAC operations. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors. Since inception, PWSAC has returned on average 70% of fish produced to common property fisheries.

Southeast Hatchery Association produced salmon contribute significantly to Southeast Alaska fisheries and regional economies. Between 2012 and 2017 Southeast fishermen (all gear types) earned an average \$44 million in ex-vessel value¹. Southeast Alaska hatcheries account for 2,000 jobs (annualized), \$90 million in labor income, and \$237 million in total annual output, including all multiplier effects.

Southeast hatcheries contributed approximately 44,770 sport-harvested coho and more than 6,000 sport caught chinook between 2012-2016. Sport fish programs are funded and paid for almost exclusively by the sale of returning hatchery produced chum salmon.

Though it can be difficult to quantify, Southeast hatchery produced salmon generate significant local revenue through raw fish, property, and sales taxes paid by commercial fishermen, charter fishermen, seafood processors, hatchery associations, and support sector businesses and employees.

¹ Economic Impact of Alaska Salmon Hatcheries (McDowell Group 2018)

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The cultural, social, and economic benefits of Southeast Hatchery produced salmon to all user groups have been realized for nearly 50 years. Proposal 156 imposing an arbitrary 25% reduction of hatchery produced chum and pink salmon production would destabilize all benefits Southeast Hatcheries provide, affect every user group, and alter harvest allocation.

Proposal 156 –5 AAC 33.364 Southeastern Alaska Area Enhanced Salmon Allocation Management Plan.

Proposal 156 looks to reduce hatchery permitted eggtake levels of pink and chum by 25%. This proposal in similar form has asked the board to reduce hatchery eggtakes on at least 6 other occasions, all with the same unsubstantiated claims.

ACR 2 – Submitted by Virgil Umphenour at the October 2018 BOF Work Session sought to cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000 (5 AAC40.XXX). **Failed 2-5 (Public comment was 11 in favor and 116 opposed)**

Proposal 54 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting sought to amend the PWS Management and Salmon Enhancement Allocation Plan to specify hatchery chum salmon production by reducing to 24% of year 2000 levels. **Failed 0-6 (Public comment was 5 in favor and 94 opposed)**

Proposal 55 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish meeting sought to amend private-non-profit hatchery permits to decrease allowable hatchery production to 75% of year 2000 levels. **N/A 6-0 (Public Comment was 4 in favor and 102 opposed)**

Proposal 43 – Submitted by Fairbanks Fish and Game Advisory Committee at the November 2023 Lower Cook Inlet Finfish meeting sought to amend the Cook Inlet Salmon Enhancement Allocation Plan and reduce hatchery production to 25% of the year 2000. **Failed 1-6 (Public comment was 6 in favor and 84 opposed)**

Proposal 59 – Submitted by Fairbanks Fish and Game Advisory Committee for the 2024 January Kodiak Finfish meeting. Reduce hatchery production to 25% of the year 2000 production. **Pulled due to lack of regulatory conformity.**

Proposal 78 – Submitted by Virgi Umphenour at the December 2024 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting sought to amend private-not-for-profit hatchery eggtake permits by 25%. **Failed 1-5 / 1 absent (Public comment was 20 in favor and 225 opposed)**

Each time, the board has rejected the proposal that would dramatically affect fishermen’s small businesses, families, as well as sport, subsistence, and personal use programs across large regions of Alaska. **The harm caused by passing this proposal is staggering, known, and quantifiable. There is no empirical or mechanistic evidence suggesting that reducing Southeast hatchery production of chum and pink would lead to positive change for other species in or outside Southeast Alaska.**

Additionally, if any version of these proposals were passed at Board of Fish, it would bring uncertainty to hatchery programs and permitting both in terms of cuts and additions to hatchery programs. This alone is reason

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enough to maintain the long standing and iterative process of department and commissioner hatchery permitting coupled with the public regional planning team (RPT) process. The RPT has an advisory role to the commissioner allowing users of the resource within each region to determine what fishery enhancement is desirable. The commissioner is then able to determine what is appropriate within the department mandate to protect natural production.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program and supports the current laws and regulations that guide it. PWSAC also supports the iterative process involving department staff, hatchery operators, stakeholders, and the public. In the absence of compelling data or analysis supporting a reduction for conservation reasons, any significant changes need to be thoroughly examined by hatchery board members for hatchery needs and consider stakeholder input to ensure a well-informed decision.

Currently, the Alaskan seafood industry is in crisis due to increased production costs and global market uncertainties. This proposal would certainly have an additional negative impact on the viability of salmon processing operations in regions with pink and chum hatchery programs.

Over the last 50 years Southeast aquaculture programs have been an enormous success providing cultural, social, and economic benefits to all user groups. The proposer has offered no empirical evidence to suggest harm by pink and chum hatchery programs, but it has been laid bare here the absolute harm that would knowingly be brought by the passing of Proposal 156.

It is important to note that hatchery associations, ADF&G staff, and BOF members have spent considerable time and money addressing these repeat proposals. Author and word changes have not brought any new or substantive information to the table. There is no supporting data that suggests these repeat proposals would help the intended stakeholders, but it is clear a proposal such as 156 would definitively harm many in the process.

PWSAC **opposes Proposal 156** and would respectfully ask that **the board reject Proposal 156** and reject any other request to reduce hatchery production that would destabilize the cultural, social, and economic benefits Alaska's salmon hatchery programs have provided all user groups for nearly 50 years.

Sincerely,



Geoff Clark
General Manager/CEO

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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 Prisciandaro of Haines, Alaska. I am a commercial 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.

A reduction of hatchery production would adversely impact fisheries in southeast Alaska. As a commercial gillnetter hatchery fish help our fleet by providing a resource that we can fish to provide a valuable commodity to the domestic and world markets. The benefits from the current hatchery production can be seen at many levels throughout the communities of southeast Alaska wither it be earnings of a fisherman and crew, or a visitor getting to fish for and Alaska salmon and sharing their experience with others upon returning to there home town. Please vote to keep the current hatchery production levels.

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,

William Prisciandaro

[REDACTED]

Haines, Alaska

Submitted by: Tarren Privett

Community of Residence: Wrangell, Alaska

My name is Tarren Privett. I am born and raised in Wrangell, Alaska. I have been a commercial fishing crewmember most my life and it is my sole source of income. I am writing today to strongly oppose proposal #242 and I am in support of proposal #243.

I am strongly opposing #242. If the 11A red king crab get reallocated us commercial fisherman and crewmembers will never see a red king crab fishery again. The Juneau area is a large part of the red king crab biomass. Taking the commercial share out of that biomass will be unjust nor fair.

I fully support proposal #243. If there is a surplus of crab it would be extremely beneficial to the commercial fleet. Times are getting harder to make a living in this industry and any opportunity to make extra \$ is very welcomed.

Please consider all the fisherman, their families, and their crews when voting on proposal #242, and #243. Livelihoods and investments are very much at stake here. This decision could literally decide if I am personally going to continue in an industry I love but am having a harder time making a living at it. Please oppose proposal #242 which I strongly am and please support proposal #243 which I am. Thank you for thinking of us who are making a living in the commercial fishing industry.

Tarren Privett

Crewmember

Wrangell, Alaska



PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

1900 W Nickerson St., Ste. 320 ■ Seattle, WA 98119 ■ Tel: (206) 283-7733 ■ Fax: (206) 283-7795 ■ www.psvoa.org

January 14, 2025

SUBMITTED ELECTRONICALLY

Alaska Board of Fisheries
P.O. Box 115826
Juneau, AK 99811

**Re: Support Proposals 157 and 158;
Oppose Proposals 134 and 156**

Dear Board of Fisheries Members:

The Purse Seine Vessel Owners Association ("PSVOA") respectfully submits the following comments regarding the above-referenced proposals which are before the Board at the upcoming Southeast-Yakutat finfish meeting in Ketchikan. PSVOA is a commercial fishing organization having members that participate in the salmon purse seine fishery in Southeast.

Support Proposal 157

In most years, the Southern Southeast Regional Aquaculture Association (SSRAA) takes all Chum salmon returning to Burnett Inlet for broodstock and cost recovery. However, there are years when the Chum salmon return exceeds SSRAA needs for broodstock and cost recovery. The establishment of a terminal harvest area (THA) in regulation allows for the commercial harvest of Chum salmon in such years.

Support Proposal 158

PSVOA supports this proposal which clarifies the fishing boundaries of the Hidden Falls THA without significantly changing the open fishing area.

Oppose Proposal 134

PSVOA opposes this proposal which seeks to expand landing and retention requirements for Chinook salmon by purse seine permit holders and to establish penalties for violating such requirements. First, the Board lacks the authority to promulgate rules that impose fines or other forms of punishment. Such authority rests solely with the legislature. Accordingly, the Board must reject this proposal as written. Second, rather than seek to penalize or sanction the purse seine fleet, ADF&G should continue to work collaboratively with purse seiners during periods of Chinook non-retention in complying with ADF&G's guidance to quickly release Chinook salmon in a manner that minimizes mortality.

January 14, 2025

Page 2

Oppose Proposal 156

PSVOA strongly opposes this anti-hatchery proposal. Proposal 156 is nearly identical to other anti-hatchery proposal which the Board soundly rejected at the Prince William Sound finfish meeting in December. In permitting hatchery operations, the Alaska Department of Fish and Game (ADF&G) already considers many of the concerns raised in this proposal, including the need to minimize interactions between hatchery origin and wild salmon and the need to ensure harvest practices targeting hatchery produced salmon do not negatively impact wild fish.

The Alaska Hatchery Research Project is an ongoing research project designed to investigate the question of whether straying of hatchery origin salmon adversely impacts wild salmon stocks, and to what degree. At the conclusion of the study, the results will be published and peer reviewed. The results and conclusions derived from the study will provide ADF&G with an objective assessment of wild/hatchery salmon interactions. Any action taken by the Board to require reductions in hatchery production at the present time would be premature and not based on best available science. Indeed, there is no science supporting the proposed 25% production. Such a number is completely arbitrary. Moreover, if adopted, the proposed hatchery production cuts would have a significant negative economic impact on the commercial salmon industry as well as salmon-dependent communities in Southeast that rely on fisheries tax revenues to fund essential public services.

In sum, PSVOA respectfully requests the Board **adopt** Proposals 157 and 158, and **reject** Proposals 134 and 156. Thank you for your consideration of PSVOA's comments regarding these proposals.

Very truly yours,

Robert Kehoe

Robert Kehoe, Executive Director
Purse Seine Vessel Owner's Ass'n

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 Rob Raymond and I am a commercial fisherman. I spent seven years working in the southeast seine fishery. It was abundantly clear that without hatchery fish, this fishery would struggle to survive.

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,

Rob Raymond



Submitted by: Kelly Reamer
Community of Residence: Ketchikan

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: Ryan Reeves
Community of Residence: Wrangell

Proposal 156

I strongly oppose this proposal, cutting 25% of production of chum and pink production would cause catastrophic economical impact on the aquaculture associations, commercial fisherman, resident sport fisherman, charter business's, along with all business's in each town. This proposal uses aquaculture association chum/pink productions as a scapegoat. All fisherman sport, commercial, and charter have been frustrated with the salmon returns across the state. Although times have been tough, I can only think how bad it would be without enhanced fish. This Proposal aims at cutting specifically chum and pink production, but misses the fact that these chum and pinks are ultimately are the fish that pay for king and coho production these aquaculture association offer. We need to work with the aquaculture associations and not try and shut them down. Ultimately if we didn't have hatcheries the wild stocks could not support a commercial, sport, charter that supports all the towns in SE Alaska. Another positive to hatcheries, is that this proposal fails to recognize is, by producing fish it takes the pressure and effort that would be directed towards the wild fish.

Submitted by: Noah Reishus-O'Brien Reishus-O'Brien
Community of Residence: Juneau

I'm commenting on proposal 242 and 243. 11A has a massive bio mass of crab and should be open to commercial fishing. There is lots of sports areas open all year to catch red crab outside of 11A that are open and have crab. As a resident of Juneau, I know of areas outside of 11A that there is king crab available and it should be shared more.

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 Dillon Renton, I am a captain for the Fireweed Lodge based out of Klawock, Alaska. I appreciate the opportunity to create public comment on proposals that you will be deliberating soon.

Of the proposals brought to the Board, here are those that I would like to support/oppose:

Support: 108,122,123,131,134,159-163, 193, 206, 207, 208, 211

Oppose: 104, 106, 107, 109, 110, 111, 114,115, 116, 117, 118, 119, 120, 125, 126, 127, 128, 130, 140, 141, 164, 203, 205, 209, 210

Reasoning for Support of 108

108 would have positive impacts from not only the charter fleet of SE Alaska but would also largely benefit the communities and economies in the area.

Reasoning for Opposing 114, 115, 116, 117, 118

Adjustment of NR limits in all or earlier tiers of sport-fishery seasons will have large scale impacts on the charter fleet and communities surrounding sport fishing in Southeast. Within the earlier parts of the season (May and June) we rely on the 1/day, 3/year King limit to attract guests. With further restrictions on rockfish, ling cod, and halibut, as well as a lack of Coho in that timeframe, the early tier of the charter season has become even more dependent on better king harvest opportunity. Without such, our positive impacts to local economies could be impacted.

Reasons for Opposing 119, 120

In-week closures would be another detriment to many lodge-based operations. Guests and families would likely attempt to avoid dates landing on closures and leave lodges with scant bookings in the first half of the season. We, as a community of sport fishing captains, have seen this already with the in-week closures of halibut harvest. It would be hard to convince guests to accept another closure for future trips.

Reasons for Supporting 206, 207, 208

If populations of Yelloweye and DSR are healthy enough for certain levels of harvest, it would be positive to reinstate catch opportunity for residents and non-residents depending on the species.

In closing, I would like that thank the Board for the opportunity to provide written comment. Hopefully, some of these points can be considered when making decisions on the proposals at hand.

Thank You,

Dillon Renton

Captain, Fireweed Lodge

Klawock, AK

Submitted by: Isaac Reynolds
Community of Residence: Sitka

Thank you for reading my comments.

My name is Isaac Reynolds, I live in Sitka Alaska. I am 39 years old, married to a local high-school teacher and father to 3 children under 8 years old. Born and raised in Sitka, I own a house and I've spent time in small communities around southeast Alaska. I have been fishing in Alaska my entire life and owned my own commercial fishing vessel since 2010.

I am writing to support proposals 109 and 110 with RC amendments, and strongly oppose 108 and 113. I request the board maintain the 80/20 allocation split between the troll fishery and sport sector. Please Authorize in season management by the state to ensure sport allocation is not exceeded, and prioritize resident over non-residents in sport fishing.

I support the chinook allocation staying with trollers vs going to non resident anglers for a number of reasons.

Main reason: My income as well as many others depends on king salmon! We have bought expensive state permits and paid thousands in fish taxes every year. With a high percentage of money staying in state, many of the smaller community's are supported by fishing/trolling.

Community: Trollers aren't rich but we eat well and most of us share the wealth. Rural communities enjoy a rich diet of salmon provided by local fisherman. It's a well known tradition in Sealaska. Many smaller communities rely on this food source 100 percent. My father was a carpenter growing up in the 90sand didn't know how to fish. Luckily our church had an old man who made sure everyone ate plenty of salmon. He taught many young children how to catch and clean fish.

Pride: trollers take pride in bringing home beautiful, well cleaned, well chilled fish. They are frozen and processed at the highest standard. Non resident fish quality is a far cry from this. There is no quality standards, and the processing rooms are not great.

The list could go on but Im going to conclude by saying thank you.

Isaac Reynolds F/v Alaska

PC411

Submitted by: Shane Ring
Community of Residence: Pelican

I'm writing in support of Proposal 132, measuring King salmon via the fork at 26.5 inches. (Or whatever the average length a 28in king is).

I realize that this proposal is for trollers, but I believe it should be expanded to everyone. As a guide and Lodge co-owner, I've seen so many people measure King salmon wrong. And thus tickets handed out to people who can't correctly measure. Depending on how spread out the tail is, it can vary by half an inch or more. If you change the measure to the fork, it just makes it simpler and "idiot proof". I'd go so far to say you should just make the requirement 28" to the fork, but people would flip out.

Side comment- I see many proposals seeking to reduce charter days fished, and reduce annual non resident limits. Personally, instead, I think you should consider taking a similar approach with halibut. Where halibut can only be retained on one permit/boat per day. Instead, only allow the retention of salmon on charter vessels, and the guide, to once per day.

This will reduce kings caught in cruise ship towns like Sitka who go out for a few hours. And do 2-3 trips a day.

Most remote lodges keep guests 4-7 days. Thus there's already going to be multiple days we don't target king salmon even at the level of three retained until July 1.

PC412

Submitted by: Trevor Rostad Ristad
Community of Residence: Kake

I do not

Support 242 the sport fleet is taking already so much from the commercial

Fleet ...

PC413

Submitted by: Tracy Rivera
Community of Residence: Tenakee Springs

I am a commercial power troller, and subsistence fisherman.

I support: 110, 111, 116, 117

I oppose: 242, 156, 108, 113

Submitted by: Caleb and Jessica Robbins
Community of Residence: Sitka

Dear Chair Carlson-Van Dort and Board Members,

We are Caleb and Jessica Robbins: a young commercial fishing family that direct markets our catch, and residents of Sitka. We live aboard our fishing boat for seven months each year, along with our two year old son -- and spend the other five months direct marketing our season's catch to families, restaurants, brokers, and retailers. We are active participants and permit holders in the SE Shrimp fishery, Dinglebar (directed lingcod) fishery, SE Power Troll fishery, and NSEI Sablefish fishery. All these fisheries together contribute to our livelihood on the water, each playing a vital role in keeping our growing family afloat.

We have concerns and comments with many proposals, and will list each by number below. But we'll do our best to summarize them here, too. Thank you for taking the time to read the perspective of a young commercial fishing family, doing our best to continue carving out a livelihood on the water.

Our highlights:

- Access to chinook salmon is a vital aspect of maintaining a living as a trollers, and as a result: adding resilience to the fragile economies of Alaska's costal communities. The sport sector is an incredibly important piece of Southeast Alaska's economy puzzle, too -- but chinook salmon access should not be the end all, nor the ultimate goal, of the charter fish industry. The raw beauty Southeast Alaska -- and the multiple other species available for sport harvest -- are more than enough reason for visitors to come to Alaska. To preserve the viability of the troll fishery, we humbly request the board:

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.

- We do not believe that increased allocation or bag limits in the sport sector will have measurable positive impact in the sport industry, though it may result in a measurable negative impact in the commercial industry. As the world's population grows, the charter industry should consider transitioning from a "meat harvesting, fill-the-freezer" mentality, and evolve towards a "come to Alaska, enjoy the scenery, harvest a few different types of fish" mentality. It is up to sport industry leaders to rewrite this narrative for their clients, and showcase the beauty this state has to offer, regardless of bag limits.

- Biologically, a May shrimp fishery is ultimately in the best interest of the resource. It's too soon to make any bold assessments, we need more cycles to determine how stock health is adapting to the season change from October to May -- though many prawn fisherman report a reduction in catch, that may be due to a simple learning curve.

List of proposals that effect our family:

Proposals 109 + 110: We support with amendments to maintain the current management plan structure

Proposals 108 + 113: We oppose any reallocation or "borrowing" of chinook salmon from the primarily Alaska resident troll fisher to an expanding non-resident spot fishery.

Proposal 156: We oppose hatchery egg take reduction -- the evidence supporting an "at carrying capacity" ocean is weak, while the evidence for positive economic impact of a thriving chum fishery is strong. Additionally, a robust chum fishery:

- Lowers pressure on chinook and coho stocks, allowing the troll fleet to diversify
- Is accessible for smaller boats, since chum fisheries are primarily in "inside waters"
- Remains accessible regardless of weather, for the most part

Chum access is an integral aspect of maintaining a resilient troll fleet, and to arbitrarily lower hatchery production by 25% without any real data would place an undue hardship on the local, small boat fleet.

Proposal 194: We strongly support ADFG's proposal to lower the escape ring size in NSEI Sablefish pot fishery to minimize catch of immature fish, and maximize retention of larger, more valuable fish.

Proposal 198: Oppose increasing the bag limit for sablefish in the sport sector. Not because the sablefish stock isn't thriving, but because -- to put it simply -- continuing to increase bag limits is reinforcing a "fill the freezer!" mentality in sport fishers. The average sport fisher and their family cannot consume four sablefish (in addition to the rest of the harvest they bring home), and they certainly aren't going to eat six. Two additional sablefish will not further enrich their Alaska experience, nor create higher returns for their guide/host.

Proposal 199, 200, 201, 202: We support enhanced management of the directed lingcod fishery, and increased opportunity for fishers to participate safely.

Proposal 203: Oppose -- As stated in proposal 198, an increased bag limit will not enrich the experience of non resident anglers, nor drive higher returns for guides.

Proposal 224, 225: We strongly oppose - We are participants in the SE Pot Shrimp fishery, and though the transition to a May 15 opener was inconvenient to our schedule, it does make biological sense. We are in support of maintaining the May 15 opener, in hopes of seeing a stock rebound similar to British Columbia's. Anecdotally, many prawn fishers have experienced slower-than-normal fishing since the rescheduling from October 1 to May 15. However, in our opinion, we as prawn fishers are still working to find the "new normal", and learning to harvest prawns in their non-spawning, less conglomerated behavior pattern. It'll take time to see the effects of the May 15 opener -- good or otherwise. Please give the resource, and it's fishers, time to see how this change plays out.

Proposal 226: Strongly oppose - Similar to above, we cannot yet know how the transition to a May 15 opener has effected the stock. We need more time to gather baseline data before making any drastic management decisions.

Thank you for your time, energy, and care in managing our state's resources.

With gratitude,
Caleb and Jessica Robbins
Fairweather Fish Co. LLC

PC415

Submitted by: Andrew Roberts
Community of Residence: Sitka

My name is Andrew Roberts. I am 74 years young. I consider myself a traditional harvester and herring protector. Been harvesting herring eggs on hemlock and kelp for about 40 years. There have been some years where i didn't have access to a boat. I have seen a lot of change in areas of spawn. I would like to see our local tribal government have the clout to have the control of all aspects of the herring fisheries. We have the knowledge to make herring abundant again. I would like more information given to the groups that pay for the herring eggs in the skein form.

PC416

Submitted by: Ralph Roberts
Community of Residence: Port Hardy

I oppose 156

PC417

Submitted by: Alexis Roberts Keiner
Community of Residence: Anchorage - Los Angeles

As a young person Living in Juneau, Alaska I benefited greatly from my time in Sitka. I was a scholarship kid to Sitka fine arts camp, Which was located on the Mount Edgecombe campus.

I was very lucky to know, elders such as Mabel Pike, and Katchemak Bay / New Yorker Clem Tillion.

I think of them often.

Appreciate the opportunity to comment And hope this comment serves as a land acknowledgment in action.

Thank you

Alexis Roberts Keiner

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

Dear members of the Alaska Board of Fisheries,

I am Rick Rocheleau the Owner of Alaskan Ohana Sportfishing located in Craig Alaska on Price of Wales Island. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect my business as well as different user groups in our region.

I oppose any proposals that set a two-king salmon annual limit at the charter season's start. There are several king salmon proposals that suggest lower annual limits for non-resident anglers starting off the season. When bag and annual limits for kings were better and we had better regulations for halibut, rockfish, and lingcod, mid-May through June was the easiest part of the season to book. Now it's the most difficult. There's little opportunity left the first half of the season, and we can't afford to go any lower and expect to keep customers coming.

Best case for my charter business, would be to allocate a larger portion of our king catch at the beginning of the season. If a management change were implemented that set a two-king annual limit at the season's start, it would have a dramatic effect on my business. It would be better if you took away King opportunities in middle of July and August

I had to adjust my marketing strategies already in response to lack of early-season opportunities. Offering GAF halibut and discounted prices.

As an owner/operator my family depends on my fishing income for a living. My charter business directly contributes to and supports my local Craig community. If the opportunity to harvest King salmon decreases for my clients, it would affect my tax contributions, local hiring and mine and my customers local spending. (airlines, hotels, restaurants, marine fuel, taxis, sporting good store, city taxes, local shops, grocery stores, boat repair shop, fish processors, etc.)

Submitted by: Matthew Romaine
Community of Residence: Craig

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 Matthew Romaine. I am a Sport Fishing Guide at Waterfall Resort on Prince of Wales Island located in Craig . Thank You for your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me as well as so many other in our region in regards to the economic impact generated from Sport caught fish.

I support proposals 108,113,122,123,131,134. Insures guest interest and desire to continue to patronize Lodges in SEAK

I oppose proposals 109,110,111,114,115,116,117,118,119,120. Proposals 119 and 120 will most definitely impact bookings and turnoff clients, there is no science supporting these proposals.

I have been guiding in SEAK since 2008. I personally spend an average of \$2k per year in SEAK. I am one of many guides who Travel (fly, stay in hotels, eat out, buy gear,and spend time at layover destinations). I generally guide 70 to 80 guests per season that spend on average \$5k per person at Waterfall Resort for the opportunity to catch an Alaskan King Salmon, they too spend time in a layover (Ketchikan) spending as much or more than those of us that love working in SEAK. The adverse ripple affect of not being able to Catch an Alaskan King Salmon is far reaching. I have become reliant on my Sportfishing income and not being able to guide in SEAK would create a significant financial hardship on my family.

I thank the Board for considering these points when making allocation decisions to ensure that sport fishing remains a viable and valued part of Alaska's fishery management. Thank you for your time and dedication to preserving these resources.

Sincerely.

Matthew Romaine

Submitted by: Chiara Rose
Community of Residence: Yakutat

To the Alaska Board of Fish,

As a resident of Yakutat, I am writing to express my strong support for protecting the last remaining healthy herring stock in Southeast Alaska. While it may seem that Yakutat is far removed from the Sitka Sound herring stock, this couldn't be further from the truth. The herring stock of Sitka Sound is part of an interconnected ecosystem that has been historically mismanaged across Southeast Alaska. It is critical that we do not allow the Sitka stock to suffer the same fate as other herring stocks that have been depleted or remain in recovery.

Today, you have a choice: either protect the Sitka Sound herring stock for future generations or risk losing it forever. The people of Southeast Alaska, including Yakutat, rely on this stock for subsistence. Herring plays a central role in our traditional foods, cultural practices, and community gatherings. From our freezers to our tables, herring sustains us during 40-day ceremonies, koo.eeks, memorials, family gatherings, and beyond. It even feeds our relatives outside Alaska, such as my auntie in Washington state who receives eggs from Tlingit and Haida. The importance of herring has only grown as economic challenges deepen and food security becomes an increasing concern in our region.

I urge the Board of Fish to adopt measures that prioritize the health of the herring stock, subsistence harvests, and long-term sustainability:

1. Support Elements of Proposals 173-177: These proposals offer increased protection to spawning herring by raising the minimum biomass threshold, reducing the harvest rate, and establishing strict harvest caps for the commercial sac roe herring fishery. These actions are critical to ensuring that subsistence needs are prioritized and preventing any high-volume, non-food herring fishery in Sitka Sound.
2. Support Proposal 190: Recognizing Tribal sovereignty and expertise in co-managing subsistence resources is essential. Establishing a co-management framework will empower Tribes to protect this vital resource for their citizens.
3. Support Proposal 179: Protecting an important subsistence harvest area will ensure that traditional harvesters can continue to provide for their families and communities.
4. Support Proposal 181: Minimizing herring mortality from test sets is a simple but necessary step to reduce unnecessary waste and support sustainable practices.

The decisions you make today will have lasting impacts on the cultural, ecological, and economic health of Southeast Alaska. I urge you to prioritize the protection of Sitka Sound herring and to listen to the voices of the communities that depend on this vital resource. Please do the right thing and safeguard this resource for future generations.

Thank you for your time and consideration.

Sincerely,

Chiara Rose

Resident of Yakutat, Alaska

PC421

Submitted by: Paul Rostad

Community of Residence: Kake

Hatchery's are a big part of Seiners season. We need more fish not less. I appose 156

PC421

Submitted by: Paul Rostad

Community of Residence: Kake

I am a commercial Fisherman and a life long resident of Kake AK. My crewman are all residents of Kake also. We rely on fishing to support our family's. I oppose Proposal 242

by JUNEAU TERRITORIAL SPORTSMAN INC. This proposal is self serving to benefit themself while disregarding the commercial Fishing industry. Proposal 242 is unacceptable. The fishing industry is in crisis we need more income not less. This proposal is trying to put us out of buisness it hurts our community and takes away jobs that supports families in Kake and other communities.

I support 243 proposed by ADFG who to their credit worked with Industry, SEAFA, PVOA, and Processors to come up with a fair plan that benefits all. I am a red king crab permit holder and life long resident of Kake AK all of my crewmen also live in Kake AK. We depend on fishing for our livelihood. IF proposal 242 goes threw what good is my permit?

is JUNEAU TERRITORIAL SPORTSMAN INC going to buy out all the Red King Crab permits in Southeast Alaska? Proposal 242 is not fair to the commercial fisherman!!!!

Paul Rostad-F/V Christina Dawn

Submitted by: Sandy Rostad
Community of Residence: Kake Alaska

Alaska Department of Fish and Game

Dear Sir's and Madam's,

My name is Sandy Rostad, I am the co-owner of the F/V Christina Dawn, my family and I operate several permits in the fishing industry of Southeast Alaska, one of them being Red King Crab. As you know very well there has not been a Red King Crab opening for several years and yet we are still paying the State of Alaska who financed a permit we are not able to use. Please consider the 58 permit holders that have staked their lives and savings accounts to do a fishery that not many can or will do.

We employ several people from villages and towns from Southeast Alaska, such as Angoon, Yakutat, and Kake for several fisheries. The impact of taking away the opportunity for a crew member to enhance their life with a little extra cashflow in a very weak economy and raising prices is detrimental to each and every family we try to support.

The proposal 242 that Juneau Territorial Sportsman has put forth is unrealistic as far as fairness is concerned, there is room for both Commercial and pleasure, the latter has enjoyed an abundance of crab for the last five or so years with what seems to be an increase in limits every year, correct me if I'm wrong. Does JTS do a good job? I believe they do their part in conservation for the sportsmen but please leave the commercial fishing industry to the Alaska Department of Fish and Game as they are working with SEAFA, PVOA, along with the processors and are equipped and paid to make the right decisions for all. We as a lifelong Kake, Alaska fishing family fully support proposal 243.

Respectfully

Sandy Rostad

F/V Christina Dawn

Submitted by: Eric Rosvold
Community of Residence: Petersburg

I am writing in opposition to Proposal 168, restriction of air space to pilots when there is an open fishing period. The authors are attempting to restrict airplanes from flying during a terminal area harvest. I believe the only entity who can restrict flight is the FAA. Even drone flight cannot be restricted if it follows basic flight rules. I think what may be able to be restricted is communication between airplanes and vessels that are participating in actual fishing activities. One would need to make sure that restriction did not carry over to fish tenders, or processors, during their ordinary course of business. TFR's are used to restrict airspace, but are done for reasons of safety, under which fishing must not fall.

PC423

Submitted by: Eric Rosvold
Community of Residence: Petersburg

I am writing in opposition to Proposal 167, if it is heard during the upcoming B of F meetings. This would allow use of a longer, 300 fathom, salmon seine, and addition of 50 fathoms to current regulation. If, all permits used the longer nets, it would be the equivalent of an additional 44 units of effort. Just a few years ago, we decided to buyback 100 permits, in order to remove gear from the water, and create economics that could work for the SE Seine Fleet. We, the fleet, still owe \$15,660,000 to NMFS for the funds borrowed. This proposal makes no economic sense to me.

PC424

Submitted by: Donna Russell
Community of Residence: Sitka

Prop 179- I support this proposal. I'm a grandmother and want my grandchildren to learn how to harvest fish eggs in a respectful way. Designating Promisual Bay is an excellent plan. Please continue to support of this as shown by the last Board of F and G meeting here with the overwhelming vote of positive support. Thank you for your time!

PC425

Submitted by: Kyle Ryan
Community of Residence: Klawock, Prince of Wales

Alaska Board of Fisheries,

I am a fishing guide at a lodge on Prince of Wales Island. I travel to Alaska during the short (June, July August) season to fill the staffing shortage experienced by the region during those months. In the ten years I have been doing this I have seen the season shorten (loss of the first two weeks in June) due to the tightening of regulations on non-resident sportfisherman. This has made seasonal employment in Alaska a less attractive option for myself and many other professionals that travel to Alaska to fill the labor demand.

Independent, seasonal captains such as myself have the flexibility to adjust their annual calendars as needed or shift away from Alaska completely. The small, family-owned, remote Alaskan businesses supported by the sport fishing industry do not have such flexibility; it is an all or nothing proposition for them. Up to half of their short season is required to cover the fixed annual costs associated with staying open. Tightening of regulations will lead to less demand combined with a shorter season/less time to earn an income after covering fixed costs. This makes the sensibility of staying in business questionable and jeopardizes the many local families and natives that depend on these small seasonal fishing operations to live in Alaska year-round. Many families are already on the edge and are being forced to leave their homes.

I spent several years with NOAA/NMFS as well as doing law enforcement for the Coast Guard. I understand the complexities of natural resource management. I believe in this case non-resident sportfishing is an easy target with little resistance and even less impact on the overall health of the fishery. Nothing more than a token gesture to the many critics in attempt to distract them. To really address the health of the fishery our leadership would need to take on such heavy issues such as commercial bycatch (trawling) and habitat degradation (dams, pollutants). These are items can be acted upon however there is little to no political appetite to take on the big industries supported by the destruction of our fishery. Until that happens, nothing will change. Crushing local family-owned business and the rural communities they support while claiming it will help the fishery is a misleading disservice to the public.

Thank you for your consideration.

Respectfully,

Kyle Ryan

Alaska Board of Fisheries,

I am a fishing guide at a lodge on Prince of Wales Island. I travel to Alaska during the short (June, July August) season to fill the staffing shortage experienced by the region during those months. In the ten years I have been doing this I have seen the season shorten (loss of the first two weeks in June) due to the tightening of regulations on non-resident sportfisherman. This has made seasonal employment in Alaska a less attractive option for myself and many other professionals that travel to Alaska to fill the labor demand.

Independent, seasonal captains such as myself have the flexibility to adjust their annual calendars as needed or shift away from Alaska completely. The small, family-owned, remote Alaskan businesses supported by the sport fishing industry do not have such flexibility; it is an all or nothing proposition for them. Up to half of their short season is required to cover the fixed annual costs associated with staying open. Tightening of regulations will lead to less demand combined with a shorter season/less time to earn an income after covering fixed costs. This makes the sensibility of staying in business questionable and jeopardizes the many local families and natives that depend on these small seasonal fishing operations to live in Alaska year-round. Many families are already on the edge and are being forced to leave their homes.

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Thank you for your consideration.

Respectfully,

Kyle Ryan

Submitted by: Anies Sadeghi

Community of Residence: Juneau, alaska

Anies sadeghi,

Proposal 242- I am in full support of prop 242. Resources should be allocated to community first, then local fisheries.

Prop 258,259- I do not support opening commercial dungeness crabbing in closed areas, allowing commercial fisheries will congest heavy traffic areas.

Proposal 164- I am in full support of prop 164, locals should have priority over non residents for Alaska resources.

Proposal 192- I am in support of proposal 192. Many locals have small boats, fishing black cod pots individually makes it difficult/dangerous in regard to overloading boats and managing lines/gear.

Proposal 138- I do not agree with this proposal. Alaskans rely on our wildlife resources to feed our families. The snag fisheries allow residents to harvest salmon to feed themselves and their families and is a very valuable resource for our communities. A better option would be to close snag fisheries for non residents.

Submitted by: Sterling Salisbury
Community of Residence: Juneau

I have lived in Alaska for 18 years, and the decline in sport fishermen's ability to fish for King Crab is not improving. At the same time, commercial fisheries—many of which do not reside in Juneau—are still able to fish for King Crab. Please consider the locals who live here and want to maintain a fishery for our friends and families. We urge you to stop commercial fishing for King Crab in area 11A.

Submitted by: Matthew Herod
Salmon Falls Resort

Community of Residence: Ketchikan

Hello,

As a full-time employee of Salmon Falls Fishing Resort located in Ketchikan, Alaska, I am writing to urge the Board of Fisheries to carefully consider the far-reaching impacts of the line items in the 2025 proposal. The long term success of our business, is dependent upon fair science-based regulations to maintain healthy & stable fisheries for years to come. With the same passion and respect that we have for the many others that depend on this sensitive ecosystem to support their own livelihoods, families and communities, I voice my support in the following items:

- 108, supporting the Proposal submitted by the South East Alaska Guides Organization (SEAGO)
- 113, the 75%/25% proposal by Jeff Wedekind

These items provide the best balance for maintaining healthy fisheries and the vibrant tourism business we depend on. The economic impact that our tourism business brings to the community is far reaching and not just fish related. We employ over 75 seasonal employees, and 6 employees "year round". Please consider the total impact that our tourism business brings to the local economy.

Conversely, proposals 116,117,119,120 would negatively impact our ability to operate the guided fishing portion of our resort's programming which is the foundation of our business model.

Thank you for your consideration.

Matt Herod

Area Managing Director

Salmon Falls Resort

9075704420

Submitted by: Mark Sams
Community of Residence: Juneau

Proposal No. 242. I support this proposal. The king crab opportunities outside of 11A for Juneau residents are very difficult to access due to the long boat rides and weather conditions. The Juneau area personal use has grown and should be fostered. The commercial opportunities are numerous with outside 11A with commercial operators able to more efficiently and safely access those opportunities. This proposal would provide for a more consistent fishery and healthy crab biomass. The one amendment I would recommend, is to limit the allotment

to 80% to continue to grow the biomass, since the biomass does appear to grow when the harvest is limited to 50% currently. This may also help other nearby biomass populations to grow as the 11A biomass grows and expands back to the day where king crab personal use limits were 6 crab a day.

Submitted by: Morgan Sanford
Community of Residence: Sitka, AK

My name is Morgan Sanford and I am a power troller out of Sitka with vessel Crystaleen.

-Prop 104, I oppose this proposal. This proposal is a confusingly worded document that only results in cuts to all gear quota except sport (charter) which receive an increase in quota as a result.

-Prop 108, I strongly oppose this proposal. This is a blatant violation of the Pacific Salmon Commission. Every gear type should be given full and complete opportunity to harvest their own quotas before relocations of any type.

-Prop 141, Amend to ONLY during catch and release fisheries.

-Prop 199, I oppose this proposal. Having areas delay and open independent of each other during the same fishing period would catastrophically concentrate effort of the fleet into areas where weather is nice and the seasons open, making it impossible for small boats to compete.

-Prop 202, I strongly oppose this proposal. It is currently illegal to use more than one Bar at a time and making it illegal to haul gear while fishing one Bar would be catastrophic to the fishery as it currently functions.

Proposal 169 has been submitted several times by different people in the past, so it seems obvious that it has been something that commercial fisherman think should be allowed. And it would simplify the regulations. In SE, there are still several hand troll permit holders that rely on income from this fishery to combat the ever-increasing cost of living in SE Alaska. Gas and diesel prices in small communities have hovered between \$5-7\$ a gallon, groceries have skyrocketed as well as fishing gear, all the while, fish prices have been stagnant and well behind inflation. By using downriggers with only **two rods**, it would give greater flexibility to hand troll vessels, vs using four fishing rods, or gurdies. Using downriggers would allow a troller to target certain depths easily, albeit still only using **two fishing lines**. Downriggers and rods with one line would also make it easier to see and release undersize kings quicker and more efficiently than gurdies. Using heavy weights and wire lines on gurdies makes it hard to tell when there are small fish on the line, not to mention the time it takes to reel in a 30lb lead while taking off 10-12 leaders, only to reach the small king salmon caught on the bottom spread. Using gurdies and fishing heavier weights while raising them by hand is not easy work and is always a potential safety issue. Dragging two wire lines with heavy weights with either davits or trolling poles on a small vessel on the ocean or a heavily tidal influenced area can be very exciting at times to say the least. I have personally had experience with snagging bottom and becoming attached to mother earth as well as having the trolling wire go into the trolling motor. Both examples were not safe and required swift action to avoid potential serious consequences. Also, in the expanding spring fisheries for king salmon in hatchery areas, downriggers would give a hand troller another tool when Kings frequent shallower areas that have a lot of seaweed and other debris that foul the conventional deep diver or leads used with the currently allowed 4 rod set up.

I have listened to past Board Of Fish meetings, and this proposal has largely been shot down by The Alaska Wildlife Troopers (AWT). AWT has commented that by allowing downriggers during the spring and summer troll fisheries it would be even harder to differentiate sport fishing vs commercial fishing. AWT also claims that they view this would only add to the problem of sport fish illegally entering the commercial market. I personally worked for the AWT for 30 years and was directly charged with enforcing the commercial fish and sport fish regulations in SE Alaska. I certainly do not share either concern and never have. This argument I believe is totally unsupported and should not be a factor in whether this regulation change remains unsupported by the BOF. AWT's job will **not** be made harder by this addition, especially when there are already regulations in place to prevent the sale of sport fish and vessel markings for commercial vessels. The Board should not penalize the legal fishers for the "possibility" of illegal activity. When you are hand trolling any time of year, you are already allowed to use up to **four fishing rods**, and simply adding a downrigger will not be some huge possibly illegal advantage. Commercial hand trollers are differentiated from sport fish vessels already as they must display commercial ADF&G numbers on their vessel as well as the metal ADF&G triangle, and the letters HT. And in areas that are closed to king salmon, if you are sport fishing from a troll vessel, you must immediately mark the fish by removing the dorsal fin.

By allowing downriggers, it is not going to change the fact that some people break the law and sell sport fish. We should not punish the majority of legal fisherman and make it more confusing by keeping an "only" time when downriggers can be used. In my time as an enforcement Trooper, (30 years in SE Alaska), and as a lifelong Alaskan sport and commercial fisherman, I never thought that by simply adding the use of downriggers for hand troll vessels year-round, that this would somehow become some sort of Enforcement problem or be some huge advantage that would make hand trollers unfairly productive.

Andy Savland, Hoonah

A proposal to address the intent, design and work of the ADFG/BOF Herring Revitalization Committee

In January 2024, proposal 57 to modify and modernize the Kodiak Herring fishery, was introduced to the BoF in Kodiak.

The provisions in Proposal 57 were supported by ADFG, but CFEC's opinion was in conflict with ADFG management, so the BOF took no action on the proposal.

A few months later the BOF formed the Herring Revitalization Committee (Committee)...**to bring all parties together, maximize the information available to the Committee (and therefore the BOF) about the herring fishery and it's markets, (both present and possible) and work towards resolving the conflict between ADFG and CFEC.**

Fishermen from Kodiak and SE Alaska, a market expert from ASMI, a herring processor, a subsistence rep, ADFG, CFEC and 2 members of the BOF made up the Committee. Two meetings were held that included public input as well as ADFG and ASMI reports. It seemed that all avenues of informative discussion were covered in these two meetings, leading industry to come to the place that was expected by the formation of the Committee....**to address the BOF as a whole with a proposal that rests firmly in the ADFG's authority to set seasons and manage the harvest in those seasons for the best sustainability, value and broad interests of the associated fishermen and processors and the world marketplace and to do it without waiting 3 years for the next "cycle".**

1). This proposal is supported by all but 1 of the Alaska herring fishermen relative to this proposal. The Department and the processing sector are onboard, as they too look for new opportunity with Alaska herring.

2). The last year has seen new, voluntary interest in Alaska Herring from around the world. Japan, Europe, East coast USA, and Iceland are all asking for/about Alaska herring, but are also needing a sustainability certification which is nearly nonexistent but for just a few other herring fisheries in the world.....**These interests represent a realistic sales volume of Alaska Herring that exceeds the volume of fish relative to this proposal.**

3). Alaska herring will be certified by Fall of 2025 with the Responsible Fisheries Management (RFM) certification scheme.

4). This proposal does not encroach on or otherwise function during the Kodiak "Food and Bait" fishery while they are fishing during their traditional harvest time and with their own official and separate quota. However, this proposal does seek to modify the "Food and Bait" season to match the fishery's actual activity timing of the last 5 years. (10/31 - 11/30 source: ADFG Kodiak)

5). This proposal makes available, the "stranded" quota and stranded investment of the traditional Kodiak herring fishermen and processors.

6). This proposal simply opens the door for the ability to look at new markets and new products that are otherwise not possible to address because of the lack of access to the raw herring product with the current and outdated management plan.

7). As management by ADFG and the Processors/buyers has evolved over the last 20 years, there is no concern for over harvest or for more harvesters out fishing than is needed by the buyers. **The fishermen simply cannot fish unless they first have a committed buyer for their harvest and the buyer's permission to go out**

After 2 meetings of the Committee and significant interaction with fishermen, processors, ADFG and world herring market buyers, we introduce this proposal as what we believe is the logical and intended end result of the Herring Revitalization Committee:

Therefore, we hope you will agree that this proposal can be accepted as a Board Generated Proposal that can be considered for passage at the March, 2025 meeting in Anchorage. Passage of this proposal will allow these stranded herring fishermen to harvest some of their traditional herring, for additional processing opportunity for plants and workers some late in the year opportunity and for those fish to enter the market in late 2025.

PROPOSAL

5 AAC 27.510. Fishing seasons and periods for Kodiak Area; 5 AAC 27.525. Seine specifications and operations for Kodiak Area and 5 AAC 27.535. Harvest strategies for Kodiak Area.

Modify herring purse seine gear, fishing seasons and periods, and herring sac roe harvest strategy to increase commercial herring harvest as follows:

5 AAC 27.510 (a) Unless otherwise provided for by emergency order, herring may be taken during the **herring** [sac roe] season from

1) **April 1 through January 31** [April 1 through June 30] as follows:

A). **“A” season - April 1 through October 25. “B” Season - Dec 1 through January 31**

2) Herring may be taken during the “Food and Bait” season from: **October 26 through November 30** [September 1 through February 28]

5 AAC 27.525 c) **From August 1 through January 31** [August 1 through February 28], a purse seine may not be more than 1,625 meshes in depth, including meshes used as chafing gear, or more than 150 fathoms in length.

5AAC 27.535 f) **“B” season shall begin December 1 with a GHL of 1,000 tons, unless the department assesses the combined Kodiak Herring Season GHL to be less than 2,500 tons, in which case, “A” and “B” season will be evenly split.**

g) **Any unharvested GHL from the A season shall be rolled into the “B” season, unless the department determines the available biomass assessed in the A season is not large enough to support an exploitation of at least 10%.**

Submitted by:

Bruce Schactler - Herring Revitalization Committee - Member (ASMI)-Kodiak resident
907-738-6451

Matt Alward - Committee participant, herring fisherman-Homer resident- 907-299-2933

Nathan Rose - Committee participant, herring fisherman-Kodiak resident- 907-654-4323

Submitted by: Mark Schaefer
Community of Residence: Craig

I am in opposition to proposals 116,117,119,120,140,141,104. There is no scientific reason for these proposals and this would cause most of the charter fleet to go out of business which in turn would have a detrimental economic effect on the communities we work in and the state of 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 Amy Schaub of Wrangell, Alaska. I am a commercial and sports fisherman. I stand against Proposal 156. As a commercial fisherman who lives in SE Alaska, who has fished hatcheries in common openings and as cost recovery efforts, hatcheries support fishermen, their crews, the communities, and many jobs. These past years when prices or volume of fish return have been challenging, being able to fish hatcheries has helped dramatically financially for my operation, my four crew, processors, and all that have been involved. By cutting hatcheries, there's a great potential for financial loss, loss of returning crew, and impacts on the communities of 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.

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,

Amy Schaub
Wrangell, Alaska



Submitted by: Jeff Schmidt

Community of Residence: Tacoma WA

I oppose prop 156 because it would drastically affect my troll season. Hatchery produced chums can account for nearly 75% of my overall profit some years. I also oppose prop 108 and 113 and support prop 109 and 110. I support an 80/20 split and inseason management for non residents. I also support a priority for residents in the sport allocation of 20%.

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 John Schmidt of Sitka, Alaska. I am a commercial fisherman. Hatchery chums are a huge part of our overall profit for the troll fishery. For our operation, hatchery-produced chums can account for nearly 75% of our overall profit for the fishing season. Hatchery chums have also taken pressure off other wild stocks such as king and coho salmon.

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. A 25% decrease will drastically impact not only the fisherman but the processing plants, tenders, and coastal communities as a whole.

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,

John Schmidt
Sitka, Alaska



Submitted by: John Schmidt

Community of Residence: Tacoma, Wa

I support prop 109 and 110 and oppose prop 108 and 113. I support a 80/20 split, inseason management for nonresidents and a resident priority for the sport allocation of 20%.

Submitted by: Pete Schneider
Community of Residence: Juneau

I'm writing in support of Proposal 242. As a resident interested in this seasonal personal use fishery, it has been extremely frustrating in past years watching the management "yo-yo" for years at a time as a result of commercial fishing impacts. The justification put forth by the Territorial Sportsman organization represents my concerns to achieve a productive, consistent fishery that provides a sustainable, yet conservative approach. I very much appreciate the opportunity to fish for king crab in the relatively safe waters found in 11A and 3-4 crab in a season is perfectly suitable for my household. I also appreciate the consideration for possibly combining efforts with friends to alleviate safety concerns and all the efficiencies that come with sharing trips.

Submitted by: Alec Schramek
Community of Residence: Petersburg

Dear chair and board members,

My name is Alec Schramek. I am a commercial troller living in Petersburg. Trolling is one of my two fisheries providing the majority of my income every season.

I strongly support proposal 110. This proposal prioritizes Alaska resident sport fishers, while also tuning the balance of commercial user groups in a fair manner for king salmon harvests. Non-resident fishermen and charter operators should share in conservation efforts during low abundance years.

PC440

Submitted by: Charles Schultz
Community of Residence: Juneau

Proposal 242

I support proposal 242 to limit 11A to sport fish crabbing only. Locals in skiffs and small boats have limited opportunity to fish elsewhere. We all should support the right of the local community to feed their families.

PC441

Submitted by: Charles Schultz
Dr. Charles Schultz DDS

Community of Residence: Juneau

I'm opposing 242 because the biomass does not support enough crab for more personal use .

PC442

Submitted by: Kristen Schultz
Community of Residence: Juneau

I am in support of closing 11A to commercial harvest of King Crab.

PC443

Submitted by: Andrew Scorzelli
Community of Residence: Sitka, Alaska

Dear Chair Carlson - Van Dort and Board Members,

My name is Andrew Scorzelli. I own the commercial fishing vessel Karmon Dee. I live in Sitka, Alaska which has been my home for 30 years. I am a commercial salmon troller and trolling is and has been almost 100% of my income for 30 years. 85% of troll fishery permit holders reside in SE Alaska and I am one of those residents.

The last two years , 2023 and 2024 have been financially difficult due to a significant drop in salmon prices. Adding to this hardship has been the taking away of the 2cnd summer king salmon troll fishery that traditionally happens in August. This has been happening because non resident sport harvesters have been allowed to catch more than their given quota. This is not fair and it is financially painful to me and my colleagues and their families . It is also painful for the businesses and towns who depend on the troll fleets production. Trolling , a hook and line very low by catch fishery is pretty much all I've done for a living for my entire adult life. Without chinook as part of the harvest I don't think I can make it economically. At 53 years old I don't relish the idea of selling my boat and going back to school to be retrained.

Therefore I am opposed to Proposal 105 which suggests non resident sport fishers must be treated equally to resident sport fishers.

106 and 107 I support as they address a loophole that would increase over harvest by non residents.

108 I oppose as it would do damage to long term resident harvesters.

109. Support in principle but prefer the RC drafted by ATA and TSI.

110. Support in principle but prefer the RC drafted by ATA and TSI.

111. Support in principle but prefer the RC drafted by ATA and TSI.

112. Support in principle but prefer the RC drafted by ATA and TSI.

113. Oppose. This would only do further damage to longterm resident stakeholders.

114. Oppose. The RC drafted by ATA and TSI is preferable.

115. Support. A simple method to eliminate over harvest by non residents.

116. Support.

117, Support.

118. Support.

119. Support. Another simple method to eliminate over harvest by non residents.

120. Support. Another simple method to eliminate over harvest by non residents.

121. Oppose. The current KSMP is flawed.

122. Support. Reduction of king mortality benefits all user groups.

123. Support. Reduction of king mortality benefits all user groups.

125. Support. All user groups should share the burden of rebuilding stocks of concern.

126. Support. All user groups should share the burden of rebuilding stocks of concern.

129. Support. Cannot hurt other user groups. Safer for fisherman.

130. Oppose strongly if a fair and equitable KSMP is adopted for all user groups.

131. Support. Equal share fisheries are less disruptive than one or two day king openers.

132. Support. Will lessen king mortality and eliminate ambiguity within the current law.

133. Support. Will lessen king mortality and eliminate ambiguity within the current law.

156. I strongly Oppose. Reducing hatchery production of chum salmon in SE Alaska would have huge negative impacts on trollers and other commercial fishermen.

173,174,175, 176,177, 178, 179 and 181 .Support! I support all proposals that seek to minimize the harvest of the Sitka Sound sac roe herring fishery . It is counter intuitive that we continue to allow the massive harvest of the fish that every other fish eats .

199. Support . Will be safer for fishermen and allow for a more equitable harvest.

202. Oppose. This proposal creates ambiguity about what a line is and what spare gear is.

Thank you all for your efforts and consideration and for reading these comments. It's very much appreciated.

Sincerely,

Andrew Scorzelli , F/V Karmon Dee

Derek & Sue Anderson – Owners & Operator of Screamin’ Reels Guide Service and Lodge –
Craig, Alaska

Dear Board of Fisheries,

We would like to provide our support for the following Proposals: 108,122,123, 131, 134,
159, 160, 161, 162, 163, 193, 206, 207, 208, 211

In particular, we would like to comment on our support of:

PROPOSAL 108 5 AAC 47.055 Southeast Alaska King Salmon Management Plan

As owners and operator of a Sport Fishing and Lodge Business in Craig, Alaska, the protection and ability to harvest King salmon is very important to our business. The 3 -2 -1 suggestion in proposal 108 allows my customers to retain King Salmon in June and early July. If the proposal is not adopted, and sport fishing faces frequent in season management, our business will suffer. Customers will not book trips in June and early July if they are not allowed to retain King Salmon. This could impact over 50% of our seasonal business revenues.

It is imperative that the sport fishing industry has a full season. Without a full season, we cannot retain our employees, nor can we generate enough revenue to sustain the cost of doing business. We cannot take any more cuts or reductions – otherwise we are not competitive to the lower 48 state fisheries. Customers will not travel all the way to Alaska if they cannot keep 3 salmon in June and 2 in early July. If we cannot have a solid King Salmon fishery in June, we will have to close our doors, as we will not be able to make a profit.

In season management brings instability as we saw in the past and makes business hard. People book and pay for a trip well in advance of making the actual trip to Alaska from the lower 48 states. If they arrive and the season is closed, this will be bad for our business, and they will not return in future years. Proposal 108 brings consistency for our customers; they know what they can fish for and retain.

Not only does King fishing impact our business, but it impacts the local economy as well. We support the local economy via our purchases and tax revenue. We shop at the local grocery/liquor stores and gift shops in town for our lodge needs and take our customers to these same locations when they arrive on the island.

Our customers fly with Island Air Express - the main airline serving our island. Last year alone, our lodge customers paid Island Air Express over \$200,000 in gross revenue. We rely on The Bay Company in Craig to maintain our boats, from oil changes to full winterization and everything in between. We purchased \$50,000 of new motors from The Bay Company in 2024.

Our lodge was built by carpenters, electricians, and plumbers from our local community.

We try to hire employees from the island, and we pay living wages. We donate to the local Craig High School sports teams and graduating classes. Last year, we provided a scholarship for one of our employees to attend college in Washington, including her room and board.

As you can see from the above, the impact of the King Salmon season reaches far and deep into our local community and has a large impact on taxable revenue.

We are in opposition of Proposals: 104,106,107, 109, 110, 111, 114, 115, 116, 117, 118, 119, 120, 125, 126, 127, 128, 130, 140, 141, 164, 203, 205, 209, 210

Thank you for taking your time to review our comments. We appreciate your efforts on these very important proposals.

Sincerely,

Derek & Sue Anderson

www.screaminreels.com

Submitted by: James Bergman
Screamin Reels lodge

Community of Residence: Thorne Bay

Hi my name is James Jeffrey Bergman. I have been a guide in Alaska for 25 plus years and a full time resident on Prince of wales Island since 2020. I have been running a charter boat for Screamin Reels lodge out of Craig for the past 4 years. It is my main source of income that allows my wife and I to live in such an amazing place! I want to show my strong support for .

Proposal 108 ACC 47.055 Southeast Alaska King Salmon Management Plan.

It is critical to my livelihood to have the 3-2-1 management plan. Or we will have a hard time staying in business. June is a huge month for us and not having other Salmon options that time of year we will have no chance to fill the boats and make a living. I Truly appreciate you taking the time to read my comments!!

Thank you!!

James (Jeff) Bergman

Submitted by: Chelsea Keutmann
Sea to Shore Seafood Co.

Community of Residence: Petersburg

I am here to oppose COMMERCIAL SALMON (6 proposals)

PROPOSAL 165

5 AAC 33.310. Fishing seasons and periods. for moving the start day to Monday vs Sunday. This will have a negative impact on fresh salmon being sent into fresh markets. It is already a struggle to get our fresh salmon into markets before the weekend via Alaska Airlines schedules, but this would make it impossible to fulfil these markets without having to miss fishing time. This is not just a personal issue; this would negatively affect all fresh markets big and small.



507 Katlian St. Sitka, Alaska 99835
907-747-5811

Madam Chair Carlson - Van Dort and members of the Alaska State Board of Fisheries:

Seafood Producers Cooperative (SPC) is an 80-year-old member-fishermen owned company that processes and markets on average 6-8 million pounds annually, seafood products both domestically and internationally, produced by our members. SPC was founded in 1944. SPC has had a plant located in Sitka, Alaska since its completion in 1980. SPC currently has 353 members of which 210 are Alaska residents and 206 hold Alaska troll permits. SPC has a workforce averaging around 100 during peak production in the summer months. Many of these workers are residents of Sitka. SPC is one of Sitka's largest private sector employers. SPC's core products are troll caught king, coho and chum salmon, as well as halibut and sablefish that are caught in the longline fisheries. King salmon is an essential part of SPC's business model and has been for many decades. SPC requires stability in the management of the king salmon fisheries, especially the summer fishery. This has not been the case for the past two years. The comments by SPC will focus on proposals that will impact the future management of the king salmon troll fishery, and hence the viability of the fleet that catches king salmon and delivers to SPC, as well as the general health of SPC and its members with respect to having access to one of its most marketable and highest value products, king salmon. The comments will address some other proposals as well.

It is important to review some history of the Southeast Alaska King Salmon Management Plan (KSMP) that has been in place for several decades and the history of the troll fleet and Pacific Salmon Treaty (PST). Power troll permits went to limited entry in 1973, and hand troll permits in 1982. Since then, the troll fleet has declined in number as the nontransferable permits have sunset with the retirement or death of the permit holders. The Troll fleet in SEAK is still the second largest commercial fleet in Alaska and 85% of the permits are held by residents.

In 1985 the Pacific Salmon Treaty (PST) was implemented. At this time Alaska started to harvest king salmon on a fixed quota. The number was not initially based on abundance and tended to be static at 263,000 fish.

The King Salmon Management Plan (KSMP) was initiated in 1992 by the Board of Fish (BOF). It acknowledged that all the user groups have a role to play in sharing the king salmon resource.

Also in 1992, a task force of trollers was established to iron out internal allocation issues within the troll fleet regarding the different seasons, winter, spring and summer. The winter was limited to a 45,000-treaty fish quota (non-AK hatchery fish). The summer was divided into two openers, 70% of the kings to be harvested in July and 30% to be harvested in August. This was put into regulation in 1994.

The 80% troll, 20% sport allocation was in place by 1996.

The PST went to abundance-based management in 1998. The State of Alaska has had to take cuts in subsequent PST renegotiations since 1998, i.e. 2008 and 2018. These cuts in harvest have taken place with stake holder representation of all user groups, including troll and sport. In particular, the guided and unguided sector that caters to the nonresident recreational harvest has had a seat on the Northern Panel of the PST. They have been well informed of these cuts and thus should understand their sector must adjust to the reduced harvest rates.

In 2018 the PST negotiations resulted in a hard cap for AK with respect to king salmon overages. Thus, there can no longer be reckless management of any sector when it comes to harvest limits. Also, the ranges of harvest were significantly reduced so that even if there are "high" abundance years of king salmon, AK will not be able to enjoy a significantly higher harvest rate as it did prior to 2018. Thus, the myth of "paying back" overages by the sport sector in a high abundance year is not a realistic expectation anymore. This fact was made most apparent in 2024, when the PST changed the model early in the year to exclude Catch Per Unit Effort (CPUE) in the winter troll fishery, in District 13, during the months of October and November to influence the Abundance Index (AI). Had that aspect of abundance prediction been in place in 2024, as it had in 2019-2022, SEAK would have had a larger harvest.

Again, the reduction in Alaska harvest rates have been induced by changes in the PST, which occurred in 1998, 2008 and 2018 (most significantly in 2008, 2018). These PST renegotiations have all required Alaska to take harvest cuts and all user groups, including the guided and unguided recreational groups, have agreed to this.

Finally, there is the issue of the agreement that was signed in 2022 at the March BOF meeting. The agreement was signed by Alaska Trollers Association (ATA), Territorial Sportsman Incorporated (TSI), and Southeast Alaska Guides Organization (SEAGO). This agreement specifically stated that the sport and troll sectors would be managed to their specific allocation levels. (A copy of RC 178, the signed document, is included in the Appendix.)

Sometime after March 2023, the wording of the agreement was changed without the knowledge or consent of at least two of the signers, ATA and TSI. The words "sport fishery" were removed from **5 AAC 47.055. Southeast Alaska King Salmon Management Plan,**

paragraph b, part 2, resulting in a serious loss to the troll fishery in 2023, about 17,000 kings. This was brought to the attention of the BOF in the fall of 2023. At the November 2023 BOF meeting in Homer, the BOF decided to leave the modified language in the 2022 signed agreement. In 2024, the altered language was retained, not only causing the troll fishery to lose its August opener, but this time also forcing the sport fishery to close in August due to high rates of harvest by nonresident sport fishermen earlier in the summer. This change of language has created an untenable situation for resident Alaskans, both sport fishermen and trollers.

SPC will be supporting a KSMP modification that has been initially authored by TSI and ATA. The KSMP modifications will be submitted to the BOF as an RC when the meeting begins in January. This will be referred to as the RC in these comments. The proposed RC document was presented to the SPC Board of Directors in December at a scheduled meeting. The Board voted unanimously to endorse the proposed RC. The RC document that SPC refers to is included in the Appendix of these comments.

The KSMP modification draws from 5 of the submitted proposals (Proposals 109, 110, 111, 114 and 117). SPC will not be addressing all of these proposals because we support the modifications that the RC suggests and the part of these proposals that are incorporated into the RC's proposed KSMP revisions. SPC appreciates the work of the authors of these proposals and understands that we all want stability for resident fishermen, sport and commercial.

SPC supports continuing the signed agreement from the Jan 2022 BOF meeting. SPC supports continuing the 80/20 split while maintaining the KSMP that has been in place since the mid-1990s. SPC desires to continue with two summer king openers that conform to the management process that has existed since the Southeast Alaska KSMP was fully established in 1994.

The troll king markets are in as much need of stability as nonresident recreational harvest markets. SPC, the troll fleet and the processors that purchase the fish all have markets with expectations of consistency beyond the needs of the section of the recreational fishery that caters to the nonresident harvesters. The troll fishery is managed to strict limitations.

SPC depends on a stable troll king fishery.

Troll caught king salmon is a high margin product for SPC and has played an essential role in our ability to remain viable and profitable for decades. It has been especially important in recent years. SPC is one of the SEAK fish processing and marketing businesses that has remained independent and stable throughout the recent trend of mergers and closures in the industry. Troll caught king salmon plays a leading role in driving SPC's and its member's earnings and contributes heavily to the continued health and vitality of SEAK communities. SPC wishes to maintain this.

SPC does not support proposals that use "averaging" at the current time. Averages that extend to earlier than 2018 involve different PST management scenarios. There will be another PST

negotiation set in place in 2028. The most recent PST changes, initiated for 2024, indicate that there will be no more "high abundance" years where there would be payback potential for the overage in the recreational sector, which is driven by increasing numbers of non-resident harvest.

The following comments pertain to proposals related to the KSMP.

SPC is opposed to Proposal 104, which establishes an ocean subsistence king salmon fishery that creates a new allocation of a minimum of 5000 fish or 5% of the total SEAK king quota. The king salmon fishery is already fully allocated and stressed because one of the harvest sectors, nonresident sport, is increasing its harvest significantly. SPC would rather the sport fish fishery be managed to its harvest ceiling by cuts in the early season nonresident king harvest so that residents have more opportunity.

SPC is opposed to Proposal 105, which claims that nonresidents must be treated equally to the resident harvesters in the sport fish fishery when fishing in the Exclusive Economic Zone (EEZ - outside 3 miles). This claim is based on the Magnuson Stevens Act (MSA), a body of law that is the purview of the National Marine Fisheries Service (NMFS) and the North Pacific Fisheries Management Council (NPFMC). The KSMP has been in place for over 30 years and there is a strong precedent for continuing to differentiate between resident and nonresident harvesters. NMFS and the NPFMC have shown no interest in establishing parity between residents and nonresidents for king salmon in the EEZ since the KSMP was established. If Proposal 105 were to pass there would be a significant shift in harvest effort to the EEZ, further exacerbating the current problems with the KSMP. One of the Alaska Department of Fish and Game's (ADFG) stated concerns with other proposals, such as 104 and 130, is that shaping of the SEAK king salmon harvest by shifting harvest efforts by area or time can create issues at the PST. Although, harvest shaping concerns at the PST are probably a low level of concern since that has already been allowed to happen with the increased nonresident harvest in May and June, the implementation of 105 will certainly shift harvest effort to the EEZ since there is a profit motive to do so. Finally, there is no proposed enforcement or monitoring method for fishing different bag and harvest limits in the EEZ versus inside 3 miles. If passed, this proposal will be highly allocative. It will result in less fish for trollers and resident sport fishermen.

SPC supports Proposals 106 and 107. If Proposal 105 were to pass, then the only way to keep the KSMP intact is to make it illegal for nonresidents to possess more than their legal limit in State waters even if they caught them in the EEZ. The ADFG concern that they would not be able to count the fish if they were landed in the lower 48 would become inconsequential because the effort in the EEZ would remain minimal if the fish could not be landed nor processed in AK.

SPC opposes Proposal 108 which would effectively change the KSMP's 29-year precedent of having an allocation partition of 80% troll, 20% sport. As stated earlier, king salmon is as important to SPC, its member-owners and employees in making the company profitable as it is for the sector of the sport industry that is growing its markets for nonresident sport fishermen.

The growth in the nonresident sport fish industry comes at the expense of residents, both trollers and sport fishermen.

SPC also opposes Proposal 113 for the same reasons it opposes Proposal 108.

SPC supports Proposal 110, which returns to the signed agreement at the March 2022 BOF meeting. The words manage to the "sport fishery" harvest ceiling are returned to regulation.

SPC supports Proposals 115, 116, 117 as they reduce nonresident bag limits and annual harvest limits, especially early in the year. SPC realizes that the proposed KSMP modifications that TSI and ATA are submitting will achieve this. These proposals are part of what the larger modification package is working to achieve.

SPC opposes Proposal 121. Proposal 121 is the status quo for the KSMP, which is untenable for SPC as it is for all trollers and resident sport fishermen. It is effectively a reallocation to nonresident sport harvesters and the businesses that cater to them at the expense of SEAK residents.

SPC supports Proposals 125 and 126. These proposals close sport fishing in District 14 A to protect listed Stocks of Concern (SOC). The closure occurs during the time of year when the Taku and Chilkat king salmon are migrating through (April to mid-June). Trolling has been closed in this area during the spring since 2018. These proposals would further protect the SOC and facilitate their rebuild at a more rapid pace.

SPC supports Proposal 129. Proposal 129 allows for an extra day of fishing in the spring troll king fishery in Yakutat. The proposal does not change the cap of 1000 fish. The proposal will allow for more opportunity for the Yakutat troll fleet, many of whom are skiff fishermen, to work around weather concerns.

SPC supports Proposal 130 in sentiment. That said, it has already been stated that SPC supports the KSMP that has been in place for 3 decades and wants 2 king salmon openers in the summer fishery, 70% of the harvest in July and 30% in August. The sentiment for support for 130 is based on SPC's desire to see the troll fleet harvest their part of the quota. SPC would rather see no action on this proposal and a return to the traditional management scenario that was the KSMP in place prior to 2023.

SPC supports Proposal 131. Proposal 131 allows for a noncompetitive king harvest in Aug. if it is determined that the opener will be less than 3 days. This adds an extra option to the management toolbox which currently only allows for such management in September. It would also eliminate the need for a closure prior to a 1- or 2-day opener, which is very inconvenient for both the troll fleet and the processors as the fleet must be turned around rapidly.

This concludes the section of discussion on the KSMP proposals. There are two more proposals that SPC will discuss.

SPC opposes Proposal 158. Proposal 158 would limit the egg take of pink and chum eggs at the SEAK hatcheries by 25%. This would effectively cut hatchery production of pink and chum salmon. There is very little hatchery pink production in SEAK. That aspect of 158 is superfluous. Chums are an essential part of hatchery production that is vitally important to the entire fishing fleet. SPC stands behind the SEAK hatchery organizations in opposition to this proposal.

SPC opposes Proposal 202 as written. Proposal 202 prohibits vessels fishing in the dinglebar fishery (directed ling cod) from having spare gear assembled on board the boat. It uses a convoluted definition of line (a piece of assembled gear or train) on board the boat as opposed to in the water. Every vessel carries spare gear. A line is gear that is in the water, not on the boat. This proposal would be supported if it was rewritten to say that there can't be more than one train in the water at a time. Fishermen should be allowed to have a spare train on deck or in the wheelhouse in case they lose their gear, so they don't have to run to town or spend hours rebuilding gear.

This concludes SPC's comments to the BOF. In summary, our primary concern is that the KSMP is restored to the format that existed prior to 2023 and is specified by the RC proposed by ATA and TSI. SPC wants to maintain the historic 80% troll, 20% sport split. SPC supports two troll openers in the summer that split 70% for July, and 30% for August. SPC stands behind the modifications to the KSMP that are being submitted by ATA and TSI RC.

Thank you for your committed efforts and consideration. Thank you for reading these comments.

Sincerely:

Richie Davis - Chairman of the Board, Seafood Producers Cooperative

Norm Pillen – President, Seafood Producers Cooperative

Carter Hughes – Author-Member, Seafood Producers Cooperative

SEAK Fishing LLC

Conner Cooke
Owner/Operator

708 Sirstad ST.
Sitka, AK 99835
Connercooke@hotmail.com

Board of Fish

Ketchikan, AK

01/14/2025

Dear Board of Fish,

I am writing you to show support for SEAGO's proposal for King Salmon. The proposal will allow the charter industry to remain healthy. Without this management plan, there simply would not be enough fish during low abundance years. Making it extremely difficult to keep clientele. Without clients, our industry will fail.

The other proposals I would like to support are the reopening of yelloweye for residents, and the reduced reopening of DSR for non-residents.

Final thoughts: With SEAGO's proposal, it will help keep our industry alive. As an Alaskan resident, it is important to keep my industry going. My family relies on charter fishing as a main source of income to live here in Sitka. However, the same can be said about the commercial fleet. It is important to understand that this proposal is a good compromise for everyone to continue fishing.

Respectfully,

Conner Cooke

replace with
LOGO



Seawind Aviation, Inc.

1809 Tongass Avenue • Ketchikan, Alaska 99901
 (907) 225-1206
 info@seawindaviation.com

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

January 14, 2025
Sent by email.

Dear Members of the Alaska Board of Fisheries,

As the owner/operators of Seawind Aviation, in Ketchikan, Alaska, we first want to thank you for the opportunity to submit our comments and concerns about the potential revisions to the three-year king salmon management plan.

Seawind is owned by my husband, Steve Kamm (3rd generation Alaskan) and myself who moved to Ketchikan in 1997. We operate 4 floatplanes (2 turbine Otters and 2 beavers) and we employ 14 employees, 12 of which are Alaskan. Steve began flying 35 years ago in Ketchikan, and we began Seawind together in 2003. Although we do not specifically operate a guide/charter business, approximately 60% of our revenue is generated from transporting guests to multiple fishing lodges throughout southern Southeast Alaska. While we certainly understand the need for management of both a vital economic resource and source of personal enjoyment, we believe that many of the proposals present an inflexible reaction that will result in economic loss, both direct and collateral, in times of diminished and abundant supply.

In short, as a collateral, indirect stakeholder, we join and support others in their positions on the following proposals:

Support – 108, 122, 123, 131, 134, 159-163, 193, 206-208, 211

Oppose – 104, 106, 107, 109-111, 114-120, 125-130, 140, 141, 164, 203, 205, 209, 210

We support SEAGO's proposal 108 that adds a sport harvest cap not exceed 25% of the troll/sport allocation on any given year. The proposal also adds a 9-year rolling average that triggers reduced limits if sport exceeds a 22% average for two consecutive years to bring allocation back into alignment.

We agree that viewing random years of overages (arguably because of a more abundant run) in the context of years of shortfall, allows the historical flexibility the sport sector has always needed to have reasonable fishing opportunity in low abundance. As the data shows, the rolling average, extended over time, appears to meet the intent of distribution percentile. It

**Seawind Aviation, Inc.**

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also makes economic sense for seasonal, resource-related businesses to be able to *hope* to make up for a “down” year, with the inherent anticipation of an “up” next year.

As other stakeholders have provided statistics in support of proposal 108, we will not restate them here (notwithstanding our concurrence). We will, however, re-iterate the collateral economic harm that trickles down to businesses such as ours that rely on providing

transportation services to fishing lodge guests. Suggested lower king salmon limits to start off the season (prior to the strong, late summer silver salmon runs) specifically a one fish limit before July, would seriously impact state and local revenue as nonresident fishing guests will be reluctant to justify the cost of a long-anticipate first, or return, trip to Alaska, just to retain a single king salmon and try for a silver run that has yet to materialize. In short, many of Alaska’s fishing-tourists will simply be compelled to make other plans and seek other recreational locations and/or activities.

Over many years in this business, we have observed that it is very common for fishing lodge clients to return annually. However, once these customers are lost due to finding other recreational locations and activities, it appears to be difficult for the fishing lodges we support to entice their return. In effect, we believe that reducing non-resident annual limits below the already low, but manageable, current level would significantly reduce early-season fishing lodge clientele and, collaterally, reduce revenue to support businesses such as ours.

Balancing the economic interests of direct and collateral stakeholders, including the State of Alaska, is no enviable task. Thank you for your time in considering our position, as a collateral, support-industry stakeholder.

Respectfully submitted,

Lesley Kamm
Seawind Aviation, Inc.
1249 Tongass Avenue
Ketchikan, Alaska 99901

Submitted by: Tessa Schmidt
Selkie Snorkels LLC

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.

Submitted by: Aaron Severson
Community of Residence: Petersburg

I oppose 156, reducing the output 25% won't put a dent in the cumulative biomass feeding in the high seas but it will hurt Alaskan fisherman at a time when we can't afford more pain.

1/6/2025

ALASKA BOARD OF FISHERIES

RE: SEAK PROPOSALS RED KING CRAB

Proposal 242 - OPPOSE

Proposal 243 - SUPPORT

My name is Mark Severson, and I have been a skipper fishing King Crab in Southeast Alaska since 1979, and crewing before that. I have witnessed the crab cycles for decades and have been trying to share my observations with management since 2004 and before.

I have not agreed with the way they do their survey to calculate the crab population as a whole. We took the biologists out for an extra fall survey in 2004. They said if our survey showed them more crab than their August survey they would open a season that year. They set their pots on starfish habitat and I set pots where I know the red crab live. The difference of how they set pots compared to a fishermen setting pots should have been embarrassing to them. In Pybus Bay we caught 168 legal males in 20 pots, they caught 41 legal males in 40 pots. The difference was even greater in Gambier Bay and Holkam Bay. We caught 483 legal males total to their 51 legal males.

The other thing that irritated me was the few crab they caught were thoroughly examined and our substantial amount of crab caught, they merely counted the males and just threw them overboard without data collected. They had no real interest in getting valuable information for their survey. We completed the survey early and they allowed me to set all 30 pots in the area I chose. I set in open water out in the straits where I had seen reds mixed with browns before. With only an eight to twelve hour soak we had over an eight red crab average. Once again the only thing they measured was the keepers and everything else went overboard unexamined. The only interest expressed by the head biologist was "Wow, do you know other places like that?" Needless to say we did not get a season that year with the reason being we did not look at the crab population as a whole! If they had asked me to show them where the females and undersized lived I would have showed them the heads of the bay where they live most of the time. We were targeting legal males for their survey threshold calculations.

There are red king crab in other bays and in the straits that never get fished on because management has not met "their" threshold to open a commercial fishery. Their knowledge of the red king crab population is very limited. The reason I know this is I have set brown king crab pots from Skagway to Cape Omni and came across lots of red king crab. They migrate and are not in the same spots every time. I know for a fact there are much more red king crab in Southeast Alaska than the Department is aware of.

We have to buy our permit every year in the chance we get a season. With only 3 seasons in the past twenty years it has inflated the permit value. Our community has suffered from the loss of revenue that could have been generated. The only people that have made money off red king crab for years are the

employees who get paid extra time for their summer playtime, just a sight seeing excursion in Southeast Alaska.

I strongly OPPOSE 242 as it is an insult to anyone with a red crab commercial permit. It has been a commercial fishery for well over 70 years. The limited commercial openings we are allowed is nothing compared to the personal use fishery effort. Not to mention the non reported personal use. I believe the pounds caught by personal use is way more than the pounds caught in 11-A by the commercial fishery that occurs every seven years, if we're lucky.

If the decision is to give our fishery in 11-A to the sport fishermen than they should stop wasting money conducting their survey. If we don't fish, they don't "play."

I SUPPORT 243 as a proposed equal split fishery. As much as I'm opposed to an equal split fishery that doesn't take into account a fishermen's skill level, if that's the only way to a get a red crab fishery again, I am for it.

Sincerely,

Mark Severson

Petersburg, AK

Submitted by: Mark Severson
Community of Residence: Petersburg

Amend & Support 236 - allow pots to be stored in waters up to 20 fathoms.

Amend & Support 240 - baited KC pots allowed while unloading Tanner crab and unregistering for Tanner fishing.

Oppose 242 - personal use already gets the larger portion of allocation. A large portion of 11-A is already closed to commercial fishing.

Amend & Support 247 - allow Tanner crab pots to be stored prior to fishery up to 20 fathoms.

Support 197 - request consideration to be given to develop a threshold that when stocks are high the bag limit be relaxed, but when stock level declines, which it will, that the bag limit return to 4 sablefish per day.

Submitted by: Mark Severson
Community of Residence: Petersburg

Proposal 242. - OPPOSE

Proposal 243. - SUPPORT

Proposal 156. - OPPOSE

Submitted by: David Creighton
Shelter Cove Lodge

Community of Residence: Craig

To the members of the Board of Fish and Game.

My name is David Creighton. I have operated Shelter Cove Lodge in Craig alongside my family for 26 years. Shelter Cove's operations are now assisted by a 3rd generation that hopes to be involved for years to come.

This letter is intended to provide information and assist in your decision making to the benefit of Alaska's resource management. The intent is for this comment to encompass all king salmon proposals.

The Sport Fishing Services Industry incorporates much more than just fishing charters. All non-resident sport fishing that takes place in SEAK involves one service or another. Sporting goods stores, boat/outboard shops, fuel providers, air carriers, food services, and rental cars are a part of this industry many Charter fleet business models would not survive without. These businesses serve our resident public year round as well however perhaps not near as well or economically without the monetary influx provided by our non-resident fishermen.

Over the last 40 years the Sport Fishing Service Industry has grown from its infancy in the 1980s to a thriving economic driver to SE Alaska communities. Furthermore, it has become an economic staple to the small rural communities such as Craig as the primary tourism attraction. Tourism has gained enough economic recognition that the residents of Craig just voted to increase the sales tax from 5% to 7% only during months that incorporate tourism. The sales tax generated by my gross revenue alone accounts for approximately 12% of the City of Craig's 3rd quarter sales tax income; it's largest quarter. This does not include the sales tax generated on the money my organization spends at the fuel dock, boat shop, air carriers, and other suppliers. To say our impact is large is an understatement.

As I go through the various king salmon proposals, I notice a common theme. Proposals presented by the sports fishing service industry attempt to work with the troll fleet to find a common ground or an agreement that can work for both. In times of higher abundance, many of these proposals work out to be in the favor of troll over time in fish numbers. Most of the proposals presented by the troll fleet present ideas that will prevent a 20% harvest in a medium to high abundance leading to what equates to an allocation shift toward troll.

I have had the opportunity to speak to many members of all gear groups. It is widely agreed that harvest opportunities for the residents of Alaska should be a priority. I believe most residents prefer the healthier option of local protein as well as the family values and memories created in the harvest.

To me, it is a shame the current agreement is being forced to sunset. It provides the stability we need to still be marketable in the world wide tourism industry yet the bare minimum impact on the Alaska king salmon fishery. In science, it is not common for an average derived from only 3 data points to accurately represent what is actually occurring in a system. I believe Prop. 108 is an attempt to alleviate this issue with a 9 year rolling average. To point out again, some concessions are given with protective

mechanisms for troll in what seems to be an effort to work with them instead of against them. However, Prop. 108 is not a complete solution to the problem. 2 consecutive years greater than 22.5% basically just occurred which would again leave sport with with an allocation deficit with these payback provisions.

A hard cap of 20% in years of low abundance is just not enough allocation to sustain the Sport Fishing Service Industry. An annual limit less than 3 fish in the month of June will render it unmarketable. Our clients will go somewhere else. In the past we had other species to target. Now, cumulative retention reduction of every species has left June operating on the absolute bare minimum. If 1/3 of the season is lost, many small operations won't make it and associated business will suffer.

I encourage the board to consider the king salmon fishery as a business. If you personally owned the business that had a limited resource of 100 units, would you sell your product at \$10/unit or \$100/unit? In my humble opinion, the lion's share of the State's limited king salmon resource is not currently being harvested and sold to gain the greatest economic benefit.

We, as a family owned and operated business and major contributor to our community, appreciate your time and consideration.

Sincerely,

David Creighton

Shelter Cove Lodge

PC454

Submitted by: Matthew Short

Community of Residence: Petersburg

I am in support of proposal 243 and opposed to proposal 242. I have owned a red king crab permit since 2013 and have only been able to use the permit once in that time. With the low fish prices abundant in the industry right now, being able to harvest a small share of high value king crab yearly would be greatly beneficial to myself, my family, and my crew. I find it unacceptable that sport fishermen from Juneau are trying to put us out of business. With the current financial state of the fishing industry, we need more fishing opportunities, not less. Every year there is a harvestable surplus available that we permit holders rarely get to touch. With an annual individual catch limit and a 3 month long season, we could keep our expenses lower and market our crab to really maximize the value of the product. Thank you for your time.

Submitted by: Rebecca Siegel

Community of Residence: Fairbanks

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.



January 13, 2025

Ms. Märit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Silver Bay Seafoods Comments on Proposal 156

Dear Chair Carlson-Van Dort and Board of Fisheries Members:

Silver Bay Seafoods is a fishermen-owned seafood processing company with facilities throughout Alaska. Silver Bay's operations, fishermen and community partners in Southeast, Prince William Sound, and Kodiak depend on the fishery enhancement programs. **We strongly oppose proposal 156.**

Hatchery production is managed through a rigorous public permitting process which involves many stakeholders and Alaska Department of Fish and Game (ADF&G) experts from multiple disciplines. ADF&G opposes proposal 156 on the grounds that "the changes to Alaska hatchery salmon production envisioned by this proposal are likely to have little effect on marine competition among salmon species."

Significant investments have been made in Alaska's salmon hatchery program and associated research to provide for sustainable salmon harvests and to bolster the economies of coastal communities while maintaining a wild stock priority. In particular, the work of the Alaska Hatchery Research Project provides information to show how these enhanced stocks interact with wild salmon. The team of scientists collaborating on this project are well respected and have broad experience in salmon enhancement, management, and wild and hatchery interactions.

Recently, there has been literature (Global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids; McMillan et al) published with assertions about the relationship between hatcheries and wild salmon, citing scientific reports to support these assertions. ADF&G reviewed this literature and the cited scientific papers with an eye towards Alaska's hatchery programs and research and reported their findings to the Alaska House Fisheries Committee on February 6, 2024. The ADF&G presentation concluded that this report may be useful outside of Alaska, but it is less useful for Alaska. The recording of Alaska Hatchery Update report can be found at <https://www.akleg.gov/basis/Meeting/Detail?Meeting=HFSH%202024-02-06%2010:00:00#> and

a link to the presentation can be found here:

https://www.akleg.gov/basis/get_documents.asp?session=33&docid=28426

We support Alaska's outstanding hatchery program, which is rooted in strong scientific methodology and precautionary principles and sustainable fisheries policies to protect wild salmon populations. This program has demonstrated over 50 years of sustainable enhanced production to supplement and/or enhance our wild stocks, providing economic opportunity and food security to all user groups. A McDowell Group report ([Alaska+Hatchery+Impacts,+Executive+Summary.pdf](#)) identifies the economic contribution in 2018 of Alaska's salmon hatcheries to be 4,700 jobs, \$218 million in labor income, and \$600 million in total economic output. Additionally, ADF&G staff comments included the average direct economic benefits from the Southeast pink and chum hatchery harvest including cost recovery to be \$1.2 million for pink salmon and \$52 million for chum in exvessel value.

The entire Alaska seafood industry has suffered from a perfect storm of economic circumstances the last 2 years. Many coastal communities in Alaska depend on Alaska seafood for food security and for an economic foundation that sustains their economies. Often, the health of the Alaska seafood industry and the health of these communities are interdependent. The extent of these economic conditions are well detailed in the NOAA Alaska Seafood Snapshot published August 2024 and summarized in the executive summary found at <https://www.fisheries.noaa.gov/s3//2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf> . The report cites a total direct loss of \$1.8 billion for harvesters and processors, and \$269 million in lost state and local tax revenue. While the seafood industry and communities try to recover from this, we ask Alaska's fisheries policy leaders to consider the strong need for stability and sound, science-based decision-making.

In closing, **we ask you to reject proposal 156** and continue to support the existing public RPT process and the Commissioner's strict oversight of the hatchery program. We ask you to work with ADF&G to further your understanding of Alaska-relevant science and listen to the hatchery community as we stress the importance of the Alaska salmon hatchery program to Alaskans and businesses. Finally, we ask that you prioritize stability and sound, science-based decision-making as you consider what a reduction in sustainable hatchery fishing opportunity may do to the many stakeholders that rely on this for food security and income, especially now.

Respectfully,



Abby Fredrick
VP of External Affairs

Submitted by: Jay Simerka

Community of Residence: Port Townsend, wa

156 unclear objective with substantial economic impact

SITKA ECONOMIC DEVELOPMENT ASSOCIATION**RESOLUTION NO. 25-1****A RESOLUTION OF THE SITKA ECONOMIC DEVELOPMENT ASSOCIATION OF THE CITY OF SITKA, ALASKA, OPPOSING PROPOSAL 156 TO BE CONSIDERED AT THE JANUARY 28 - FEBRUARY 9, 2025, ALASKA BOARD OF FISHERIES MEETING**

WHEREAS, Southeast Alaska's salmon hatchery programs have successfully operated for almost 50 years, supplementing wild salmon harvests and supporting commercial, sport, subsistence, and personal use fisheries across the state, which are vital to communities such as Sitka; and

WHEREAS, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery-supported ecosystem in Southeast Alaska and threatening the stability of salmon resources on which coastal communities like Sitka depend; and

WHEREAS, a reduction in hatchery production would not only diminish the availability of salmon for commercial but would also limit access to salmon for subsistence, personal use and sport fishers, thereby directly impacting food security, cultural practices, and recreational opportunities in communities like Sitka; and

WHEREAS, Alaska's salmon hatchery program is responsible for supporting approximately 4,200 jobs, \$219 million in labor income, and \$576 million in economic output annually, benefiting over 14,000 Alaskans who earn part of their livelihood from hatchery salmon; and

WHEREAS, the Southern Southeast Alaska Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play critical roles in generating economic stability, providing jobs, and supporting local communities through hatchery operations; and

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

WHEREAS, the current data on hatchery impact on wild salmon populations remains inconclusive and does not substantiate the drastic cuts proposed by Proposal 156; and

WHEREAS, Alaska's hatchery system operates as a nonprofit model funded through cost recovery and enhancement taxes, following stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups; and

WHEREAS, Proposal 156 introduces an additional oversight mechanism that would conflict with the established regulatory framework, risking the proven balance between hatchery and wild stocks that has been achieved under existing management;

NOW, THEREFORE, BE IT RESOLVED BY THE SITKA ECONOMIC DEVELOPMENT ASSOCIATION OF THE CITY OF SITKA, ALASKA, THAT:

Section 1. The Sitka Economic Development Association strongly opposes Proposal 156, scheduled for consideration at the January 28 - February 9, 2025, Alaska Board of Fisheries meeting, and urges the Board to reject this proposal to prevent detrimental economic and social impacts on Alaska's hatchery programs and the communities they support.

Section 2. The Sitka Economic Development Association reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to Sitka's economy, community well-being, and sustainable fishery practices.

Section 3. The Sitka Economic Development Association calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska's hatchery programs bring to all residents.

PASSED AND APPROVED BY THE SITKA ECONOMIC DEVELOPMENT ASSOCIATION OF THE CITY OF SITKA, ALASKA, THIS 9th DAY OF January 2025.

Dated January 9th ~~August 22~~ 2025 *aw*


Cory Baggen, President


Ptarmica Garnick, Secretary

Attested by:


Garry White, Executive Director

Submitted by: Marsh Skeele
Sitka Seafood Market

Community of Residence: Sitka, Alaska

I am supporting proposals 109 and 110 with RC amendments-- both maintain the current management plan structure and offer different approaches to addressing increasing effort in nonresident sport fisheries in the context of lower all-gear catch limit scenarios. The proposals prescribe different management measures at different levels of harvestable Chinook abundance.

I oppose Proposals 108 and 113-- which seek reallocation from our historic and primarily resident troll fishery to an expanding non-resident sport fishery.

Marsh Skeele



204 SIGINAKA WAY, SUITE 300
SITKA, ALASKA 99835
MAIN: 907-747-3207
FAX: 907-747-4915
SITKATRIBE.ORG

January 2, 2025

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

Members of the Board of Fisheries,

I write on behalf of the Sitka Tribe of Alaska (STA), tribal government in Sitka, Alaska, with over 4,500 Tribal citizens. As a tribal government, STA is responsible for the health safety, welfare, and cultural preservation of its tribal citizens. STA submits the following comments on proposals for the Board of Fisheries 2025 Southeast / Yakutat Finfish and Shellfish meeting.

King Salmon Proposals

Sitka Tribe of Alaska supports measures that protect opportunities for tribal citizens to harvest important traditional foods, such as king salmon. An “off-the-top” king salmon allocation for subsistence harvesters and in-season management of king salmon help ensure access to king salmon for tribal citizens and increase the likelihood that conservation objectives can be achieved. **STA supports proposal 104.**

Subsistence Salmon Proposals

Sitka Tribe of Alaska supports the use of seine gear in the Redoubt Bay subsistence fishery when the escapement is greater than 40,000 sockeye salmon as it would increase subsistence harvest options to tribal citizens. STA does have concerns that “stacking” permits could lead some parties to unintentionally overharvest sockeye salmon on some occasions. Therefore, **STA supports an amended version of Proposal 135 to allow subsistence seine gear in Redoubt Bay without the stacking of permits.**



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Herring Proposals

Sitka Tribe of Alaska supports measures to manage Sitka herring more conservatively. To this end, **STA supports Proposals 171, 173, 174, 175, 176, 177, 178, 179, 181, 188, 189, and 190.**

Proposal 171: STA appreciates the Alaska Department of Fish and Game’s (ADFG) efforts to update their original estimate of average unfished biomass (AUB; Carlisle 1998) and adjust the Sitka Sound herring harvest control rule. STA appreciates ADFG’s review of herring management in other areas and **supports the 15% harvest rate cap.** STA would support a 10% harvest rate cap as well (see Proposal 177).

STA expresses two concerns with the ADFG study (Roberts et al. 2024) used to develop with proposal. First, it did not include data from 2023, which was the second-largest recruitment on record. STA understands that the study needed to be completed in time to develop the proposal submitted here. However, it is a meaningful data point and should be included in an analysis of AUB.

Secondly, the simulated biomass does not appear to reflect the frequency of observed patterns of large abundance. For example, the forecast biomass for 2024 was 406,228 tons. Figure 5 in Roberts et al. (2024) shows an example simulation; during the 30,768 year simulation, a biomass of >400,000 tons is only simulated on five or six occasions, implying that the forecast biomass for 2024 was a one in 5,000 year event.

Proposal 181: STA wishes to provide additional context for its proposal to limit the number of test sets and released sets in the sac roe herring fishery. The four options presented in the proposal are intended to act as a “menu” for the Board to select the option(s) it feels best address the goal of limiting unnecessary stress and mortality on herring. The values presented in the proposal (test sets per day, test sets per season, and test set volume per season) are based on the long-term medians from data provided by ADFG (complete data are not available for sets released during commercial fisheries). On at least one occasion during commercial fisheries in 2023, ADFG used a “three strikes and you’re out” guideline to limit the number of released sets and ensure harvested herring met market quality demands. STA would like ADFG to return to this rule as it is simple, clear, and effective.



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Proposals 182 and 183: STA cannot support these proposals as written. STA could support an open-pound spawn-on-kelp (SOK) fishery as a **replacement** for the current sac roe fishery, though mechanisms to prevent conflicts with subsistence harvesters would need to be addressed in detail. As written, these proposals would allow for both a sac roe and an SOK fishery simultaneously. These proposals would likely result in additional conflict with subsistence users, as there is considerable overlap between the ideal harvest areas for commercial SOK and subsistence harvesters. Additionally, any harvester choosing SOK instead of sac roe (Proposal 182) should result in a reduction in the sac roe Guideline Harvest Level (GHL) equivalent to an “equal quota share” of the GHL. Lastly, these proposals provide no recompense to the many commercial spawn-on-kelp harvesters in Sitka Sound that predated the sac roe fishery.

However, an open-pound spawn-on-kelp fishery is a potentially interesting **replacement** for the sac roe fishery. An open-pound SOK fishery causes zero mortality on adult herring and does not stress spawning fish. ADFG estimates Sitka herring survival rates are near 70% annually, meaning that any herring left in the water is likely to spawn at least two more times than if captured in the sac roe fishery. While the location and number of pounds would have to be carefully considered to minimize conflict with subsistence users, an open-pound SOK fishery is an intriguing alternative to the current tension between the sac roe and subsistence fisheries.

Please contact Jeff Feldpausch, Resource Protection Department Director, at jeff.feldpausch@sitkatriben-sn.gov with any questions. Thank you for your thoughtful consideration.

Sincerely,

Dionne Brady-Howard
Tribal Chairman



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References

- Carlile, D.W. 1998. Estimation and evaluation of a harvest threshold for management of the Sitka herring sac roe fishery based on a percentage of average unfished biomass. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 1J98-18, Juneau.
- Roberts, C.L., S.E. Miller, and S.C. Dressel. 2024. A simulation study to estimate the unfished biomass of Sitka Sound Pacific herring. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report No. 1J24-01, Juneau.



Tribal Council Resolution 2025-1

OPPOSING PROPOSAL 156 TO BE CONSIDERED

AT THE JANUARY 28 - FEBRUARY 9, 2025, ALASKA BOARD OF FISHERIES MEETING

WHEREAS, Southeast Alaska's salmon hatchery programs have successfully operated for almost 50 years, supplementing wild salmon harvests and supporting subsistence, personal use, cultural practices, and recreational fisheries that are vital to sustaining indigenous ways of life; and

WHEREAS, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery-supported ecosystem in Southeast Alaska and threatening the stability of salmon resources upon which tribal communities rely for food security, traditional practices, and cultural continuity; and

WHEREAS, a reduction in hatchery production would limit access to salmon for subsistence, personal use, and other essential practices, thereby directly impacting the cultural traditions, heritage, and food sovereignty of Tribal citizens; and

WHEREAS, the Southern Southeast Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play critical roles in preserving salmon resources essential for the continuation of Tribal traditions and community well-being through hatchery operations; and

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning for these organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically supported a balance between enhancing salmon availability and protecting wild stocks; and

WHEREAS, the current data on hatchery impact on wild salmon populations remains inconclusive and does not substantiate the drastic cuts proposed by Proposal 156; and

WHEREAS, Alaska's hatchery system operates as a nonprofit model funded through cost recovery and enhancement taxes, following stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups, including Tribal communities; and

WHEREAS, Proposal 156 introduces an additional oversight mechanism that would conflict with the established regulatory framework, risking the proven balance between hatchery and wild stocks that has been achieved under existing management;

NOW, THEREFORE, BE IT RESOLVED THAT:

Skagway Traditional Council opposes Proposal 156, scheduled for consideration at the January 28 - February 9, 2025, Alaska Board of Fisheries meeting, and urges the Board to reject this proposal to prevent detrimental impacts on Alaska's hatchery programs and the indigenous ways of life they support.


Section 2. Skagway Traditional Council reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to sustaining salmon resources critical for subsistence, cultural practices, and the continuity of indigenous traditions.

Section 3. Skagway Traditional Council calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, Tribal leaders, and the hatchery community to ensure that management decisions reflect the cultural and subsistence value Alaska's hatchery programs bring to indigenous peoples.

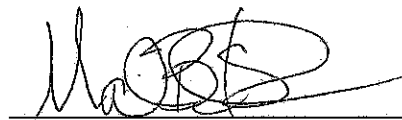
CERTIFICATION

The foregoing resolution was adopted at a duly called meeting of the Skagway Traditional Council, held on 1/9/2025 at which a quorum was present by a vote of

3 IN FAVOR, 0 AGAINST, 0 ABSTAIN, 2 ABSENT.


STC - Tribal President

Attest:


STC - Tribal Secretary

I would like to thank the members and Chair for their service and for giving me an opportunity to be heard.

My name is Lucas Skordahl, I am 41 years old and I have lived in Sitka Alaska my whole life. My Father was a commercial fisherman who taught me all I know about fishing. I am fortunate to be able to follow his footsteps and support a family with the resource provided by this great state.

I support Proposals 109 and 110

I oppose proposals 108 and 113

My concern is for the commercial chinook troll fishery in Southeast Alaska.

My entire fishing career of about 25 years I have been testifying to this council about one thing in particular. I ask the council to please do the right thing and do not allocate commercial fish to the charter sector. And here we are again. The fact that I have to raise my hand and say "NO, I cannot afford to allocate more fish to the charter sector" is frustrating, heartbreaking, and really an emotional subject that brings great division in our community.

As I'm sure you are aware the commercial industry as a whole has been struggling since the pandemic. And the salmon trollers are no exception.

Salmon Trolling in southeast Alaska is what I call an AFFORDABLE ENTRY fishery. What I mean by that is Trolling, compared to other fisheries is relatively cheap to get into. Most Trollers are financially stretched thin and struggling to stay in business. You'll hear the charter sector tell you that we can diversify, or focus on other species than chinook. This is false. Most Trollers cannot afford to get into another fishery and cannot afford to lose any more income to the GROWING charter sector and in particular non-resident anglers.

- Prioritizing Non-resident 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.

Thank you again for your service and for listening to my concerns.

Submitted by: Jacob Smith
F/V Valle Lee

Community of Residence: Sitka

Hello, my name is Jacob Smith. I am the operator of the F/V Valle Lee in Sitka; participating in the SE salmon troll fishery and longline fisheries for halibut and black cod respectively. I am very concerned about the impact that proposals number 108 and 113 will have on myself, my neighbors and my community as a whole. Allocating fish from the troll quota to support the charter fleet will only serve to hurt the livelihoods of the local residents of SE Alaska. The economics of commercial fishing is entirely dependent on how many fish we catch to our livelihoods work and a large percentage of the families In all of our towns depend on the income from trolling in one way or another. As we all know, sportfishing is about the activity and not so much a guarantee of catching fish. Charter boats can charge however much money they feel like from their passengers regardless of the catch. They are predominantly non-residents of Alaska and mainly take non-residents to go fishing, making their money off of the activity and not the catch. These past few years have economically been very tough for myself and everybody I know. Taking more king salmon away from us (proposal 113), or adding the uncertainty that we will be allowed to harvest the number of fish that we have been allocated because the sport fleet harvested more than they were supposed to would only serve to harm the economy of this wonderful state and add financial stress to the communities and residents who are already struggling. If you read this than I thank you very much for your time.

-Jake Smith

F/V Valle Lee

Sitka, AK

I support Proposal 224 and most of Proposal 225, excluding the August 15th start date.

Prior to the commercial shrimping season starting on May 15th in 2022, we were able to harvest a reasonable amount of spot prawn shrimp for ourselves and our sons. Changing the commercial harvest to May 15th decimated the sport shrimp harvest for the residents.

The following data from our shrimp harvests (all listed in spot prawns quarts of tails) in the Endicott/Tracy Arm and the Hobart/Windham Bay areas demonstrates this decimation:

2020:

Endicott/Tracy Arm: 0.52 quart per pot
 Hobart/Windham Bay: 0.98 quart per pot

2021:

Endicott/Tracy Arm: 0.51 quart per pot
 Hobart/Windham Bay: 0.78 quart per pot

Decreases in Harvests:

2022 (start of commercial season to May 15th):

Endicott/Tracy Arm: 0.41 quart per pot
 Hobart/Windham Bay: 0.16 quart per pot

<u>2020</u>	<u>2021</u>
21.2%	19.7%
83.7%	79.5%

NOTE: 0.16 is more than 1/8th (0.125) but less than 3/16th of a quart

2023:

Endicott/Tracy Arm: 0.31 quart per pot
 Hobart/Windham Bay: 0.36 quart per pot (about 1/3 of a quart)

<u>2020</u>	<u>2021</u>
40.4%	29.6%
63.3%	53.9%

2024:

Endicott/Tracy Arm: 0.28 quart per pot
 Hobart/Windham Bay: 0.28 quart per pot (about ¼ of a quart)

<u>2020</u>	<u>2021</u>
46.2%	45.1%
71.4%	64.2%

With harvest decreases as much as 83.7% in the Hobart/Windham Bay areas and 46.2% in the Endicott/Tracy Arm areas, it's clear the sport shrimp harvest has been decimated by the commercial harvest. Further, our abismal shrimp harvests during the summers of 2022 through 2024 have consisted of small, not medium sized, spot prawns. The harvests during June, following the commercial season, are the worst, with the shrimp nearly wiped out. The August harvests are only slightly better.

In our slow boat, it takes 5 hours to travel to Harbor Island in the Tracy Arm area from Aurora Harbor in Juneau. Likewise, it takes 8 hours to get to Entrance Island in Hobart Bay. Obviously, it's a serious time commitment to travel to these shrimping areas. Besides the travel commitment and fuel cost, there are time and financial commitments to buying and prepping the pots, line and buoys, as well as baiting them, and then dropping them in spots we have researched over the years. Pulling the pots up is also a lot of work, especially when the harvest barely justifies all the work entailed only to discover empty pots or shrimp too small to keep.

Usually we fish for shrimp over a 2.5 month period during the summer. The amount of shrimp we harvest is negible compared to the 2023 commercial harvest of 40,000 pounds (a reduced limit) in

District 1. (According to Alaska Fish and Game, prior to the 2023 limit reduction, the 10-year average harvest was 62,800 pounds in District 1 (Southeast Alaska)).

I strongly support the return of the commercial season to begin in October as it had been prior to 2022. I would even support an earlier start of the commercial harvest in September. As demonstrated by the 10-year average commercial harvest numbers, the commercial shrimp harvests have not been impacted by the small amount of shrimp harvested by the sport harvest. However, starting in 2022 the May commercial shrimp harvests have decimated the sport shrimp harvests, leaving practically no shrimp for sport harvesters. Shrimp, as a resource, should be available to harvest to all residents, not just for commercial harvestors to sell these shrimp outside of Alaska.

Linda Smith

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 W. Smoker of Juneau, Alaska. I am a sports fisherman. I doubt that Proposal 156 would have a substantial positive effect on the fitness of wild salmon stocks; the basis for my doubt is given in my record of peer-reviewed research, linked below. I have faith in the hatchery management and fishery management policies and procedures of the State of Alaska including the Regional Planning Team process to protect the fitness of wild stocks; the basis for my faith is the certification of salmon fisheries as sustainable including the Responsible Fisheries Management program a process in which I have participated.

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.

My Background:

- Professor of Fisheries Emeritus, University of Alaska.
<https://www.uaf.edu/cfos/people/faculty/detail/william-w-smoker.php>
- Author of 67 Peer-Reviewed scientific research reports and review papers in the scientific literature <https://www.uaf.edu/cfos/files/people/smoker-publications-2019.pdf>
- Chair, Fisheries Standards Committee (Conformance Criteria Committee), Alaska Responsible Fishery Management Program
- Member, Alaska Hatchery Research Project Science Panel, Juneau. 2011–present
- Member, Hatchery Scientific Review Group, State of Washington. 2000–2008
- Member, Board of Directors, Prince William Sound Aquaculture Corporation, Cordova. 1994–2016
- Member, Board of Directors, Sitka Sound Science Center, Sitka. 2008–2012
- Member, Independent Science Review Panel, Northwest Power and Conservation Council, Portland. 1999–2005

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 W. Smoker
Juneau, Alaska



Submitted by: Russell Snell

Community of Residence: Sitka ak

To the BOF SE and Yakutat fin fish meeting.

Greetings , my name is Russell Snell, I have been a commercial fisherman since 1979, and a salmon fisherman since 1989. I live and fish out of Alaska , and I am an advocate of commercial trollers and resident sport fishermen. As a troller we are a low volume fishery and depend on our quality to get a good price. We catch our fish one hook at a time , and immediately clean them and ice.as a commercial troller we face many obstacles ie; wild fish conservation lawsuits , pacific salmon treaty , where Alaska seems to lose more quota at treaty meetings despite our abundant returns, and ESA listing lawsuits. In the last 2 years commercial trollers have been denied a second opening because of the non resident sport fleet over fishing their quota by over 17,000 king salmon each year. I strongly believe this is result of no in season management for the NR sport fleet , and no penalty for them going over the quota resulting in the commercial fleet losing over 2 million \$ of marketable king salmon we lost. I feel this shows favoritism toward the NR sport fleet and has caused bitter animosity in our communities. All the money I make stays here in Alaska , I live here full time on my boat and fish the spring hatchery , summer , and winter seasons. Trolling is the most affordable permit to buy and is deemed an entry level fishery. Crew is harder to come by because of the recent hardships in the last 5 years .i strongly oppose proposal 108, and 113 which reallocates king salmon to a sector (NR sport fleet which has over harvested their allocation unchecked.this also shows a great favoritism toward. The NR sport fleet. Sustainability should be paramount in all fishing sectors , but these proposals take away king salmon from trollers who live and work here who are already struggling. These proposals are confounding and takes away from the troll fleet to a non resident fleet that already overfishes with no penalty. I strongly support proposal 109, and 110 . All fishing sectors should be managed the same with no favoritism. I cannot stress enough to

- 1) maintain the 80/20 split between commercial and sport trolling with each sector to stay within its allocation.
- 2) authorize in season management by ADFG to insure the sport fleet allocation is not exceeded. And
- 3) prioritize resident sport harvest within the sport allocation by controlling NR sport harvest.

In all my years fishing I have noticed is that a happy community is where there is a balance of wealth and opportunity. If favoritism is allowed to continue with different management laws for different sectors , there will always be animosity and tension. This cannot be a decision based on what fishing sector has more money to lobby their cause. Sustainability of our fisheries and our Alaska communities should always be forefront and not just a buzz word we use at meetings.

Submitted by: Amelia Sommer
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. I strongly care about my community and want to see a healthy future with sustainable policies.



Southeast Alaska Fishermen's Alliance^{PC468}

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Juneau, AK 99801

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Website: <http://www.seafa.org>

January 14, 2025

Dear Alaska Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) a multi-gear/multi-species small boat association representing our 300+ members involved mainly in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. In the salmon division we have members involved in the gillnet, troll and seine salmon fisheries, and some Prince William Sound salmon drift gillnet fishery. We also have members participating in other fisheries such as herring and dive fisheries. Within the longline division it represents SE longline (and pot) fisheries as well as halibut and sablefish quota share fisheries. Most of our membership also participates in personal use, subsistence and sport fisheries as well as taking home fishery resources from their commercial harvest which is documented on fish tickets.

SEAFA sent out in early December through the mail a simple survey regarding the Crab and shrimp proposals. We mention individual comments made by respondents on some proposals whether they match SEAFA's position or not as we have noticed when comments are made on a survey like this, they tend not to submit their own comments. We received a very low response rate to this survey. Most respondents were not members of SEAFA.

COMMITTEE OF THE WHOLE GROUP 1: Commercial, Sport, Personal Use Crab

KING CRAB

Proposal #233: SUPPORT

SEAFA supports proposal #233 to change the criteria for setting the start date for the Golden King Crab fishery to open during the smallest set of falling tides, on the date immediately following the peak high tide, from February 10th to the 17th. This will simplify determining the date the fishery would start. It is important that Proposal # 233 and the companion proposal #244 are treated the same as the two fisheries have concurrent seasons which the fishing industry does not want changed. This clarification of the date change should help provide the best set of tides on a fishery with a short season.

Proposal #234: SUPPORT

SEAFAs supports proposal #234 to change the start time of the Southeast Golden King crab fishery to 8:00 am. Again, with the concurrent fisheries of the Golden King Crab and Tanner crab fisheries in SE Alaska, the companion proposal #245 would also need to be consistent with any changes to this regulation. With a winter fishery, the more daylight provided to operate in the fishery, the safer the operating conditions. With an earlier start time it is likely that some fishermen will have time to set all their gear and start picking gear that day.

Proposal #235: SUPPORT

SEAFAs supports proposal #235 to add freezing spray to weather conditions for delaying the start of the fishery in addition to high wind conditions. This provides the fleet added protection for the safety of the participants. Again, the companion proposal #246 for the tanner crab fishery needs to be treated consistent with this proposal.

Proposal #236: AMEND & SUPPORT

SEAFAs supports proposal #236 if amended to allow commercial king crab pots to be stored prior to the fishery in waters up to 20 fathoms. All the Golden King Crab permit holders who responded to our mail survey supported this proposal. It is not appropriate to allow storage in waters up to 20 fms as districts and sub-districts as they close. The tanner crab fishery companion proposal that needs to be treated the same is #236.

Proposal #237: SUPPORT

SEAFAs supports expanding the defined Lower Chatham Strait golden king crab area to encompass areas that is not specifically listed as closed waters. Re-capturing these historical fishing grounds would provide more area for the fleet to spread out. This proposal is not asking for an increase in the guideline harvest limit (GHL) as the GHL was set based on the historical harvest which included harvest from the requested expanded area and the expectation is that the newly defined area would continue to have a GHR of 0-50,000 lb and the GHL to be determined as appropriate by the Dept. This area has a small amount of effort and makes up a small % of the harvest. Due to the low effort (generally 4 permits or confidential) and less productive fishing habitat, the GHL was not caught in any of the 2021-23 fishing seasons¹ so there should be minimal concern if the fishery pace increases.

Proposal #238: SUPPORT

¹¹ Messmer, A., Z. Chapman, J. Rumble, T. Bergmann, J. Stratman, K. Palof, and C. Stern. 2024 Management report for Southeast and Yakutat Dungeness, Tanner, Golden king and red king crab fisheries, 2021-2023. Alaska Department of Fish and Game, Fishery Management Report No. 24-25, Anchorage (RC 3, Tab 7 page 17)

SEAFAs supports proposal #238 to expand the defined Southern Area golden king crab area to encompass area that is not specifically listed as closed waters. Re-capturing these historical fishing grounds would provide more area for the fleet to spread out. This proposal is not asking for an increase in the guideline harvest limit (GHL) as the GHL was set based on the historical harvest which included harvest from the requested expanded area and the expectation is that the newly defined area would continue to have a GHR of 0-25,000 lb and the GHL to be determined by the Dept based on stock health in the area. As stated in proposal #237, effort and harvest is low in this management area and should not be a cause for concern.

Proposal # 239: SUPPORT

SEAFAs supports proposal #239 to split the GKC Northern management area into two areas, Upper Northern Area and Lower Northern Area with the Guideline Harvest Range divided between the two areas as recommended in the ADF&G staff comments (RC2, page 17):

Upper Northern Area GHR 0 – 81,200 lbs

Lower Northern Area GHR 0 – 63,800 lbs

SEAFAs could also support the 50/50% split as outlined in the proposal as an alternative. Anecdotal information from the fishermen is that the timing of the two areas is slightly different due to the extreme distance of 147 nautical miles north to south.

Proposal #240: AMEND & SUPPORT

SEAFAs supports the intent of Proposal #240 but as written, it is mostly misunderstood. The proposer would like to have golden king crab pots in the water fishing as a permit holder goes to unload tanner crab from an area that is closing/closed. You would not be able to pull baited king crab pots while the tanner crab is onboard in the closed area but the baited pots could be left in the water until the tanner crab is unloaded and the vessel has unregistered for the tanner fishery.

Proposal #241: SUPPORT

SEAFAs supports proposal #241 to allow the use of groundfish pots (slinky pots) in the king crab fishery (Golden, Red & Blue king crab). Groundfish pots have less bycatch and whale depredation issues than longline gear that is currently allowed for use during an open king crab fishery. We would recommend consistent handling of the companion proposal #248 for the Tanner crab fishery. Regulatory language based on other regions that allow groundfish pots for bait that would possibly mitigate some of ADF&G and enforcement's concerns are:

5 AAC 34.128 - Operation of other gear in Registration Area A

(a) A person or vessel that operates commercial, subsistence, personal use, or sport pots or ring nets, other than commercial shrimp pots, [OR] Dungeness crab pots, **or groundfish pots** during the 30 days immediately before the scheduled opening date of the commercial king crab season in Registration Area A may not participate in that king crab fishery.

(b) Notwithstanding [5 AAC 31.053\(d\)](#), [5 AAC 32.053\(d\)](#), and [5 AAC 34.053\(2\)](#), a person or vessel may operate commercial shrimp pots or Dungeness crab pots during an open king crab season in Registration Area A if the commercial shrimp or Dungeness crab season is open in Registration Area A at the same time as the commercial king crab season.

(c) Notwithstanding 5 AAC 34.053(2) a person or vessel may longline up to 20 commercial groundfish pots or collapsible groundfish pots (slinky) for bait prior to and during the Registration Area A Golden King Crab or Tanner crab fishery. Sablefish and halibut, may not be used for bait and must be immediately and carefully released unharmed. Groundfish pots or collapsible groundfish pots (slinky) must be marked as described in 5AAC 28.050 (b)(1)(2). All collapsible groundfish (slinky) pots must contain escape mechanisms as outlined in 5AAC 39.145.

We believe that the above language addresses most of the Dept's concerns including providing pot limits. Most pot fishermen use strings of slinky pots have them in strings of 40 pots. In discussions, 40 pots appeared to be too excessive and are therefore proposing 20 pots which matches the requirement in the Bering Sea regulations. The references to 28.050 (b)(1)(2) provide the marking requirements that are used in other fisheries, it prohibits the retention of sablefish and halibut and for the immediate and careful release of these species. Allowing the use of groundfish pots (slinky) significantly reduces bycatch and whale depredation. An additional requirement the board could consider is registration tags as outlined in 5AAC 28.050(f).

Proposal #242: OPPOSE

SEAFAs opposes the reallocation of Section 11-A red king crab guideline harvest to the personal use fishery. The personal use fishery is currently allocated 60% of the guideline harvest in 11-A and enjoys exclusive access to a large area (the most productive portion) of 11-A which has long been closed to commercial fishing for red king crab.

The underlying argument of this proposal is that a commercial harvest of the 40% allocation in Section 11-A could constitute overfishing and cause a closure of both the personal use and commercial fishery the following year(s). If that 40% were reallocated and caught by the personal use fishermen, wouldn't it cause the same closure? It

doesn't matter who takes the crab if you are taking too many crabs. If catching the full guideline harvest amount in Section 11-A is not too many crabs then the commercial fishery is not closing the personal use fishery by having a fishery occur.

The staff comments regarding the effect of the proposal if adopted² state the importance of Section 11-A biomass contribution to the calculation of the regionwide red king crab GHL. There has been 11 commercial openings for RKC since 1994/95. If 11A were excluded from calculation of the commercial GHL, 4 of those commercial openings would not have occurred. Section 11-A contributes up to 29%³ of the commercial red king crab harvest since the mid 1990's to commercial fisheries.

The ability to harvest red/blue king crab exists in 4 of the different limited entry permits in Southeast Alaska crab fisheries. (See table in next proposal). Only 1 permit is held by a participant with residency outside of Southeast Alaska. 25% of the permits are held by Juneau residents. While the regional RKC fishery does not happen as often as the permit holders would like, it is a good economic boost for the participants and the communities when the fishery occurs. In addition, the sale of red king crab through dock sales is very important to those local community residents that don't have access to a boat to participate in the personal use fishery.

Personal use fisheries often lack the same level of monitoring and enforcement as commercial fisheries, which could result in damaging the fisheries' long-term sustainability. The commercial red/blue king crab fishery harvest data both within and outside of Section 11-A is accurate through fish ticket data, sampling and robust enforcement, but there are significant concerns about the accuracy of the personal use harvest records. Anecdotal information based on talk around town and pictures on the internet about the number of crabs individuals harvested imply a different picture of the overall harvest.

SEAFa checked this summer when asked by a member that you can put a king crab pot out prior to the opening of the Section 11-A personal use fishery, you just can't keep a red king crab until one minute after the fishery opens. This allows for prospecting and stockpiling red king crab prior to the personal use fishery starting. In contrast, the commercial fishery is subject to a thirty-day stand-down period prior to the commercial fishery opening. This is relevant in light of the short fishing periods for the commercial fleet in 11-A, just 24 hours in each of the last two seasons, 2011 and 2017 when the commercial fishery was open.

As previously stated, the underlying premise of this proposal is that if a commercial fishery occurs, the stock is overfished. A commercial fishery has not taken place since

² RC Staff comments page 22

³ RC Staff comments page 22

2017 but look at the Lynn Sisters area which is a survey area important to have a healthy stock to the commercial sector to reach our 200,000 lb threshold. Due to it's proximity to Juneau increased fishing by the personal use fishery is occurring in the area and has now declined to a below average status⁴.

This would occur in exchange for a very limited upside to the Juneau personal use fishery, In the five years between 2018/19 and 2022/23 seasons, and average of 1,521 personal use permits were issued for red king crab in 11-a. During the Same period the year average of commercial allocation in numbers of crab was 1,347 crabs. If those crabs were reallocated to the personal use benefit, it would be an additional 1 crab per household per year, a poor exchange for the economic value the commercial feet would produce with a regional commercial fishery. This would include raw fish tax to the communities, crew shares in a time of the year where much is not happening, fuel, gear and supply purchases etc.

This proposal has a major and a devastating impact on the commercial red king crab fleet regionwide as the fishery is much more likely to remain closed with Section 11-A biomass no longer counting towards the threshold level to open the commercial fishery. Without Section 11-A biomass in the calculation, it is unlikely there will be a commercial fishery with the current 200,000 lb threshold.

Proposal #243: SUPPORT

SEAFA supports proposal #243 to amend the *Southeast Red King Crab Management Plan* to allow a commercial red king crab fishery at lower levels of abundance using an individual catch limit (ICL). This proposal was a plan developed between industry and ADF&G staff last board of fish cycle but due to some confusion, the Board of Fish did not pass the proposal. This proposal does not get to where the fishermen would truly like to be which is to have a more consistent fishery year after year. But, the plan does provide a little more opportunity and allows the Dept and industry to further refine a proposal that is more suitable in the long run or it is possible during this cycle further refinement can be adopted. There are some red & blue king crab permit holders that hold a permit and still owe money against the permit or have never fished the permit since the purchase of the permit. The king and tanner crab permit system is a little more complicated than a lot of other fisheries with 7 different permits with different combinations of allowable species. The table below shows the permit type and the number of resident and non-resident permit holders by permit type. There are only 60 red & blue king crab permits with 98% Alaska residency (only 1 non-resident). This is

⁴ SE AK Red King Crab Stock Assessment [presentation](#) from the King and Tanner Task Force December 2024 meeting

very much a small community Southeast resident fishery. A red king crab commercial fishery allows individual Southeast Residents who don't have their own vessel access to fresh red king crab through dock sales, restaurants, and local grocery stores.

Permit Type	Species	Resident Permit holders	Non-resident Permit holders	Total Permits per permit type	RED & Blue King Crab Only
K19A	Red & Blue King Crab	9		9	9
K29A	Red, Blue & Brown King Crab	5		5	5
K39A	Brown King Crab	7	1	8	
K49A	Red & Blue King Crab & Tanner	15		15	15
K59A	Brown King Crab & Tanner Crab	5		5	
K69A	Red, Blue, Brown King Crab & Tanner	30	1	31	30
T19A	Tanner Crab	25		25	
TOTAL	All Species	92	2	95	60

In staff comments, the Dept raised concerns about where individuals would be fishing. The plan discussed last cycle and as stated in the proposal by ADFG would need to include registration, call in's (frequency TBD by the Dept) and logbooks for the individuals participating in the fishery. Three years ago, when the plan was developed, it was discussed that the Dept would be closing individual areas when the GHL for that area was reached. Leaving the permit holder that waits to fish likely less areas to harvest crab in and most likely the less productive grounds to fish in.

If proposal #242 were to be adopted with the Section 11-A crab fully allocated to the personal use fishery it is unlikely this proposal would provide any fishing opportunities to the commercial fleet.

Proposal #244 SUPPORT

SEAFa supports proposal #244 to change the criteria for setting the start date for the Golden King Crab fishery to open during the smallest set of falling tides, on the date immediately following the peak high tide, from February 10th to the 17th. This will simplify determining the date the fishery would start. It is important that Proposal #244 and the companion proposal #233 are treated the same as the two fisheries have concurrent seasons, the fishing industry does not want to see that changed. This clarification of the date change should help provide the best set of tides on a fishery with a short season.

Proposal #245 SUPPORT

SEAFa supports proposal #245 to change the start time of the Southeast Golden King crab fishery to 8:00 am. Again, with the concurrent fisheries of the Golden King Crab and Tanner crab fisheries in SE Alaska, the companion proposal #234 would also need to be consistent with any changes to this regulation. With the middle of the winter fishery, the more daylight provided to operate in the fishery, the safer the operating conditions.

Proposal #246 SUPPORT

SEAFa supports proposal #246 to add freezing spray to weather conditions for delaying the start of the fishery in addition to high wind conditions. This provides the fleet added protection for the safety of the participants. Again, the companion proposal #235 for the tanner crab fishery needs to be treated consistently.

Proposal #247: AMEND & SUPPORT

SEAFa supports proposal #247 if amended to allow commercial tanner crab pots to be stored prior to the fishery in waters up to 20 fathoms but this proposal must be treated consistently with proposal #236 for Golden King Crab. The majority of the tanner crab permit holders who responded to our mail survey supported this proposal. It is not appropriate to allow storage in waters up to 20 fms as districts and sub-districts close.

Proposal #248 SUPPORT

SEAFa supports proposal #248 to allow the use of slinky pots to catch bait in the Tanner crab fishery consistent with the treatment for proposal #241.

Proposal #249 SUPPORT

SEAFAs supports proposal #249 to allow a Tanner crab fishery participant to operate pot gear for subsistence, personal use or sport fisheries after unregistering from the commercial Tanner crab fishery. The addition of the exploratory Tanner crab areas adopted last cycle which keeps the fishery open until March 31, prevents a tanner crab fisherman from participate in other pot subsistence, personal use or sport pot fisheries. This would allow those participants an opportunity to participate in other pot fisheries if they have unregistered from the tanner fishery. The Dept has no conservation concerns about these stocks. Most tanner crab fishermen do not participate in the exploratory fishery and are done by the end of Feb but would be unable to operate pot gear for subsistence, personal use or sport fisheries until Mid April if this proposal is not adopted.

DUNGENESS CRAB

Proposal #250 OPPOSE

SEAFAs opposes proposal #250 to reduce the size of Dungeness crab in the subsistence and personal use fishery to 6-1/4". Dungeness crab is managed on a 3 S (size, sex and season) management regime and under this system has remained healthy. The 6-1/2" measurement is a biological size chosen to allow males to reproduce at least once before being available for harvest.

In our mail survey on proposals a comment one proposer made was, "I do not support more closed areas for the benefit of personal and subsistence use. I believe that the lower size limit for subsistence and personal use crab is one way to destroy the future of the fishery and the stock. Starting the season July 1st would be detrimental to my business."

Proposal #251 OPPOSE

SEAFAs opposes changing the start date of the Dungeness crab fishery to July 1st. In our mail survey of proposals we had 22 Dungeness crab fishermen oppose changing the start date and 2 supporting. While this is a low response rate SEAFAs, has no doubt the majority of the fleet is in opposition to this proposal. This starting date has existed for a long time and the crab fishery had maintained a sustainable and viable fishery even in the face of grounds being preempted by sea otter predation.

A comment received on our survey on this proposal was, "We already have a short season and starting on July 1st would hinder ability even more to make each year a season. It's getting hard to make a living at commercial fishing w/gillnetting under attack. Can we attempt to have one fishery to depend upon."

Proposal #252 SUPPORT

SEAFa supports the use of Slinky pots for bait without having to reduce the amount of Dungeness crab pots allowed to be used. We recommend a 20 pot limit and registration (possibly with tags) if using slinky pots for bait during the Dungeness crab fishery, a prohibition to using sablefish or halibut as bait (already in law we believe) and marking the pots as required in 5AAC 28.050 (b) & (f).

Proposal #253-257 All these proposals deal with allowing a person or vessel to participate in the Registration Area A commercial Dungeness crab fishery if they operated commercial shrimp pots during the 14 day immediately before the opening of the commercial Dungeness crab fishery.

SEAFa submitted and supports proposal #256. With the change in the shrimp fishery season timing to the spring, having a 14 day stand down period between crab and shrimp fisheries severely restricted the participants involved in both fisheries. Previously when the fall Dungeness crab fishery and the shrimp fishery both started on October 1st the fishermen would have to choose which fishery they were participating in or deregister from one fishery and switch to the other. This proposal does not allow for participation in the shrimp and Dungeness crab fishery simultaneous. This proposal allows shrimping up to the start of the crab fishery but still requires the fishermen to choose which fishery they are participating in when the fisheries are concurrent by registering and deregistering from fisheries.

Proposal #258 & #259

SEAFa supports *reevaluating* the closed areas to commercial Dungeness crab fishing. Proposal #259 which keeps the 20 closed areas closed to commercial crabbing for 10 months a year including the summer and open for the fall season Oct 1-Nov 30 would have less user conflicts between commercial, subsistence, personal use and sport participants than proposal #258. These closures mostly came about due to user conflicts than any type of resource conservation. The proposal authors and Staff comments in RC 2 on these two proposals are accurate that sea otter predation is pushing the commercial fleet into a much smaller area to fish it. The areas shut down are prime habitat, but some are not being utilized. In Proposal #258, an area that crab fishermen would like to particularly see reevaluated is a portion of Tenakee Inlet. A proposal for a portion of this area was submitted last cycle that could be considered.

Proposal #260 OPPOSE

SEAFa opposes proposal #260 to close the waters of George Inlet, Carroll Inlet and Thorne Arm to the commercial harvest of crab and shrimp. This is a fairly large area that is asking to be additionally closed to the commercial fleet when there is already several areas closed nearby for shrimp and crab as shown in the RC 2 Figure 260-1

map on page 61. If a closure is necessary to protect the usage of an area for local residents it should be closed to sport as well as commercial.

Proposal #261 OPPOSE

SEAFa opposes proposal #261 to close Traitors Cove to shellfish harvest by commercial and sport users. There is not conservation concerns with the shellfish resources in this area based on Staff comments in RC 2. Closure of this large area further condenses the commercial fleets into smaller area creating congestion.

Proposal #262 COMMENT

SEAFa supports the closure of an area to sport fishing when it is closed to commercial fishing to maintain the closed area for the benefit of resident subsistence and personal use fishermen if an area is necessary to be closed to provide for local residents.

COMMITTEE OF THE WHOLE GROUP 2: Commercial, Subsistence, Sport, Personal Use Groundfish Proposals

GROUND FISH

Proposal #191: SUPPORT

SEAFa supports ADF&G's proposal to add pot gear into the regulation for logbook requirements for groundfish. Having the data required in the ADF&G logbooks as the fleet moves over more into pot gear is essential to management of the fisheries.

Proposal #192 COMMENT

SEAFa suggests that if the Board supports proposal #192 to allow pots to be used in the personal use bottomfish fishery to be longlined they consider a requirement to mark the buoy with an LP as required on the commercial pots to notify someone in the area that this is a longline set of pots and not an individual pot.

Proposal #193: OPPOSE

SEAFa opposes proposal #193 which would allow the use of a deepwater release mechanism to return rockfish to the ocean. Current regulations require full retention of rockfish and allowing some fish to be released would seriously confuse the issue of what is retained when.

Proposal #194: SUPPORT

SEAFa supports ADF&G's proposal to reduce the size of escape rings to 3-1/2" on pots used to take sablefish in the commercial, subsistence and personal use sablefish fishery. The size was determined by ADF&G using the most current biological information available for allowing the smaller immature sablefish to escape the pot.

Proposal #196: WITHDRAW

SEAFa and ALFA have agreed to withdraw the proposal to reduce the size of escape rings in the sablefish fishery and are supporting the Dept's proposal #194.

Proposal #197: SUPPORT

SEAFa supports this ADF&G housekeeping proposal to include all groundfish gear types and consistency between users.

Proposal #198: COMMENT

SEAFa understands the desire to increase the bag limit for sablefish while the stocks are at a high level of abundance and other species such as halibut are at very low stock levels. That said we would request consideration be given to develop a threshold that when stocks are high the bag limit is relaxed but when the stock level declines which it will at some point the bag limit is returned to the four sablefish per day.

LINGCOD**Proposal #199: SUPPORT**

SEAFa supports proposal #199 to allow for weather days for the Demersal Shelf rockfish fisheries. This tool works very successfully in the Golden King crab/Tanner crab wintertime fishery and provides a more level playing field for the variety size of vessels participating in this fishery. As this fishery is not yet limited, it is one that younger fishermen are able to participate in more easily and likely using vessel on the smaller side.

Proposal #200: SUPPORT

SEAFa supports proposal #200 to adopt in regulation a requirement for reporting as directed by ADF&G in the directed lingcod fishery for management purposes.

Proposal #201: SUPPORT

SEAFa supports proposal #201 to clarify lingcod bycatch levels and the immediate release at sea any lingcod above the bycatch level or if the allocation has been reached and closed. Specifically including troll fisheries in this section provides clarity.

Proposal #202: SUPPORT

SEAFa supports proposal #202 to clarify the definition of dinglebar gear in the lingcod fishery.

PACIFIC COD**Proposal 204: SUPPORT**

SEAFa supports proposal #204 to allow pots to be longlined in State waters of the Eastern Gulf of Alaska commercial Pacific Cod Fishery. Pot gear has become more popular in several other fisheries and this would provide more tools to the fishermen in the Pacific Cod fishery. Pot gear harvests less bycatch species, and typically longlined pots have less gear loss compared to single pot gear. With less lines going to the surface there is further reduced possibility of traveling whales getting entangled in the buoy lines.

ROCKFISH

Proposal #211: SUPPORT

SEAFa supports ADF&G's proposal to clarify the regulations for rockfish overages in the groundfish, halibut and salmon troll fisheries.

COMMITTEE OF THE WHOLE GROUP 3: King Salmon

KING SALMON MANAGEMENT PLAN PROPOSALS

Proposal #105: SUPPORT

SEAFa supports ADF&G's position to comply legally with Magnuson Stevens Act (MSA) provisions, action on this proposal is necessary as the salmon fishery in Southeast Alaska is managed through a NPFMC fishery management plan. Our understanding from discussions with ADF&G staff is that all inside waters of the boundary line including contiguous/donut holes are considered State waters. The State is recommending in their staff comments, the EEZ waters should have regulations in the EEZ that match the more restrictive bag and possession of limits of non-residents in state waters. SEAFa is addressing this proposal first so that any actions taken on the king salmon plan specifically address the EEZ issue and includes the provisions necessary to clarify the more restrictive bag and possession of limits of non-residents in state waters apply to all users in the EEZ.

AMEND A PROPOSAL FOR KING SALMON MANAGEMENT PLAN ADOPTION

The King Salmon Management Plan proposals are incredibly confusing and a complicated issue that has a long history and a lot of conflict surrounding it. There are a variety of proposals that can be used as the vehicle for final action but all of them need to be amended to have a package that is supportable. The Ketchikan and Sitka Advisory Committees as well as a consensus document to be submitted by Alaska Trollers Association and Territorial Sportsmen Association have worked on trying to incorporate many of the key concepts necessary from the variety of proposals.

SEAFAs supports an amended proposal that includes the following concepts and priorities:

- Manage the sport fishery in-season to harvest 20% of the remaining annual king salmon allocation after deducting the net allocation.
- Moves the resident priority language up in the plan to emphasize the importance of this clause.
- Reinsert the word “sport fishery” throughout the plan where it was removed at the last Board meeting.
- Eliminate the provision that averaged the sport fish allocation over time. (The fishery has grown too significantly to continue this practice. It was unclear how averaging was meant to work was never articulated so everyone had their own idea of what and how the provision was to be enacted);
- Place the provision for two rods in the winter as part of the baseline management measures.
- Repeal the sunset language as being unnecessary as the plan comes up for tweaking every Board of Fish Cycle anyways.
- Include a provision into the King Salmon Management Plan that states the non-resident management measures (bag, possession, annual bag limits etc) will be the management measures in place for the EEZ for all users.

SEAFAs reemphasizes that any king salmon management plan must contain the following provisions. An allocation split of 80% troll and 20% sport; management authority to the Dept to provide the flexibility to ensure that sport fish allocation is not exceeded using in season management measures and a resident sport priority in state waters within the sport allocation.

SEAFAs has reviewed the work of ATA & TSI amended comments, Ketchikan AC work at this time but not the work of the Sitka AC. We support the work of the Ketchikan AC and ATA/TSI as being consistent with most of our comments. We would point out that the Ketchikan AC’s working group included charter industry participants.

Proposal #108: OPPOSE

SEAFAs opposes reallocation of king salmon to the sport sector. The 80/20% allocation split has been in effect since the mid 90’s and has worked well for the majority of these years but more importantly the split was hard fought compromise using the Board of Fish allocation criteria.

Proposal #113: OPPOSE

SEAFAs opposes the reallocation of king salmon to the sport sector. See proposal #108 comment.

KING SALMON – COMMERCIAL

Proposal #129: SUPPORT

SEAFa supports proposal #129 to add a second day to the Yakutat Bay spring troll fishery from 1 day to two. This will provide additional opportunity to reach the seasonal harvest limit without additional king salmon being allocated.

Proposal #130: COMMENT

Proposal #130 would allow the troll king salmon allocation to be fished in a single retention period beginning July 1st. This proposal was submitted as an alternative if an equitable king salmon management plan isn't agreed upon. But, any significant change to the management of a chinook fishery must be reviewed and approved by the Pacific Salmon Treaty and fishing the all the commercial king salmon troll harvest after winter and spring harvest being deducted would be considered a change by the Pacific Salmon Treaty Commission. See staff comments for more details about the effects of this proposal.

Proposal #131: SUPPORT

SEAFa supports proposal #131 to provide for a limited harvest fishery(ies) to occur in place of the second summer retention period. This proposal provides the Dept management flexibility when smaller allocations for treaty chinook salmon make a competitive fishery difficult to manage.

Proposal #169: SUPPORT

SEAFa supports proposal #169 which would allow the use of fishing rods in conjunction with downriggers by hand troll permit holders in the spring & summer commercial troll seasons. Enforcement had the same concerns about adopting this proposal for the winter season prior to it's adoption in 2006 and has been less of an issue than assumed.

COMMITTEE OF THE WHOLE GROUP 4: SEAK & Yakutat Subsistence, Commercial, Personal Use, & Sport Salmon and Trout; Enhancement & Terminal Harvest Area Proposals

Proposal #156: OPPOSE

SEAFa opposes proposal #156 to reduce the current permitted capacity of pink and chum salmon eggs at each Southeast Alaska (SEAK) Hatchery corporation. Similar proposals have been introduced for each meeting for several cycles and have all been voted down. As ADF&G wrote in RC2 *Staff Comments page 217* regarding the Dept of

Law Memo on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production (1997), the opinion noted that “**Board action that effectively revokes or prevents the issuance of a hatchery permit is probably not authorized.**”

This proposal suggests revisions to 5AAC 33.364 Southeast Alaska Area Enhanced Salmon Allocation Management Plan which does not have any connection to egg take goals whether taking from the wild or from a built up broodstock source. 5AAC 33.364 is strictly an allocation plan between gear groups to provide a fair and equitable split of hatchery returns partially based on the amount of assessment tax paid by a gear group.

The framework for revising or developing a hatchery return is public and open but conducted through the Regional Planning Teams and not the Board of Fish process and was developed that way by the Alaska State Legislature in determining who has what authority for the various actions.

Adoption of this proposal would have extreme effects on the regional economy and all user groups as well as the economic viability of the SEAK hatchery operations. Commercial fishermen targeting hatchery returns benefits wild stocks by taking the effort off them.

Proposal #157: SUPPORT

SEAFa supports proposal #157 to create a Terminal Harvest Area (THA) and associated management plan for hatchery runs at Burnett Inlet. This would allow the fleet an opportunity to clean up surplus fish after cost recovery and broodstock was achieved.

Proposal #158: SUPPORT

SEAFa supports proposal #158 which modifies the boundaries of the Hidden Falls THA and the Hidden Falls Special Harvest Area (SHA) in regulation. This is a housekeeping proposal that aligns the regulation with the actions that ADF&G have been taking through emergency orders.

Proposal #159 & #162: SUPPORT and AMEND

SEAFa supports proposals #159 & #162 submitted by SSRAA updating the *Wrangell Narrows-Blind Slough Terminal Harvest Area Salmon Management Plan*. There has been a change in management of the facility (Sport fish vs SSRAA) since the original management plan was written that an update is overdue. Aspects that need to be considered are: a refuge area for the fish to be protected at all abundance levels; access in fresh water when saltwater is open; catch and release under the current regulations are causing a lot of mortality particularly in the females necessary for broodstock collection; updating sport fish ban, possession and size limits. Comments on these two proposals also consider proposal issues raised in #160 & #161.

COMMERCIAL SALMON

Proposal #165: NO POSITION

Proposal #165 would change the start date of the Drift gillnet fishery to Monday rather than Sundays. The fleet has mixed feelings on this proposal. Some would like the Monday start as it would reduce conflict with sportfishermen on Sundays that don't quite grasp that Sunday morning there are no nets in the water and suddenly at 12:00 noon they need to be watching for nets and those fishermen that would like the opportunity to spend the weekend with their family and attend church. On the other side of the issue is ADF&G opposition to this proposal that pretty much comes up every cycle and the threat that we would actually receive less fishing time and less information for timely management as the Monday morning skiff interviews would not produce any information on status of the stocks.

Proposal #166: SUPPORT

SEAFSA supports proposal #166 to allow the use of deeper gillnets in District 11 by EO at the Departments discretion in sub-district 111-32 to help harvest our share of Taku treaty coho. We are concerned about the comments raised by the Dept in RC 2 Staff comments about the correlation between coho harvest and the Pacific Salmon Treaty but the language in the proposal providing the Dept discretion to use this tool should alleviate some of the concerns.

COMMITTEE OF THE WHOLE GROUP 5 – Herring

SITKA HERRING

Proposal #171: CONDITIONALLY SUPPORT

SEAFSA supports proposal #171 to modify the spawning biomass threshold minimum and maximum harvest rates for the herring sac roe fishery in Sections 13-A & 13-B. This proposal was submitted by ADF&G and is based on decades of science and data, but we would point out that the Dept could use the lower harvest rate without changing the sliding scale range. We assume this reflects the most recent information available on the Sitka herring resource although no new data/studies has been presented to the fleet. This proposal is more conservative than the current management program even as the Sitka herring resource is at an all time high. ADF&G should be allowed to continue to manage the fishery based on a cautionary and conservative approach that ensures the continued sustainability of the resource.

Proposal #172: OPPOSE

SEAFSA opposes proposal #172 to reduce the maximum allowable commercial harvest rate for the herring in SE Alaska from 20% to 15%. While proposal #171 lowers the harvest rate it is specific to Sitka Sound herring while proposal #172 lowers the harvest rate for all commercial herring fisheries in Southeast Alaska. The reason SEAFSA

opposes this change to the SE region wide allocation is the effect it would have on the Craig roe on kelp pound fishery. Had the 15% harvest rate been in effect it would have prevented this fishery from occurring 4 times. The Craig herring fishery is valuable and is in good shape therefore the harvest rate should not be changed to detrimentally effect this fishery.

Proposal # 173: OPPOSE

SEAFAs opposes proposal #173 to eliminate provisions to establish a guideline harvest level for the Sitka Sound Herring Sac Roe herring fishery under 5AAC 27.160.

Proposals #171 & #172 submitted by ADF&G accomplishes the same goal of lowering the harvest rate. This proposal might actually be trying to eliminate the commercial Sitka Sac Roe herring fishery by deleting the reference to the harvest rate in 5AAC 27.160(g) and not understanding the default would be the Southeast region wide harvest rate in 5AAC 27.190.

Proposal #174: OPPOSE

SEAFAs opposes proposal #174 to severely restrict the commercial Sitka Sac Roe Herring fishery when the fishery is sustainable. The Dept has submitted a proposal to manage the fishery more conservatively even when the stock biomass is at all time high level.

Proposal #175: OPPOSE

SEAFAs opposes proposal #175 to cap the allowable commercial harvest for the Sitka Sound Sac Roe herring fishery at 15,000 tons. There is no biological reason to cap the Sitka sac roe herring fishery in this manner. ADF&G has already submitted two proposals (#171 & #172) to manage the herring fisheries in Southeast Alaska in a more conservative manner and the Sitka Sound herring stocks is a at a high level of abundance.

Proposal #176: OPPOSE

SEAFAs opposes proposal #176 reducing the harvest rate to 10% of the stock when above the threshold. ADF&G already manages the fishery sustainably and conservatively and there is not a biological reason to restrict the commercial fishery this significantly.

Proposal #177: OPPOSE

SEAFAs opposes proposal #177 to reduce the minimum allowable harvest rate, change the harvest rate formula and increase the fishery threshold in the Sitka Sac Roe herring fishery. ADF&G manages the fishery conservatively and sustainably on a precautionary basis especially if proposals #171 & #172 are adopted.

Proposal #178: OPPOSE

SEAFa opposes proposal #178 to close additional waters to commercial fishing and to develop a fish reserve. There is already 16.5 square miles of near shore waters in Sitka Sound closed to commercial fishing with an additional 2 square miles closed under federal regulation. This area includes where historically herring have spawned and the commercial fishery has taken place. The Dept is directed by the *Sitka Sound Commercial Sac Roe Herring Fishery Management Plan* to distribute the commercial harvest by time and area to provide for subsistence opportunities.

Proposal #179: OPPOSE

SEAFa opposes the closing of Promisla Bay to Sitka Sound commercial harvesters. There are significant closed waters already. This area has been used in 4 of the last 10 years of the fishery. This suite of proposals is trying in all fashions to cripple the Sitka Sound sac roe herring fishery so it no longer exists. The Dept is directed by the *Sitka Sound Commercial Sac Roe Herring Fishery Management Plan* to distribute the commercial harvest by time and area to provide for subsistence opportunities.

Proposal #180: SUPPORT

SEAFa supports proposal #180 to align the latitude of Aspid Cape with the actual location of Aspid Cape for the southern boundary of the Sitka Sound herring sac roe purse seine fishery. We view this proposal as housekeeping.

Proposal #181: OPPOSE

SEAFa opposes proposal #181 to limit the number of test sets per day and season. ADF&G should determine what they feel is necessary to manage the Sitka Sound sac roe purse seine fishery conservatively and sustainably. The Dept is not going to authorize more test fishing than necessary for the data to manage the fishery.

Proposal #182: OPPOSE

SEAFa continues to oppose proposal #182 to convert Sitka Sound sac roe permits to a pound fishery. CFEC held a hearing on this issue previously and determined at that time that they had not made a mistake in designating the areas under limited entry for the Sitka Sound Sac Roe fishery and the L21A herring pound permit. Without this change the Board does not have the regulatory authority to adopt this proposal. In addition, SEAFa does not understand how this fishery could legally operate when some of the G01K permits (purse seine sac roe) participate in a purse seine fishery and some participate in a S01K (spawn on kelp) fishery in the area without allocating WITHIN a fishery. In 2005 in the case *Grunert V State of Alaska*, the Supreme Court of Alaska found the Board's (Board of Fisheries) authorizing statute, AS 16.05.251(e), permits the board to allocate fishery resources "among personal use, sport, guided sport, and

commercial fisheries," but not "between" the fisheries. The Limited Entry Act defines "fishery" as "the commercial taking of a specific fishery resource in a specific administrative area with a **specific type of gear**."⁵

The Board of Fish needs to quit holding out the possibility that this proposal would pass and happen. While it might be a good idea, if you look out at the next steps of how this would happen not the back and forth between Board of Fish and CFEC authorities, there is no way to share an allocation between two gear types, see Grunert V State of Alaska. While SEAFSA is not commenting on proposal #183 if you truly want to fish pound gear in the Sitka Sound area you need to use the current Northern SE Pound permit and carve out a portion of the Sitka Sound sac roe herring allocation. This is the only legal method that will allow herring pound fisheries in Sitka Sound.

COMMERCIAL HERRING

Proposal #188: OPPOSE

SEAFSA opposes proposal #188 which limits the number of hours in a day, the number of days and requires observers for all commercial herring fishing as well as limiting the total of all herring fisheries harvest to 15,000 tons. Limiting the fishing time as proposed would limit the Dept's ability to manage the Sitka Sound sac roe purse seine fishery to achieve spatial and temporal distribution as required by regulation as well as eliminate the potential for successful winter food and bait fishery and spawn on kelp fisheries.

Proposal #189: OPPOSE

SEAFSA opposes proposal #189 which reduces the length of a purse seine net used for commercial herring harvest. The purse seine sac roe herring fishery is managed sustainably and conservatively by the Alaska Dept of Fish and Game using combinations of time, area and harvest restrictions. Reducing the length of a herring purse seine only causes in-efficiency and more sets to be made to achieve the same GHL.

Proposal #190: OPPOSE

SEAFSA opposes this proposal to repeal the basic management plan for managing commercial fisheries in Southeast Alaska and replacing it with a consent based Co-management framework with Tribal Governments. Repealing the management plan provides ADF&G no direction, undermining the public process that has refined the management process over time. ADF&G and industry meet with the tribes pre-season to discuss the upcoming fishery which already provides consultation with the Tribe.

⁵ Michael GRUNERT, Appellant, v. STATE of Alaska and Chignik Seiners Association, Inc., Appellees.

COMMITTEE OF THE WHOLE – GROUP 6: Subsistence shellfish, commercial & sport shrimp, commercial and sport other miscellaneous shellfish

SHRIMP

Proposal #224 & #225 – NO POSITION

SEAFSA has members on both sides of the issue to move the shrimp season back to October 1st. SEAFSA does question what metric the Dept will eventually use to determine if the spring/summer season has benefited from the increased reproductive potential inherent in fishing in the spring they based this season change on. Long time fishermen have seen an increase in females being harvested and few males compared to their records from a fall fishery. That said many shrimp fishermen prefer the spring fishery over the fall, due to the better weather and different markets being utilized. Please see Appendix A that includes survey results from fishermen after the first spring season.

We sent out a mail survey in December regarding shellfish proposals but did not get many results back but for the shrimp pot fishery (only 17 shrimp responses) 14 supported a spring fishery and 4 wanted to see the fishery revert to October 1st. The majority of these responses were from non-SEAFSA members. Responses from most of our membership who responded were to support an October 1st fishery.

A comment was made on our survey that follows, “Shrimp are full of eggs in October and weather is increasing getting worse every day. The 8 am to 4 pm should be removed, it only benefits Catcher/Processors. The small guy like me requires good weather and slack tides to haul gear.”

Proposal #226 – OPPOSE

SEAFSA opposes proposal #226 which would reduce all the GHL’s in Registration Area A by 20% and reduce the number of pots allowed to be operated by a registered shrimping vessel by 40 to 50% and eliminate the large shrimp pot size over the next three years. This proposal has too many aspects within for a simple position to be taken.

The Board does not need to reduce the GHL as the Dept sets that yearly within a Guideline Harvest Range that is in Regulation. If the Dept believes they need to be more conservative either by District or regionwide they have that flexibility right now.

The mail survey we conducted mentioned previously had 5 in support of the proposal and 12 in opposition when simply asked about lowering the GHL and reducing the number of pots. We do not support a pot reduction without better discussion within the

fleet and particularly don't approve of eliminating the large pots. This would be a large economic cost to the permit holders who fish large pots to convert.

Proposal #227 - OPPOSE

SEAFa opposes proposal #227 to allow stacking of CFEC permit holders and fishing additional gear but less than a full set of gear. The shrimp fishery is already in a state of flux with data due to the change in seasons from fall to spring. Additionally changing significantly the individual vessel data by fishing more pots makes the conversion of data more difficult. The shrimp fishery has a lot of latent permits (56%) and allowing stacking could significantly increase effort, completely contradictory to the previous proposal this author submitted to reduce the number of pots by 40-50%.

Proposal #228 – COMMENT

Responses from our survey on Proposal #228 to allow the use of slinky pots for harvesting of shrimp was pretty equal. SEAFa's comment on this proposal is when defining the description of a slinky pot for the shrimp pot fishery you would need to determine if they are considered small or large pots.

Proposal #229 – SUPPORT

SEAFa supports proposal #229 submitted by ADF&G. This is a housekeeping proposal repealing redundant language and putting all descriptions of Southeast Alaska Districts and Sections in one area.

STOCKS OF CONCERN ACTION PLANS

SEAFa is only commenting on the Commercial actions of the Stock of Concern Action plans and staying silent on sport fish and subsistence options.

TAKU AND KING SALMON CHINOOK STOCK OF CONCERN ACTION PLAN

SEAFa supports ACTION #2 – Commercial Fisheries Option B the Dept's recommended option that provides the Dept flexibility to manage the fisheries conservatively to protect necessary Chinook stocks while making it easier to have the action plan align with actions taken yearly at the Pacific Salmon Treaty level.

HUGH SMITH LAKE SOCKEYE SALMON STOCK OF CONCERN ACTION PLAN

SEAFa support ACTION #1 Commercial Fisheries Option A – No prescribed actions
SEAFa supports option A that has no prescriptive actions but allows the Dept to continue to implement the 2003 Stock of Concern Action plan management measures

as appropriate but also allowing for flexibility to further restrict the commercial fisheries or to relax and provide opportunity if the escapement is being met.

NORTHERN SOUTHEAST OUTSIDE CHUM SALMON STOCK OF CONCERN ACTION PLAN

SEAFSA supports ACTION #1 Commercial Fisheries Option A – Status Quo. This option provides the Dept the flexibility to do what they do best and manage the fishery in season conservatively and for sustainability. Specific actions under this would be implemented during statistical weeks 27-34 in the District 113 purse seine fishery and could include time and area restrictions.

ACTION PLAN #4 – CRAWFISH INLET HATCHERY RELEASES

This section of the action plan has 3 sub-options.

SEAFSA SUPPORTS Option #4 – A. This sub-option is the Status Quo for Crawfish Inlet. Under this option, there would be no changes to the permitted hatchery release of chum salmon at Crawfish Inlet. We do not understand the correlation between Crawfish Inlet since it was removed as an index stream and protecting the wild summer chum stocks on Northern Chichagof Island.

SEAFSA OPPOSES Option #4 – B & C. These sub-options would reduce or eliminate the chum releases at Crawfish Inlet. The releases at Crawfish Inlet are a fall chum salmon stock and the concerns of this action plan are summer run chum salmon stocks. We believe that since this is not a Board of Fish decision, but an action for the Commissioner of ADF&G this discussion should be held between ADF&G and industry through the public process at the Regional Planning Team level, delving into the data, and looking for viable options to address the concerns.

Thank you for your service on the Board of Fish and your consideration of our very lengthy comments. If you have any questions about our position or comments we made, or want additional information, please feel free to contact the office at any time or to consult with our representatives at the meeting.

Sincerely,



Kathy Hansen
Executive Director

APPENDIX A



SE POT SHRIMP SURVEY

October 11, 2023

SE Pot Shrimp permit holder, **(42 responses/ out of 228 permits)**

Comments on a question are in italics

Southeast Alaska Fishermen's Alliance (SEAFA) would like to encourage you to fill out and send back the following confidential SE pot shrimp survey. Results will be provided at the next Shrimp task force meeting (early '24) While this is SEAFA's survey, we did consult with ADF&G and have incorporated any questions they were interested in getting more feedback on.

- Did you fish in the spring 2023 pot shrimp fishery ___30___ Yes ___12___ No
 - a. **If NO**, please mark all applicable reasons: ___1___ Participated in another fishery; ___3___ Not available to fish springtime; ___2___ Market conditions; ___1___ Personal reasons ___4___ Other-
*Explain – ordered new pots that never showed up;
 More Lucrative to longline in spring;
 Spring Trolling
 The quality of shrimp in May is inferior to the fall product (chalky meat)*
 - b. Do you plan to fish in the spring in future years ___5___ Yes ___3___ No
 ___1___ Don't Know ___3___ No Answer
 (only No I didn't fish responses collated on this question)
 - c. Please go to the final question about preference of fishing season

If you answered Yes to Question #1

- Was this your first year shrimp fishing as a permit holder? ___2___ Yes ___26___ No
 - a. **If YES**, did you buy the permit because of the change in season ___ ___ Yes
 2 NO
- Do you freeze onboard? ___14___ Yes ___16___ No
- How long have you fished? ___5___ 1-5 years ___4___ 6-10 years ___17___ Over 10 years
 (2 new permit holders both said they had deckhanded for over 10 years)
- Did you shrimp in the same districts & area as you did in previous years?
 ___31___ Yes ___-0-___ No

- Was your market affected by the change in season? 14 Yes 12 No
(One of the permit holders who didn't fish commented that their market was affected)
- Did the distribution of shrimp change by depth and/or location from fall to spring?
26 Yes 4 No
 - a. Depth Changes 15 Yes
 - b. Explain:

-
-
- c. Location: 11 Yes
 - d. Explain: *COMMENTS – yes and no refer to response to whether there was a change in distribution by depth or location.*

- *(NO)Expected shrimp to have relocated, After shallow to deep depths, the best fishing was at same depth*
- *(yes, depth & locations change) shrimp were deeper*
- *(yes) Shrimp were shallower and in lower volume than 3 previous years – Location: some of the main areas had almost no shrimp at all, not likely depth*
- *(yes) same depth – spread out – not as thick as in the fall – we fished the same area as we normally do*
- *(yes) way more spread out*
- *(yes) shrimp were not as deeper depths/location: ½ of the grounds I normally fish, the shrimp were not there*
- *(yes) they are not catchable for whatever reason at any depth -It's the equivalent o trying to gillnet sockeye in November*
- *(yes) scattered no volume – location: shrimp seemed to have moved off the bank in a lot of our normal sets.*
- *There one day – gone the next*
- *(yes) More sporty's and new boats participating in area. Had to move to get gear out.*
- *(yes) they seemed to be coming out of the mud from their molt*
- *The shrimp were in the same spots but thinner. I got the impression they were just creeping out of the mud from molting. There were mostly unegged. But soft. Some very mushy & soft. Location: As last explanation, I caught on hard bottom right on mud edge, deep, coming out of molt.*
- *The shrimping was horrible. In all the same spots I've always done very well. (over 10 year fisherman)*
- *(yes) they were shallower*
- *(yes) Shrimp were in shallower waters. Noticed right away that the normal depths from fall only produced shrimp that were molting and not many. Found all the shrimp were just in shallower.*
- *(Yes) Banding at different depths, not 90% at normal depth, 50-605 at normal levels*
- *Less in normal depths – seemed deeper*

How did the shell and flesh quality compare between fall and spring?

2 Better 13 Comparable 13 Worse

(One person who didn't fish marked that the they felt the quality was worse)

- *Softer shells and flesh*
- *Eggs were too developed – they had eyeballs*

- *No answer – it's better quality in the fall*
- *(from a didn't fish response) wont sell soft chalky shrimp, it is bad for our market*

- How did the market price compare between fall and spring?
 ___7___ Better in fall ___10___ Better in Spring ___9___ Same
- *I have had same market in Japan for 17 years, they prefer eggless shrimp and price is strong (over 30 year permit holder, received feedback from market and considered spring better)*

- Did you quit before the area/season where you were fishing closed because of the way the season was going? ___9___ Yes ___20___ No

- Did you experience more soft-shelled shrimp? ___16___ Yes ___10___ No
 ___1___ Same
- *(same) actually the quality was better*
- *Season should be passed to June 1st*
- *Only in deep water*
 - a. Did this affect value? ___15___ Yes ___15___ No

- Did you receive any feedback from your market about the change of the season?
 ___17___ Yes ___12___ No
 - a. ___10___ Better ___6___ Worse
- *(worse) no shrimp for local residents*
- *(from a fishermen that didn't fish - worse) They are disappointed I won't fish (because of quality)*

- Did you experience increased encounters with sport or personal use fishermen?
 ___10___ Yes ___19___ No

- Are you considering selling your permit in the next couple of years?
 ___11___ Yes ___19___ No Would that change if the season reverted back to a fall fishery?
 ___10___ Yes ___10___ No
- *One marked they would sell their permit if it changed back to fall*
- *(No) I want a fall fishery! But this is my Livelihood! It's total bullshit to have changed season. Some of these questions are vague?? Put it back to fall.*

- **Would you prefer in the future a fall or spring fishing season?**
 ___19___ Fall ___16___ Spring ___7___ **No response or comment**
- *Going whenever they open it*
- *One no response commented Prefers weather in the spring, quality better in fall.*

Of those surveys who did not fish in 2023 the breakdown on the preference for a spring or fall fishery was: 3 Fall 5 Spring 3 No Answer or comment

2 Comments - to early to explain don't know where the shrimp are in the spring & I am not fishing this permit anymore. It is non-transferable. I will leave it to active fishermen to choose when they will fish.

GENERAL COMMENTS

- Leave fishery in spring, better market quality, give it a chance. I would propose a change to start 2 weeks later or June 1st. Shrimp off bite May 15th. Started getting good catch rate 10 days later.
- Only suggestion I'd make is to move the season closer to June, Give Prawns a tad bit more time to insure 100% hard shell and they will become more active. Think I might be the minority when it comes to fleet wanting to fish during spring but quality of product frozen with no eggs is 100X better. Egg melt makes a yucky mess Hopefully interest will wane a tad bit & season will stretch out – make it a better for resource & lil guy
- The weather was a lot nicer – no wind to deal with. You want a small boat fishery.
- Much better market - \$25 lb (answer to market affected by change in season)
- Plan to fish in the spring IF FORCED!
- Just filled out the shrimp survey. I have a couple of comments to add. It was my first year fishing as a permit holder but have been around deckhanding and on shrimp boats for over the past ten years and am familiar with the Fall season. In my personal catch this spring I saw less than a half of a percent had eggs and were hard shelled. Where as in fall season the exact opposite, is apparently mostly all full of eggs. My market was good and didn't affect the price from fall to spring. In discussions with other fishermen on the grounds they are seeing similar catches. Ive heard a lot of older fishermen/women were bitter with the season change just because it affected their normal routine and schedule. A lot of them complaining and fabricating data to the exact questions of this survey. The ageing of the fleet is very apparent in this fishery. I could fish either season but am in favor of keeping it in spring and letting them spawn.
- (from a fishermen that didn't fish) Lingcod season is, and has always been May 16. By choosing May 15 for shrimp, I was eliminated from the shrimp fishery Why didn't they pick a date that doesn't directly conflict with another fishery? Is April 20 or May 1st too much to ask? I feel cheated out of the shrimp fishery! With everything else going on with salmon and blackcod, losing the shrimp fishery has been devastating to me and my family and crew. ADFG should be ashamed of themselves for not taking the timing of the fishery more seriously.
- The 2023 spring fishery was slower for me than previous fall seasons. Quality of shrimp was good, and a spring season is great for dock and local sales. My customers down south also appreciated both the sustainability aspect of a spring fishery and the lack of eggs. I am in favor of continuing the spring season in the hope that it will eventually lead to a larger harvestable population. The two things I would like a shrimp task force to work on, rather than season timing, is increased opportunity through increased surveying and finer toothed management, and decreasing effort through some sort of permit reduction program. Please keep in in the loop on any meetings or other info on the task force.
- Have you ever heard the saying about reinventing the wheel by making it square? Or the doctors oath to (do no harm)? I thought not. Because the covid decision by the board of fish, with the shrug of adf&g on changing the timing of the SE commercial pot shrimp fishery is all of that & worse!
I have participated in the SE pot shrimp fishery for 30 years. The last 13 as a permit holder. This fishery was always stable income, that fit into my program of 4-6 other fisheries, all in SE. I derived 15-20 percent of my yearly income from this fishery.
That is all in disarray & gone, because of a decision I & no one I know had any idea was on the table! I was physically out halibut fishing when this happened. Doing my job! Before I get the stone of being uninvolved in fishery politics thrown at me..... I do belong to two different fishing organizations, and have for a

number of years. I'm also known to the the salmon & shellfish managers in Juneau & Petersburg. As well as speaking to managers in Sitka & Haines when I've felt the need. I'm not shy, uninformed, or hard to get ahold of. Let's not forget all the time & venue changes prior to this actual BOF boondoggle! Why were us permit holders not asked if we wanted to change?

My understanding is this change came at the request of a small number of people in Sitka? Were they permit holders? Did the fleet (majority of other permit holders agree? (No & No!) Let me list the reasons that I'm aware of for taking a profitable fishery that was successfully managed for 40-50 years (more?) and turning it on its head.

- (1) Canada fishes in spring
- (2) wont catch spawners (shrimp with eggs)
- (3) get paid more (no eggs) Better quality
- (4) a handful of folks thought summer would be nice

My answer to above after just finishing first summer season.....

- (1) who cares when Canada fishes? They're track record on fisheries is nothing I want to emulate! Also they catch way more shrimp than us. Why do we want to go head to head with a more dominate player in the market? We had our nitch & markets developed over many years. All in disarray now. PWS also fishes in spring....our resource is much healthier. So why do we want to follow they're lead?
- (2) well, I caught shrimp that still had remnants of eggs. As far as saving females....that's insane. A dead female is a dead female. Wether it's egged or not. Ridiculous argument. In fact we will kill more females to reach quota since there's no egg weight. My personal observations & fears is were pounding on the best spawners in May as the come out spawn/molt first.
- (3) I call BS on quality & getting paid more. I'm sure someone got "more". But it wasn't me, or the folks I know. I had a percentage of soft/mushy shrimp. As stated above, some had a bit of eggs. And I'm getting paid exactly the same as two years ago!
- (4) I worked & bought into the spot shrimp fishery because it fit my program.

I was able to get excellent/experienced crew because the October fishery fit they're program. That's all gone to hell. My regular crew are boat owners that have other fisheries going in May. May has "always been my month for major boat/home projects in the good weather. Where quotas are still going guys are missing memorial weekend with they're families. Got kids or grandkids? Wanna miss they're graduations? Me neither. But, I've got to support myself & them. These things are personal. But is why most of us bought into an October fishery. The days of being a dumb fisherman & fishing when "you" want are long dead. It's all about business plans. Sharp pencils & an unwillingness to fail. We need predictability. I do not fly by the seat of my pants. My crew, markets, plans are made a year in advance most times. I cannot stress enough, what a disaster this arbitrary decision has made of my business plan. That's been 30 years in the making for the pot shrimp fishery. Thrown on its head for what?

The following are the reasons that I & the permit holders that I know think this decision needs to be turned around, with the SE Pot Shrimp Fishery going back to an October First start

- (1) safety of the resource
There are decades of history of a fall fishery. (None for spring)
My catch rate was about half of fall fishery. I felt like I wasn't doing the biomass any favors
- (2) traditional timing. The fall fits my program. The catch rate is double.
The shrimp are hard & healthy. My markets are there. It's a time period we permit holders bought into for a reason.
- (3) there is very little conflict in October with sport & subsistence fishermen.
Let them & other summer users do they're thing. It all works better if we fish after them.
- (4) there's a regulation conflict between pot fishing for shrimp after June first & participating in the Dungeness crab fishery. Which is ridiculous, but problematic.
- (5) I know it's personal.....but I really don't want to loose another holiday.

(Besides upsetting a bunch of sportsmen) And I don't want to have to choose between making a living & attending my grandkids & friends graduations, weddings, etc.

(6) I lost my entire shrimp income in 2022 because of this arbitrary change.

No one thought of that in the rush to push this covid era agenda! For you regular job holders.....that's about 2 months pay! Stop & think about that for a minute. Oops. I think that would be a pretty big deal if it were done to someone on a salary. But were supposed to shut up & buckup! I got to fish this year.....worst year I've had in my 30 years. I caught about half of normal. So there goes a months pay this year! Seems like pretty brutal price to pay for an experiment that I wasn't made hip to. Or asked my opinion about?

In closing.....you don't have to take my word on this. Let's poll the permit holders. That's who needs to decide if we need this uncalled for regime shift.

If 51% percent think this is great, and I'm in the minority. Great! I'll go away. Sell out whatever. But if I'm right.....we need to change this fishery back to October. Right now. It can be achieved by October 2024 if we hop to it.

This was a bad decision. The only thing worse is not correcting it!



January 13, 2025

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Madam Chair and members of the Board,

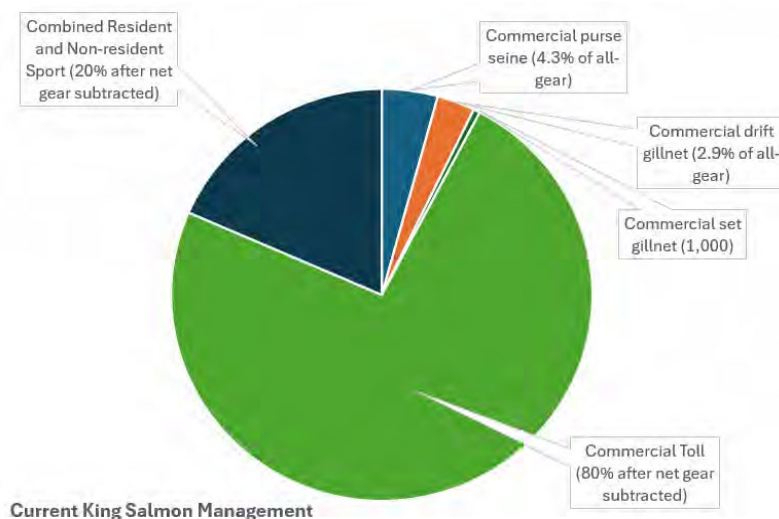
Southeast Alaska Guides Organization (SEAGO) represents Southeast Alaska’s 300+ charter fishing operations. Guided saltwater trips in Southeast make up roughly half the State’s charter fishing activity. Southeast charter anglers brought an estimated \$202 million outside dollars into the Southeast economy in 2024, supporting 1,750 jobs and \$11 million in local tax revenue.¹ This revenue-intense industry benefits Alaskans as a primary driver of local transportation, supply, service, and accommodation businesses.

We’re a powerful economic engine that runs on a small amount of the state’s marine resources. Our non-resident customers face increasing restrictions on halibut, pelagic and non-pelagic rockfish, and lingcod, making it more difficult to attract and keep business. We ask the board to help us protect opportunity in the fisheries that are important to our industry.

We support proposals: 108, 113, 122, 123, 159, 206-208, 211, 230, 231

We oppose proposals: 104, 106, 107, 109-111, 114-120, 124-128, 130, 140, 141, 156, 160-163, 164, 203, 205, 209, 210

Comments on King Salmon Management



¹ McKinley Research Group (January 2025) *The Economic Contribution of the Southeast Alaska Sport Fishing Industry*

King salmon are foundational to the Southeast Alaska sport fishery for both residents and non-residents. Proposals that rearrange where fish are used in the season or reduce opportunity for sport harvest below historical use unnecessarily jeopardize the sport industry.

There are multiple king salmon proposals calling to manage the sport fishery to an annual 20% hard cap. To date, the Board has managed the sport fishery to a soft or “average” 20% allocation across time, allowing harvest of more than 20% in low abundance. The sport fishery historically doesn’t harvest its 20% in high abundance. Proposals that call for 20% in-season management don’t allow the flexibility needed in the sport fishery to provide enough fish in seasons of low abundance for both residents and non-residents.

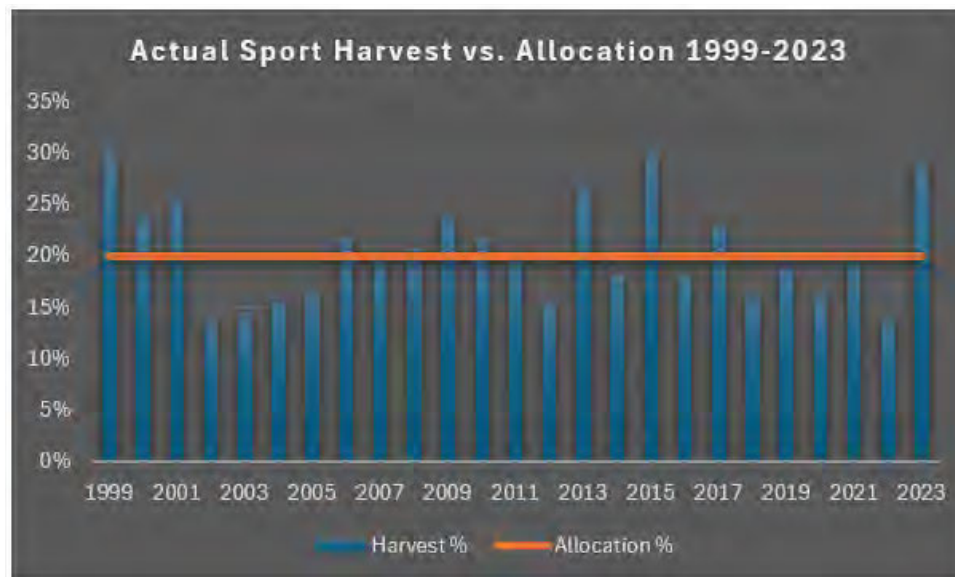


Figure 1

(Data provided by ADFG. Sport harvest range = 13.5%-29.9% for the period)

If the Board elects to hold the sport fishery to a hard inseason percentage, it will need to be more than 20% to provide adequate and historical harvest opportunity for both residents and non-residents in low abundance years.

Several proposals limit non-residents to one or two king salmon per year during May and June. Kings are the only salmon and one of the few sport fish available through mid-July. Southeast is a destinational sport fishery where guided anglers often come for three-plus days based on the potential to harvest fish daily. Dropping below a three-fish annual king limit before alternative salmon species arrive makes multi-day trips unattractive and unmarketable.

When the Board began implementing different limits for residents and non-residents to safeguard resident access to king salmon, it also began prioritizing early season harvest for non-residents, preserving a three-fish annual limit through June 30th, then tapering annual limits as the season progressed. This structure is crucial to keeping guided sport businesses booked the first half of the season.

Multiple proposals speak to prioritizing resident access to king salmon. SEAGO strongly supports resident sport priority to provide both recreational and food opportunities.

Comments on Groundfish

Halibut remain the primary bottom fish target, but with increasing size restrictions on guided anglers, rockfish and lingcod have become more important to the non-resident sport fishery. Sport rockfish limits for non-residents have decreased from 10 per day per angler to a proposed 3 per day, with no retention of Demersal Shelf Rockfish (DSR) (e.g., Quillback, Copper, China, and Yelloweye). Lingcod, which were previously 2 per day with no annual limit for non-residents, are now 1 per year with a size restriction of 30"-35" in most ports.

We support proposals calling to liberalize non-pelagic rockfish limits. From observations of sport operators, there is no problem with non-pelagic rockfish populations. Shallow water habitat is flush with every variety of DSR, including Yelloweye.

We support a reopening of DSR for nonresidents. DSR stock assessments for Southeast were driven down primarily by surveys on the Fairweather Grounds, an area inaccessible to the sport fishery. Nearshore surveys are also conducted around the 100 fathom curve where commercial fishing continues to harvest DSR (with the ability to sell it). Lower densities where commercial fishing occurs are extrapolated into shallow habitats making the assessment underestimate abundance.

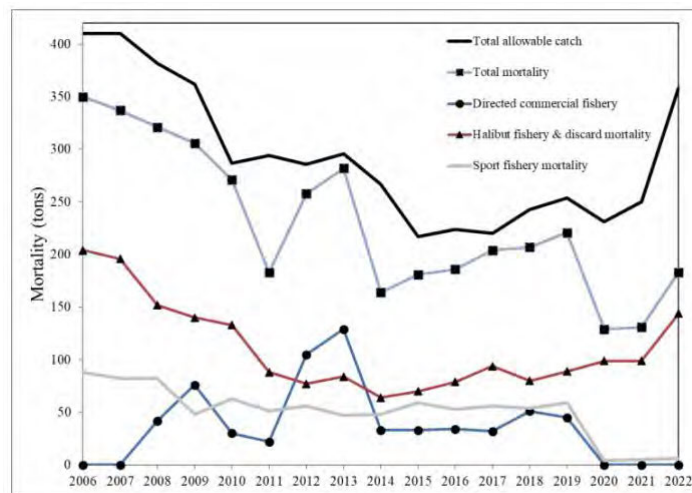


Figure 4.—Total allowable catch (TAC) and mortality by fishery and year of demersal shelf rockfish in the Southeast Outside Subdistrict of Southeast Alaska, 2006–2022.

This figure shows total allowable catch for DSR increasing and the commercial halibut fishery as the sole driver of increased mortality (primarily Yelloweye by weight), while the sport fishery remains closed to DSR retention.

Comments on Proposal 156, Restricted Egg Take for Southeast Hatcheries

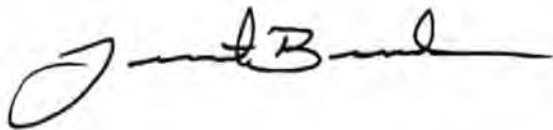
Proposal 156 raises concerns about hatchery production of pink and chum salmon affecting the ocean's carrying capacity for other salmon species. While there may be a link, the science is inconclusive, and a report due within the year will provide more clarity. Acting before this research is completed would be premature.

Hatcheries in Southeast Alaska produce salmon that support both commercial and sport fisheries. Annually, they release 10 million Chinook, including 2.5 million specifically for sport fishing. These fish enhance harvest opportunities for residents and visitors, with hatchery Chinook accounting for up to 50% of the harvest near Juneau and 30% near Ketchikan. This production alleviates pressure on wild stocks of concern, aiding ongoing efforts to rebuild these populations.

We urge the Board to wait for the upcoming ADF&G report on straying and hatchery impacts on wild stocks before making a decision. A cautious, science-based approach is essential to balance ecological concerns with the economic and social well-being of Southeast Alaska's communities.

Respectfully,

Forrest Braden
Executive Director
forrest@seagoalaska.org



Kim Landeen
Assistant Executive Director
kim@seagoalska.org





The Southeast Alaska Seiners Association (SEAS) would like to make the following comments regarding ADF&G's report to the Board of Fisheries entitled **Northern Southeast Outside Chum Salmon Stock Status and Action Plan, 2025.**

SEAS encourages the Board of Fisheries and ADF&G to **adopt Action Plan #1 Option A.** This alternative allows ADF&G to manage the commercial fisheries in the area that affects the NSEO chums under their time and area authority. Specific actions would depend on in season assessments of run strengths of the summer chum and pink salmon in NSEO.

Action Plans #2 and #3 deal with subsistence and sport fisheries. In the report ADF&G has stated that subsistence and sport fisheries have little, if any, impact on these stocks. SEAS agrees there should be no action taken on these fisheries.

Action Plan #4. Under Action Plan #4 ADF&G has listed 3 options.

Option A

SEAS Supports Option A under the Plan. Option A is the status quo for Crawfish Inlet. Under Option A there would be no changes to the permitted hatchery release of chum salmon from Crawfish Inlet. ADF&G has introduced no data to suggest that Crawfish Inlet releases and returning adults have any effect on the chum salmon in the northern Chichagof Island, which are the summer chum stocks ADF&G has concerns with.

Option B.

SEAS opposes Option B. This Option would reduce chum salmon releases and production at Crawfish Inlet. Again, ADF&G has not produced any data to suggest these releases are affecting the potential stocks of concern in northern Chichagof Island. It should also be noted that Crawfish Inlet is approximately 60 miles from the chum salmon streams on Northern Chichagof Island and have different run timing, NSEO being summer chum and Crawfish Inlet being a fall stock.

Option C.

SEAS opposes Option C. This Option would eliminate chum salmon releases in Crawfish Inlet. As stated in the Report there are several detrimental effects that would happen under Option C. Once again, ADF&G has introduced no data to suggest that Crawfish Inlet releases and returning adults have any effect on the chum salmon in the northern Chichagof Island.

SEAS would suggest that the industry (purse seine fishermen and NSRAA), work with ADF&G to do a deeper dive into available data, both escapement numbers and methods and harvest information, and if

possible, look at viable options to protect those stocks, assuming there may be viable options. The purse seiners and Hatchery operators look forward to working with ADF&G on these potential stocks of concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Doherty". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Phil Doherty
Executive Director – SEAS
PO Box 6238
Ketchikan, AK 99901



The Southeast Alaska Purse Seiners Association (SEAS) submits the following comments on the 2024/2025 Board of Fisheries Southeast Alaska Proposals 157, 158, 167, and 168.

PROPOSAL 157

5 AAC 33.3XX. New Section.

Establish a terminal harvest area and associated management plan for harvesting hatchery produced salmon at Burnett Inlet.

Proposal 157 is submitted by the Southern Southeast Regional Aquaculture Association (SSRAA).

SEAS **supports** this proposal. SSRAA typically takes all chum salmon returning to Burnett Inlet for broodstock and cost recovery, however there are years when there are chum salmon in excess to broodstock and cost recovery needs. Establishing a THA in regulation for this situation allows for harvest of excess fish.

PROPOSAL 158

5 AAC 33.374 District 12: Hidden Falls Hatchery Terminal Harvest Area Salmon Management Plan. and 5 AAC 40.042. Northern Southeast Regional Aquaculture Association Special Harves Areas.

SEAS **supports** this proposal. This proposal clarifies the fishing boundaries of the Hidden Falls Terminal Harvest Area but does not significantly change the open fishing area.

PROPOSAL 167

5 AAC 33.332. Seine specifications and operations.
Increase the legal length of purse seine by 50 fathoms.

SEAS **opposes** this proposal. SEAS believes the current purse seine regulation of 250 fathoms in length is sufficient to harvest salmon during fishing periods.

An additional 50 fathoms to the length of a purse seine would further complicate the fishery management under the Pacific Salmon Treaty, particularly in the District 104 seine fishery.

PROPOSAL 168

5 AAC 33.398. Use of aircraft unlawful.
Modify regulations to make it unlawful to use aircraft for locating salmon during any open commercial purse seine fishing period.

SEAS is **neutral** on this proposal.

Sincerely,



Phil Doherty
Executive Director – SEAS
PO Box 6238
Ketchikan, AK 99901



The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to Proposal 156 which would reduce SE AK hatchery production by 25%.

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve a fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery and a robust and healthy hatchery program that is designed to minimize wild stock interactions and enhance fisheries.

- The Private Non-profit hatchery programs are stakeholder driven and overseen by fishermen who strongly support Alaska's mandate to protect wild stocks.
- In SE AK, hatchery genetic policies prioritize using local broodstock to maintain genetic diversity within wild salmon populations, meaning hatcheries primarily collect eggs from fish originating in nearby streams to minimize genetic impacts on wild stocks when hatchery fish stray back to spawn; this is done to protect the integrity of wild populations and is a key component of the Alaska Department of Fish and Game's (ADF&G) broader genetic policy for salmon hatcheries.
- The highest priority of the Alaska hatchery programs is to protect and maintain wild stocks. All common property fisheries in SE AK are targeted on wild stocks. Hatchery produced salmon are caught incidentally during those common property fisheries. The only targeted fisheries for hatchery salmon are conducted in the Terminal Harvest Area.
- In SE AK there is an allocation plan in place for the distribution of hatchery fish (5AAC 33.364). The troll fishery is below their allocation, the gillnet fishery is above their allocation, and the seine fishery is within their allocation. The allocation regulation is based on historical hatchery production. If there are significant changes to hatchery production the Board of Fish will have to re-exam the allocation plan.
- Colonization (or straying) is a natural part of the salmon life cycle, so hatcheries are required to use locally adapted stocks from nearby rivers and streams to maintain the natural genetic mixing of salmon populations within an area.
- There is some "straying" in wild stock salmon. Is the rate of "straying" in hatchery produced salmon any different than in wild stocks?

- Reduction of hatchery produced salmon would put extra pressure on wild stocks. ADF&G salmon managers would have to deal with more boats fishing in common property fisheries as those boats may not have the options of fishing in Terminal Harvest Areas during common property fisheries.
- Alaska's salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations.
- Reducing hatchery production by 25% would have negative economic consequences for all user groups, processors, and communities in SE AK. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact numerous SE AK charter operations and lodges.
- Cutting production of pink and chum salmon would significantly reduce these revenue streams making it difficult, if not impossible, to meet State of Alaska Fisheries Enhancement Revolving Loan Program repayment obligations.
- Reduced production would be a financial burden on hatchery operation. Hatcheries may be forced to eliminate more expensive programs that produce chinook, coho, and sockeye salmon.
- There is no evidence that these significant reductions will do anything to address unknown wild salmon interaction concerns addressed by the proposer of 156.
- The Southeast Alaska Chinook Salmon Fishery Mitigation Program was initially established in 2009 as part of the Pacific Salmon Treaty negotiations and was designed to alleviate economic impacts resulting from a 15% reduction in Chinook salmon harvest levels under the 2009 revision to the Treaty. This program continues to be necessary due to an additional 7.5% reduction in Chinook harvest levels under the 2019 revision of the Treaty.

Sincerely,



Phil Doherty
Executive Director – SEAS
PO Box 6238
Ketchikan, AK 99901



The Southeast Alaska Purse Seine Association (SEAS) opposes Proposal 134 for the following reasons.

PROPOSAL 134

5 AAC 33.392. Size limits and landing of king salmon.

Expand landing and retention requirements for king salmon by purse seine permit holders and establish penalties for violating landing requirements.

Proposal 134 states the following: *The seine vessel or SE Alaska purse seine permit holder cannot participate in a future SE Alaska purse seine salmon fishery for the statistical year unless subsection (B) is complied with. Violation of subsection (A) is punishable as a violation with a set fine on the Alaska Court Bail schedule of \$150 plus restitution of \$150 for each king salmon.*

The Alaska Board of Fisheries does not have the authority to impose fines and punishment when developing and potentially passing regulations. Therefore Proposal 134 cannot pass as written.

Non-retention of chinook salmon is directly addressed in ADF&G purse seine fishery announcements:

When under non-retention of Chinook salmon 28 inches or larger, purse seine fishermen are encouraged to quickly release Chinook salmon in a manner that minimizes mortality. If Chinook salmon greater than 28 inches (large) are retained, the fisherman is in violation and may be issued a citation. Retained large Chinook salmon will be donated, and the fisherman may be subject to the cost associated with processing the fish for donation. On the fish ticket, the number and weight of the fish must be recorded and the disposition code "86-Donated" must be used.

SEAS is in complete agreement with this statement. SEAS fully encourages SE AK purse seine permit holders to release large chinook salmon as quickly as possible during periods of non-retention.

According to Proposal 134: *Purse seiners do not specifically target a certain species of fish.*

The Southeast Alaska purse seine fishery targets and is managed for pink salmon. In most years at least 90% of the purse seine harvest is pink salmon (excluding Terminal Harvest Areas and Metlakatla).

Total Common Property Purse Seine Harvest (excluding Terminal Harvest Areas and Metlakatla)
1985 – 2024 ADF&G data

chinook	sockeye	coho	pink	chum
367,971	27,483,444	13,020,461	1,421,469,673	89,737,907
0.024%	1.771%	0.839%	91.585%	5.782%

ADF&G manages the purse seine fishery by its time and area authority on the abundance of wild stock pink salmon with very few exceptions.

Under current State of Alaska regulations, the SE AK purse seine fleet is allocated a portion of the allowable harvest of Chinook under the Pacific Salmon Treaty.

5 AAC 29.060. Allocation of king salmon in the Southeastern Alaska-Yakutat Area

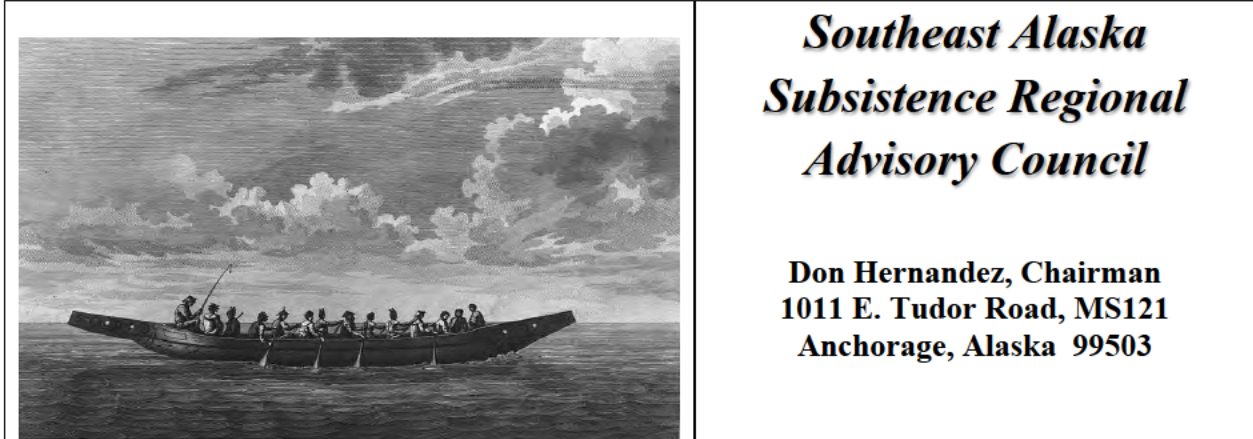
The SE AK purse seine fishery is allocated 4.3% of the region's harvest of chinook salmon.

Therefore, SEAS opposes this proposal.

Sincerely,



Phil Doherty
Executive Director – SEAS
PO Box 6238
Ketchikan, AK 99901



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

In Reply Refer To:
OSM.24074

December 18 2024

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

ALSO VIA ONLINE PORTAL: <https://boardoffisheries.adfg.alaska.gov/>

**RE: COMMENTS ON THE 2024–2025 ALASKA BOARD OF FISHERIES PROPOSALS
FOR SOUTHEAST AND YAKUTAT FINFISH AND SHELLFISH**

To the Board of Fisheries:

I am writing to you on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council). The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Southeast Alaska and was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Some of the Council's duties include reviewing and evaluating regulations, policies, management plans, and other matters that may impact subsistence resources critical to the southeast Alaska communities it serves.

During its last meeting (October, 2024), the Council reviewed and discussed several Alaska Board of Fisheries (BOF) proposals and then formulated comments on a total of 23 proposals. It is encouraging to see that, within the guidance contained in the Southeast/Yakutat Finfish and Shellfish Proposal Book, the BOF is specifically welcoming traditional knowledge in public comments:

“The Board endeavors to incorporate traditional knowledge by seeking and inviting traditional knowledge holders recognized by their community, tribe, or by an organization whose interests encompass the conservation, protection, restoration, or

enhancement of fishery resources, to share their experiences, values, alternative and/or independent observations and data collections directly with the Board.”

Though this Council does not offer a ‘Traditional Knowledge report’ to BOF, it does submit the following comments, which incorporate traditional ecological knowledge and the experiences of Southeast rural residents.

For your consideration:

King Salmon Proposals:

Proposal 104: The Council **SUPPORTS** this proposal to allocate 5,000 King Salmon for Alaska’s all gear quota to a King Salmon subsistence fishery and establish provisions for King Salmon subsistence fishery. The **Council submitted this proposal**, which covers many aspects of the King Salmon Management Plan (Plan), including in-season management, which is of particular interest to the Council for the purposes of keeping the guided sportfish within their allocation. The Council recognizes the difficulty in adding an apparently new category of King Salmon allocation amid a contentious debate over an already fully allocated resource. However, King Salmon have been used for subsistence purposes for millennia, as described in *Haa Atxaayí Haa Kusteeyix Sitee* (Our Food Is Our Tlingit Way of Life), by an elder, John C. Jackson, who relayed an account of a discussion with his grandfather about the use of a bone gorge to catch king salmon:

“The bone was called *nóot'aa* and was about four or five inches long sharp on both ends, and the diameter was just enough to hold without wrestling with it but strong enough to realize that it will break. To the middle of it was tied this leather. This is used for catching king salmon.”

The subsistence use of King Salmon throughout Southeast Alaska communities is well-documented in household survey data collected by Alaska Department of Fish and Game (ADF&G) Division of Subsistence. From the earliest surveys conducted in the 1980s to the most recent ones conducted, a majority of households have reported the consistent use of King Salmon. For example, 73% of Hoonah households reported using King Salmon in 1996, 70% in 2012, and 82% in 2016. However, over that same period of time, the sources of King Salmon have shifted. In 1996, 21% of Hoonah households used King Salmon retained from commercial fisheries, but in 2016 that number was only 1.5%, with the other 80% coming from rod and reel harvest. This shift reflects the loss of limited entry permits and their associated harvesting opportunities from many Southeast Alaska communities. Along with that shift has come an increasing dependence on rod and reel harvest of King Salmon under sport fishing regulations. Despite the harvest occurring under sport fishing regulations, that rod and reel harvest essentially functions as a subsistence practice.

That dependence on rod and reel harvest for traditional household use of King Salmon is now being threatened by allocation battles stemming from a growing non-resident charter industry. The Council recognizes the difficulty in allocating a scarce resource amongst competing users. However, residents of Southeast Alaska communities that have depended on King Salmon for

generations should not be caught in the middle of an allocation battle between the commercial troll and guided angler industries.

The Council encourages the BOF to consider its suggestions to modify the Plan to provide for a subsistence King Salmon fishery. It understands that the BOF has to balance many competing interests on this issue. As the BOF develops the Plan, the Council stands prepared to work with the BOF and others to incorporate the long-existing subsistence King Salmon fishery into the new management framework.

Further, the Council encourages the use of in-season management as needed to keep various user groups within their respective allocations. In-season management is regarded as an essential tool for management.

Proposal 118: The Council **SUPPORTS** this proposal setting the nonresident annual limit for King Salmon to not exceed three and nonresident annual limits will not apply in terminal harvest areas. The Council believes that this proposal would encourage charter operators to target King Salmon in terminal harvest areas thus shifting effort away from fisheries that count towards the allocated King Salmon fisheries. The nonresident annual limit for King Salmon addresses both the nonresident charter harvest and nonresident unguided harvest.

Personal Use/Sport/Subsistence Proposals:

Proposal 135: The Council **SUPPORTS** this proposal that would only allow for the use of seine gear in the Redoubt Bay subsistence fishery when the escapement is projected to be greater than 40,000 Sockeye Salmon. **The Council submitted this proposal.** This proposal only impacts the top tier of the Redoubt Management Plan, which is enacted when projected escapement is 40,000 Sockeye Salmon. This escapement is substantially over the current upper escapement goal for this system (25,000 Sockeye Salmon), which indicates the level at which the system is experiencing declining productivity with increased escapement. As such, the Council supports the inclusion of seine gear in the subsistence fishery closer to the Redoubt Falls area which would provide for a more efficient and orderly fishery. It would allow subsistence users to more quickly acquire their daily Sockeye Salmon limit by reducing spatial and temporal overlap among subsistence fishermen. The 2024 weir count for Sockeye Salmon escapement (210,253) was more than four times the upper escapement goal for this system, which indicates a large harvestable surplus despite the largest commercial Sockeye Salmon fishery at Redoubt in decades. Therefore, this proposal is unlikely to have any substantial impact on the resource. This gear type can also be enacted with in-season management when projected escapement exceeds 40,000 Sockeye Salmon.

Proposal 136: The Council **SUPPORTS** this proposal that would increase Sockeye Salmon possession and annual limits at Basket Bay (from 15/30 to 20/40). **The Council submitted this proposal.** This system is a long distance from rural communities, and fuel cost and risk greatly increase with distance from a community. As such, the Council supports an increase in the possession and annual limit for this system.

Proposal 137: The Council **SUPPORTS** this proposal that would increase the possession limit of Sockeye Salmon for Basket Bay from 15 to 30 sockeye salmon. This system is a long distance from rural communities, and fuel cost and risk greatly increase with distance from a community. As such, the Council supports an increase in the possession for this system, which would allow subsistence users to collect their annual limit in one trip rather than needing to make two trips to this system.

Proposal 143: The Council **SUPPORTS** this proposal that would increase the bag and possession limit for trout in Southeast Alaska. The Council would like to acknowledge that federally qualified subsistence users, those Alaskans who reside in Southeast Alaska and Yakutat Fishery Management Areas, can already harvest more liberally under a Federal fishing permit than this proposal offers. Subsistence users may harvest 6 Cutthroat or Rainbow Trout in combination, daily, per household, and the household possession limit of 12 from the freshwaters within the Tongass National Forest.

Proposal 144: The Council **SUPPORTS** this proposal that would increase harvest opportunity for trout in Southeast Alaska. The Council would like to acknowledge that federally qualified subsistence users, those Alaskans who reside in Southeast Alaska and Yakutat Fishery Management Areas, can already harvest more liberally under a Federal fishing permit than this proposal offers. Subsistence users may harvest 6 Cutthroat or Rainbow Trout in combination, daily, per household, and the household possession limit of 12 from the freshwaters within the Tongass National Forest.

Proposal 145: The Council **SUPPORTS** this proposal that would increase harvest opportunity for trout in Klawock Lake drainage on Prince of Wales Island (POW). The Council would like to acknowledge that federally qualified subsistence users, those Alaskans who reside in Southeast Alaska and Yakutat Fishery Management Areas, can already harvest more liberally under a Federal fishing permit than this proposal offers. Subsistence users may harvest 6 Cutthroat or Rainbow Trout in combination, daily, per household, and the household possession limit of 12 from the freshwaters within the Tongass National Forest.

Proposal 146: The Council **SUPPORTS** this proposal that would increase the bag and possession limit for Rainbow and Cutthroat Trout in 108 Creek drainage (POW). The Council would like to acknowledge that federally qualified subsistence users, those Alaskans who reside in Southeast Alaska and Yakutat Fishery Management Areas, can already harvest more liberally under a Federal fishing permit than this proposal offers. Subsistence users may harvest 6 Cutthroat or Rainbow Trout in combination, daily, per household, and the household possession limit of 12 from the freshwaters within the Tongass National Forest.

Proposal 147: The Council **SUPPORTS** this proposal that would increase the bag and possession limit for Rainbow and Cutthroat Trout and prohibit the use of bait in Neck Lake (POW). The Council would like to acknowledge that federally qualified subsistence users, those Alaskans who reside in Southeast Alaska and Yakutat Fishery Management Areas, can already harvest more liberally than this proposal offers under a Federal fishing permit. Subsistence users may harvest 6 Cutthroat or Rainbow Trout in combination, daily, per household, and the household possession limit of 12 from the freshwaters within the Tongass National Forest.

Proposal 148: The Council **SUPPORTS** this proposal that would modify the Eagle Lake (near Petersburg/Wrangell) Cutthroat Trout bag and possession and size limit. The Council would like to acknowledge that federally qualified subsistence users, those Alaskans who reside in Southeast Alaska and Yakutat Fishery Management Areas, can already harvest more liberally than this proposal offers under a Federal fishing permit. Subsistence users may harvest 6 Cutthroat or Rainbow Trout in combination, daily, per household, and the household possession limit of 12 from the freshwaters within the Tongass National Forest.

Sitka Herring Proposals:

Proposal 178: The Council **OPPOSES** this proposal that would expand waters closed to commercial sac roe herring fishery to include the majority of waters in which herring having historically spawned and in which the fishery has historically occurred. The Council is in support of conserving existing areas that are closed to commercial harvest of herring in Sitka Sound, but does not support the increase in that conservation area, recognizing the drastic restrictions that this would cause to the commercial fishery.

All Commercial Herring Proposals:

Proposal 190: The Council **SUPPORTS** this proposal to provide for co-management of herring fisheries with tribal governments. The Council advocates this request for co-management to be developed through a stakeholder meeting process and not just with one entity.

Commercial, Subsistence, Sport, Personal Use Groundfish Proposals:

Proposal 203: The Council **OPPOSES** this proposal that would establish unguided nonresident lingcod regulations. The Council would like to establish unguided nonresident lingcod regulations that match the regulations for guided anglers. This proposal moves in the opposite direction. The Council has identified current concerns over the undocumented harvest by unguided anglers in sport fisheries throughout Southeast Alaska and Yakutat. This proposal would only further exacerbate their concerns for the impact that unguided anglers may have on subsistence resources. Until these concerns are addressed, the Council does not support any increased harvest through the inclusion of nonresidents in this fishery.

Proposal 206: The Council **SUPPORTS** this proposal that would reopen the yelloweye sport fishery for residents. The Council believes this proposal will provide additional opportunities for Alaska residents and have a negligible impact to the resource.

Proposal 207: The Council **OPPOSES** this proposal that would allow retention of demersal shelf rockfish by nonresidents. The Council is concerned over the conservation of these species and does not want to see increased harvest through the inclusion of nonresidents in this fishery. The Council has identified current concerns over the undocumented harvest by unguided anglers in sport fisheries throughout Southeast Alaska and Yakutat. This proposal would only further exacerbate their concerns for the impact that unguided anglers may have on subsistence resources.

Proposal 208: The Council **OPPOSES** this proposal to allow retention of demersal shelf rockfish by nonresidents. The Council is concerned over the conservation of these species and does not want to see increased harvest through the inclusion of nonresidents in this fishery. The Council has identified current concerns over the undocumented harvest by unguided anglers in sport fisheries throughout Southeast Alaska and Yakutat. This proposal would only further exacerbate their concerns for the impact that unguided anglers may have on subsistence resources.

Proposal 209: The Council **SUPPORTS** this proposal to establish provisions for a resident priority within Emergency Order authority for pelagic rockfish. The Council advocates for the provision of a meaningful preference for Alaska residents over nonresident anglers. This proposal provides for in-season management opportunities that would allow for deliberate reactions to harvest amount and conservation concerns that arise within the season but continue to provide full harvest opportunities for Alaska residents.

Proposal 210: The Council **OPPOSES** this proposal to reduce the bag and possession limit for pelagic rockfish in Southeast Alaska. If the Department is concerned over the conservation of these species, the Council does not want to see increased harvest through the inclusion of nonresidents in this fishery. The Council has identified current concerns over the undocumented harvest by unguided anglers in sport fisheries throughout Southeast Alaska and Yakutat. The Council was informed that in the past, the department has reduced bag limits for both non-residents and non-residents by Emergency Order in the last several years which reduced the bag limits less for residents than non-residents; however, it did lower the resident limit from five a day to four a day. This proposal would only further exacerbate the Council's concerns about the unguided angler impacts to the resource since it reduces the bag limits on pelagic rockfish for both residents and non-residents.

Subsistence Shellfish, Commercial and Sport Shrimp, Commercial and Sport Other Miscellaneous Shellfish:

Proposal 222: The Council **SUPPORTS** this proposal to adopt seasonal closures for subsistence, sport, and personal use shrimp fisheries (during spawn). The Council has heard concerns from subsistence users about some areas of overharvest in the shrimp fishery. The Council supports sustainable management of subsistence resources and believes that this closure to shrimp harvest is a biologically sound management decision that will increase the reproductive success of shrimp stocks. The Council views these restrictions to subsistence users as having minimal impact to subsistence harvest, while improving the sustainability of this fishery.

Commercial and Sport Crab:

Proposals 250: The Council **OPPOSES** this proposal to reduce the minimum size limit for male Dungeness crab from six and one-half inches to six and one-quarter inches in the Registration A subsistence and personal use fisheries. The Council advocates for the sustainable management of subsistence resources and believes that the current size restrictions to Dungeness

crab harvest are biologically sound benchmarks for reproductive success, which aid in maintaining a sustainable fishery.

Proposals 258: The Council **OPPOSES** this proposal to open some or all areas closed to commercial Dungeness crab fishing in Registration Area A. The Council is against opening subsistence and personal use crab areas to commercial harvest. Commercial harvest of Dungeness crab drastically reduces local crab availability for subsistence users. There is currently inadequate stock assessment for the crab fisheries in Southeast Alaska and catch per unit effort (CPUE) has been declining in the crab fishery. Opening additional commercial fisheries without additional, localized data would reflect irresponsible management of this resource and create undue competition with subsistence users.

Proposals 259: The Council **OPPOSES** this proposal to open all waters closed to commercial Dungeness crab fishing in Registration Area A between October 1 and November 30, annually. The Council is against opening subsistence and personal use crab areas to commercial harvest. Commercial harvest of Dungeness crab drastically reduces local crab availability for subsistence users. There is currently inadequate stock assessment for the crab fisheries in Southeast Alaska and CPUE has been declining in the crab fishery. Opening additional commercial fisheries without additional, localized data would reflect irresponsible management of this resource and create undue competition with subsistence users.

The Council appreciates the opportunity to convey its support and concerns about the effect of these proposals. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-209-7817, dlperry@usda.gov.

Sincerely,



Donald Hernandez,
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council Members
Scott Ayers, Acting Director, Office of Subsistence Management
Cory Graham, Acting Fisheries Division Supervisor, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record

SOUTHEAST CONFERENCE

RESOLUTION 25-04**A RESOLUTION OF THE SOUTHEAST CONFERENCE OPPOSING PROPOSAL 156 TO BE CONSIDERED AT THE JANUARY 28 - FEBRUARY 9, 2025, ALASKA BOARD OF FISHERIES MEETING**

WHEREAS, Southeast Alaska's salmon hatchery programs have successfully operated for almost 50 years, supplementing wild salmon harvests and supporting commercial, sport, subsistence, and personal use fisheries across the state, which are vital to communities in Southeast Alaska; and

WHEREAS, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery-supported ecosystem in Southeast Alaska and threatening the stability of salmon resources on which coastal communities in Southeast Alaska depend; and

WHEREAS, a reduction in hatchery production would not only diminish the availability of salmon for commercial but would also limit access to salmon for subsistence, personal use and sport fishers, thereby directly impacting food security, cultural practices, and recreational opportunities in communities in Southeast Alaska; and

WHEREAS, Alaska's salmon hatchery program is responsible for supporting approximately 4,200 jobs, \$219 million in labor income, and \$576 million in economic output annually, benefiting over 14,000 Alaskans who earn part of their livelihood from hatchery salmon; and

WHEREAS, the Southern Southeast Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play critical roles in generating economic stability, providing jobs, and supporting local communities through hatchery operations; and

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

WHEREAS, Alaska's hatchery system operates as a nonprofit model funded through cost recovery and enhancement taxes, following stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups; and

WHEREAS, Proposal 156 introduces an additional oversight mechanism that would conflict with the established regulatory framework, risking the proven balance between hatchery and wild stocks that has been achieved under existing management;

SOUTHEAST CONFERENCE

NOW, THEREFORE, BE IT RESOLVED BY THE SOUTHEAST CONFERENCE, THAT:

Section 1. The Southeast Conference strongly opposes Proposal 156, scheduled for consideration at the January 28 - February 9, 2025, Alaska Board of Fisheries meeting, and urges the Board to reject this proposal to prevent detrimental economic and social impacts on Alaska’s hatchery programs and the communities they support.

Section 2. The Southeast Conference reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to Southeast Alaska’s economy, community well-being, and sustainable fishery practices.

Section 3. The Southeast Conference calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska’s hatchery programs bring to all residents.

ADOPTED BY THE SOUTHEAST CONFERENCE BOARD OF DIRECTORS ON DECEMBER 19, 2024.

Witness by:



Zak Kirkpatrick
President
Southeast Conference

Attest:



Robert Venables
Executive Director
Southeast Conference



SSRAA
 Southern Southeast Regional Aquaculture Association, Inc.
 14 Borch Street, Ketchikan, Alaska 99901
 P: 907.225.9605 F: 907.225.1348

January 14, 2025

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

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

**RE: Opposition to Proposal 156
 Support of Proposals 157, 159, and 162**

Thank you for the opportunity to comment on proposals that you will be considering at the Southeast and Yakutat Finfish and Shellfish meeting in Ketchikan. Southern Southeast Regional Aquaculture Association, (SSRAA) is a regional non-profit salmon hatchery organization originally incorporated in 1976. SSRAA is governed by a 21-member board of directors who represent a cross section of regional salmon users, communities, and members of the public. SSRAA's mission statement is to *"Enhance and rehabilitate salmon production in Southern Southeast Alaska to the optimum social and economic benefit of salmon users."*

SSRAA's Board Adamantly Opposes Proposal 156.

Salmon Production-

SSRAA's production of chum salmon has remained relatively stable at around 200 million fry each year at six different release sites since 2019. Changes in release numbers that may occur from one year to the next are most commonly driven by lack of adult returns caused by environmental factors. SSRAA has a portion of their chum egg-take capacity in fall chum which have not survived as well as the bulk of their production which is in summer chum. SSRAA currently is not releasing fall chum at permitted capacity levels due to the lack of adults to the brood stock sites.

With the exception of the Anita Bay and Crystal Lake chinook production, chinook and coho releases are limited to the current production due to lack of additional rearing space and fresh water requirements. SSRAA with funding from the Pacific Salmon Treaty has recently replaced some of its raceways and added three new circular raceways to allow for a potential increased in chinook production. A slight increase in production and/or lowering rearing densities are expected to increase adult chinook returns aimed at mitigating the harvest decrease the Troll fleet took

during the last negotiation of the Pacific Salmon Treaty. SSRAA's release numbers by site in 2024 can be found in Table 1.

Table 1.

Number of Smolt Released, by Release Site and Species: 2024					
Release Site	Chinook	Chum	Coho	Total	% of Total
Neets Bay		61,370,000	3,400,000	64,770,000	30.3%
Kendrick Bay		36,790,000		36,790,000	17.2%
Burnett Inlet		35,290,000		35,290,000	16.5%
Port Asumcion		25,250,000		25,250,000	11.8%
Anita Bay	265,000	22,130,000	527,000	22,922,000	10.7%
Nakat Inlet		21,210,000	548,000	21,758,000	10.2%
Klawock			4,145,000	4,145,000	1.9%
Whitman Lake	668,000		322,000	990,000	0.5%
Crystal Lake	665,000		128,600	793,600	0.4%
Carroll Inlet	596,000			596,000	0.3%
Port Saint Nicholas	516,000			516,000	0.2%
Deer Mountain	93,600			93,600	0.0%
Total	2,803,600	202,040,000	9,070,600	213,914,200	

Adult Returns-

Approximately 75% of SSRAA's adult return of chum salmon are caught in the common property fishery conducted by ADF&G under pink salmon management. There are annual exceptions to this especially in low pink salmon abundance years, and at our newest release site permitted in 2018, Port Asumcion. The Port Asumcion releases have averaged a 50% interception rate primarily due to fishing restriction provisions under the Annual Allowable Harvest (AAH) in district 104. Why is this important for you to know and understand? SSRAA has not met its cost recovery goal in four out of the last five years. In some years it was due to the "blob" that affected survival rates of most salmon stocks throughout Alaska; in recent years, due to the severely depressed market value. If our releases were curtailed by 25% of our permitted egg take capacity, that would be a reduction of over **63 million** fish. If we haven't had enough fish in the terminal area under current production capacity to meet financial needs, it only stands to reason that a decrease of 63 million fish would be devastating to our returns. We can't **CHOOSE** to harvest more fish, they are already harvested, we have no control, nor should we. These fish are considered the States resource until they are in the terminal harvest area. It was intended that **ALL** users have access until that point because they are a State's resource. Our whole program and our permitted production capacity has been predicated on the fact that at this capacity of chum production, we can support the level of coho and chinook production SSRAA does that benefits more and different user groups. It has been a delicate balance to adjust chum production to a level that would support additional chinook and coho production that is expensive and doesn't pay for itself. By arbitrarily cutting

production by a number picked out of the sky, you would be undoing the balance that SSRAA, the RPT, and the Commissioner evaluated as appropriate and needed.

Value of Chum Production-

In RC2, ADF&G estimates a 25% reduction in production would mean a **\$13 million** annual ex-vessel loss of hatchery-produced fish in Southeast Alaska. SSRAA estimates a 25% reduction, using the last 5-years as an average, would equate to a reduction of **\$1.7 million** in cost recovery revenue. When SSRAA took over the coho production at Klawock hatchery, release number of chum at Port Asumcion were increased to financially support that coho production and its contribution to the local economies on Prince of Wales Island. It is an incredibly successful program supporting trollers, sport, personal use and subsistence users. The Klawock program has far reaching social and economic impacts, but it doesn't pay for itself even with a successful cost recovery program there. This scenario plays out for much of our coho and chinook production, it grew hand in hand with chum production to where SSRAA's combined production is currently. You can't have one without the other, it's just a plain fact. Should a reduction in chum occur, SSRAA corporately would have to decide what yearling programs would have to be terminated or reduced. Reducing across the board doesn't provide enough cost savings to equal the loss of revenue. The only financially responsive action would be to eliminate whole programs. Chart 1 and 2 graphically represent SSRAA's revenue and cost by salmon species.

Chart 1.

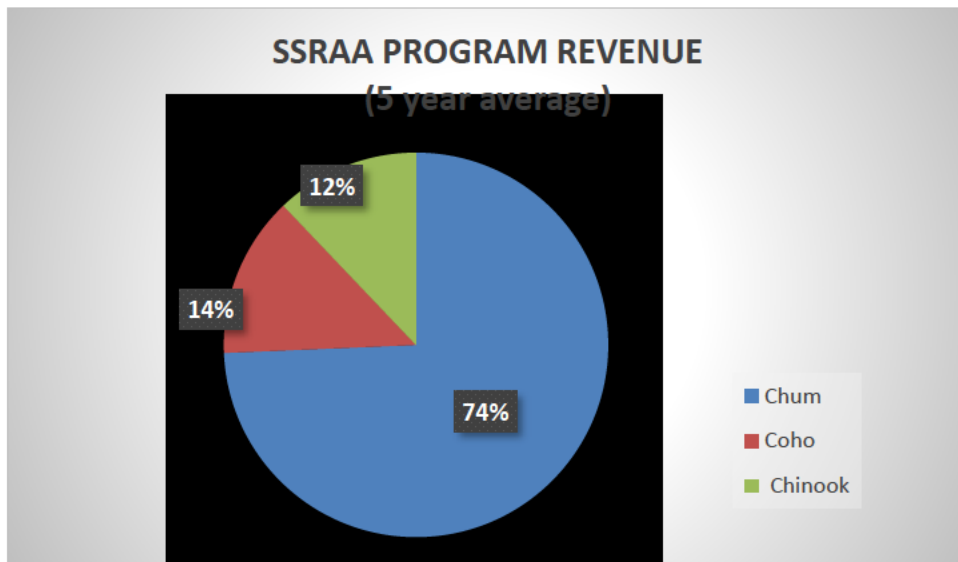
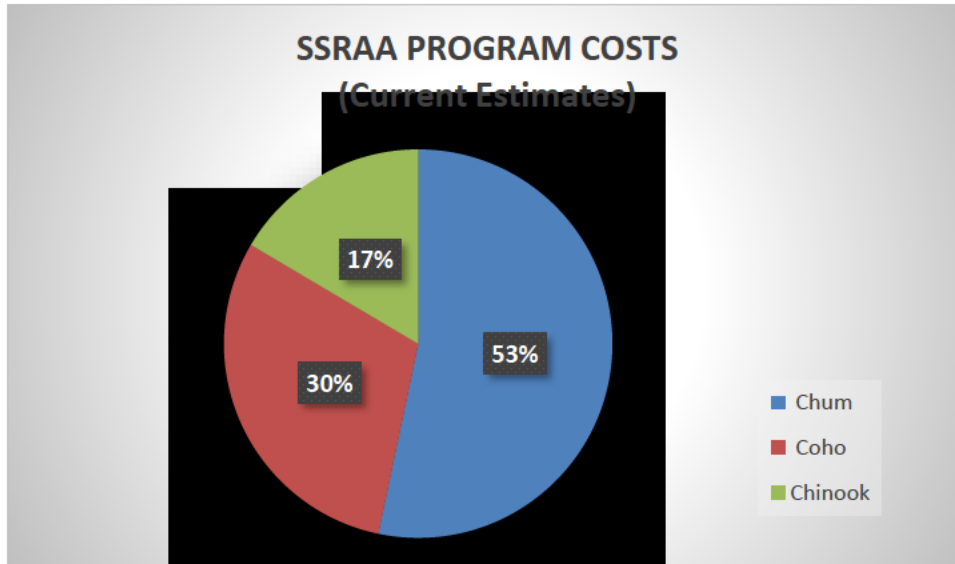


Chart 2.



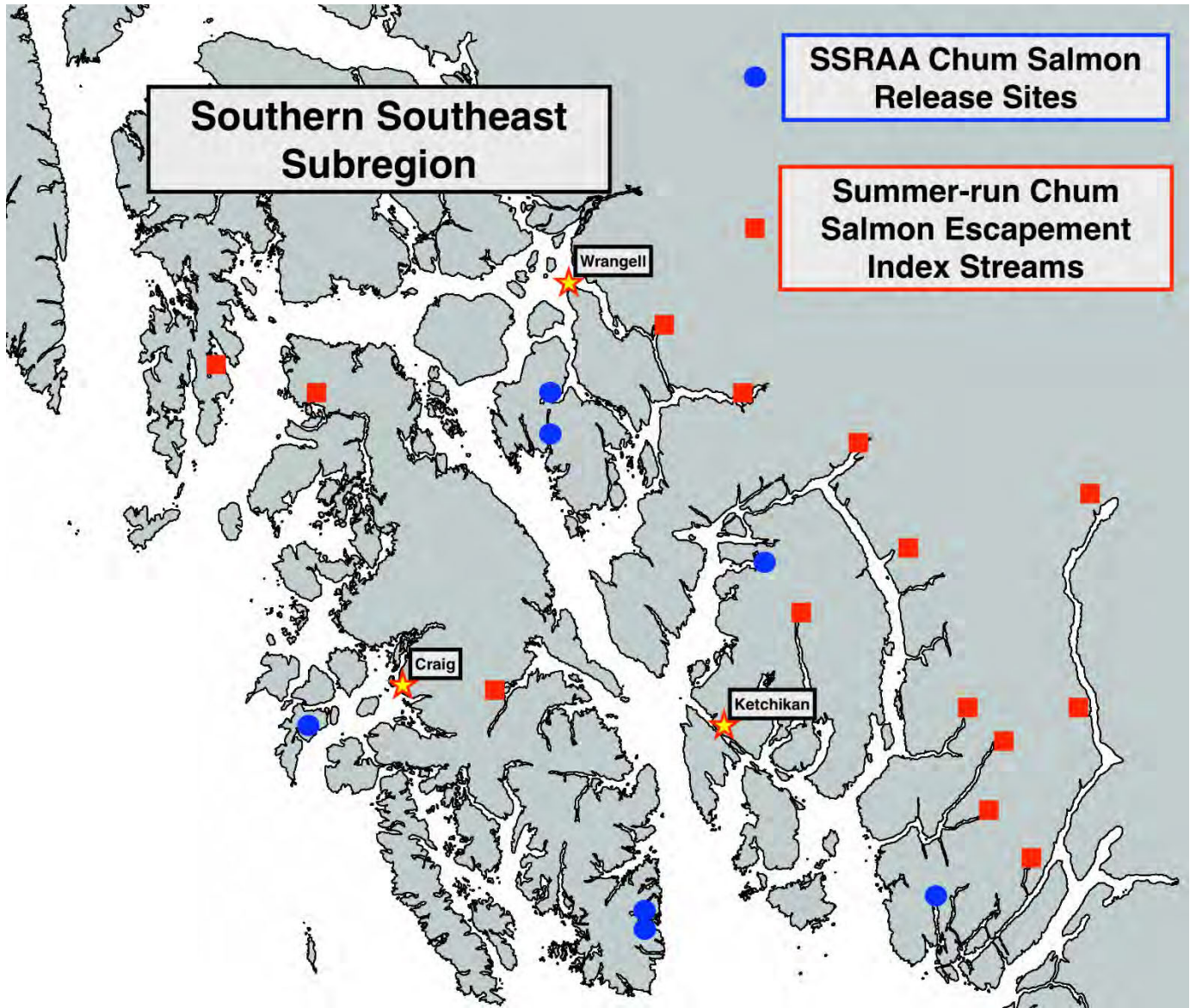
You can see for example that coho cost are 30% of production costs and only 14% of the revenue stream. 74% of production revenue is through chum salmon, yet they are only 53% of the production cost.

Enhancing not Replacing Wild Chum-

SSRAA takes exception to the notion that our programs have replaced and operate at the detriment of wild chum salmon in Southern Southeast Alaska (SSE). From its inception, Alaska prioritized minimizing the impact of enhancement efforts on wild salmon stocks by implementing strict regulatory standards governing hatchery locations, genetic and disease management, culture techniques, monitoring, data collection, and overall management practices. ADF&G developed a comprehensive framework of statutes, regulations, and policies to ensure the program's growth was sustainable and posed minimal risk to wild salmon populations.

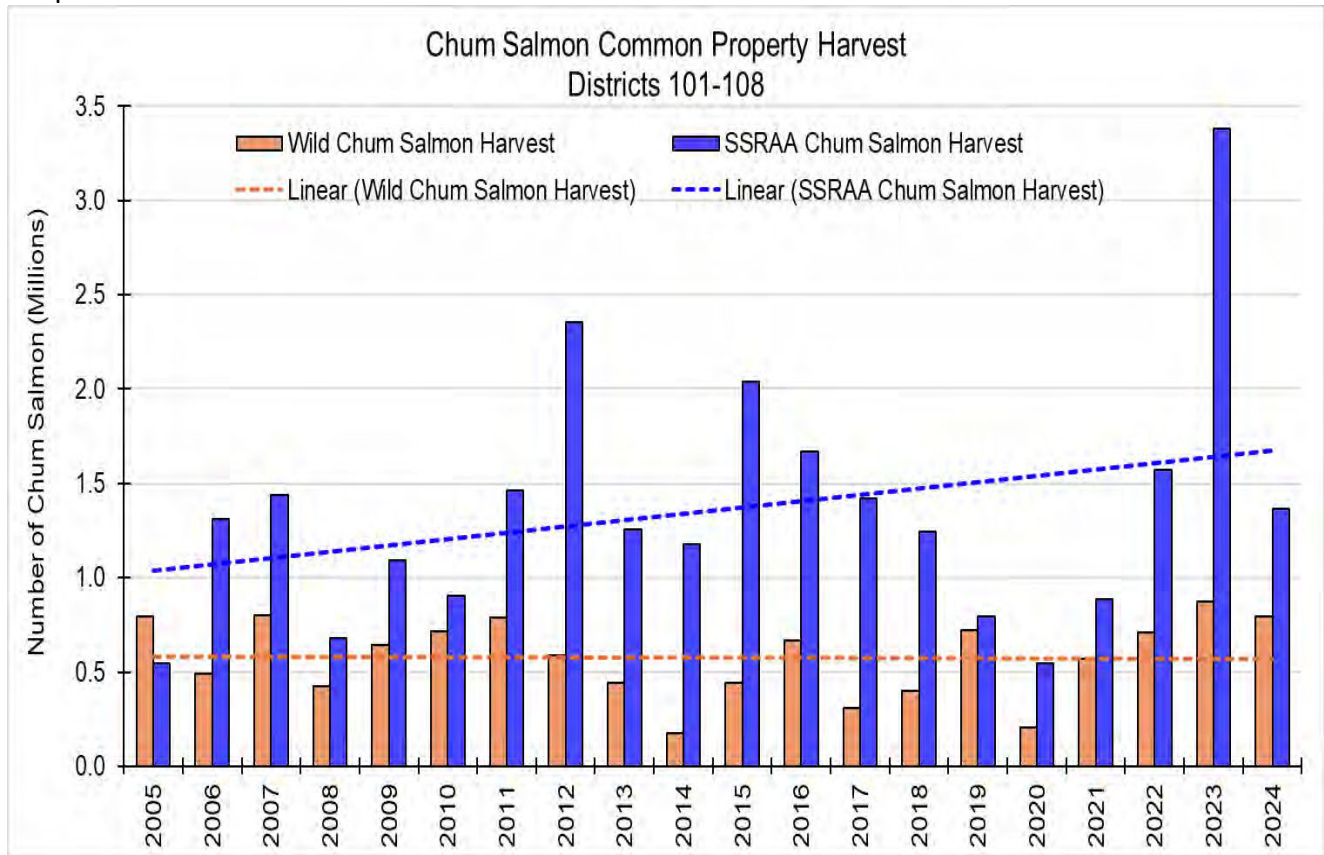
SSRAA currently releases hatchery-produced chum salmon from six locations across southern Southeast Alaska. These release sites were carefully chosen to minimize interaction with wild salmon stocks, located far from the region's wild chum salmon escapement index streams monitored by ADF&G for wild stock abundance. The founding members of SSRAA strategically selected these sites to significantly contribute to the common property fishery while ensuring minimal impact on wild stocks, Figure 1.

Figure 1.



Each year SSRAA examines over 20,000 otoliths and has invested more than \$1.3 million in its port sampling program since its inception, demonstrating its commitment to sustainable fisheries management and enhancement. Because ADF&G only estimates escapement numbers for index streams, we can't compare total return of wild chum over time, but we can document wild harvest and SSRAA enhanced harvest to evaluate if wild chum harvest has increased as enhanced chum harvest has increased. Using the data gathered by SSRAA's Research and Evaluation sampling program we can show the last 20-years of wild and SSRAA enhanced harvest of chum is SSE, Graph 1.

Graph 1.



In Conclusion-

Alaska hatcheries have operated for 50-years, working closely with ADF&G, the public, and stakeholders in an open and transparent process. The data provided in this document are a testament to the fact that this process has provided the protection of wild stocks while enhancing the chum production in SSE Alaska. Many of the concerns raised by the proposer have been addressed by ADF&G or other on time public comments. In an effort to understand more in depth interaction that may be occurring, hatchery operators along with ADF&G, have engaged in research studies addressing concerns about straying and the genetic and ecological interactions between hatchery and wild salmon. Launched in 2011, the Hatchery-Wild Interactions Project serves as a cornerstone initiative to tackle these challenges. Of the approximately \$17.2 million spent thus far, hatchery operators have contributed \$4.5 million, demonstrating our commitment to research based decision making concerning fishery decisions in Alaska.

There is currently no sound evidence that cutting hatchery salmon production would have any positive affect on wild salmon in any region or species in Alaska, but the economic damage to an industry currently facing many obstacles is undeniable.

SSRAA's Board is in Favor of Proposal 157

Creating a THA for Burnett Inlet will give SSRAA an additional tool in their toolbox should there be a need to remove excess fish from the Inlet that aren't used for broodstock or cost recovery. SSRAA plans to use every fish not needed for broodstock for cost recovery, however under current regulations, should a processor be not willing or able to remove fish, SSRAA has no vehicle to allow the fleet to effectively remove these fish.

SSRAA's Board is in Favor of Proposals 159 and 162

These proposals work hand in hand to amend the Wrangell Narrows-Blind Slough Terminal Harvest Area Salmon Plan to adapt to current conditions and also amend the special provisions section pertaining to this area to allow for adequate brood stock protection when regulations revert back to this section. SSRAA worked with local residents, ADF&G Sport Fish Division, and the Petersburg AC to submit this language.

The goal of these revisions are to-

- Adequately protect brood fish in low abundance years.
- Address the fact that there are more brood fish needed than when this plan was originally written in 1997. This brood also provides a release at Anita Bay that has not been fully realized in the past two years, and there will be no eggs for any release in 2026.
- Address the reduction in the overall percent of females arriving at the hatchery by discontinuing a bag and possession limit that encourages catch and release that can be detrimental to female spawners, especially in low water, high temperature events that are becoming more frequent.
- Provide for a closed area were adults stage before pushing up to the hatchery from June 1- July 15th. In recent years, these fish have held longer in this area due to low water. During this time, they are subject to daily pressure from fishermen, who potentially catch and release the same fish over and over until they are retained, die from stress, or finally move on a high water event. There is a long stretch of very shallow water between these pools and the hatchery weir. Fish can only move at a high water event, making them very vulnerable to continual fishing pressure.
- Address the fact that under the current plan, the Wrangell Narrows THA is open to sport fishing by boat, but the intertidal area above a line from Anchor Point to Blind Point that is accessible to shore fishermen is closed. Fish in this area mill back and forth on the tide and are essentially the same fish. Local fishermen and younger people who don't have access to a boat are disenfranchised. In 2024 there was no access in Blind Slough while the THA remained open.

This is a very complicated management plan with a lot of moving parts. There is plenty of room for compromise on dates, bag limits and potential differential bag limits between resident and non-resident sport fishermen. During severe sport fishing constraints in other areas of SE Alaska due to chinook stocks of concern, this area had a very liberal bag limit and the annual limit for non-residents did not apply. This created an unprecedented acceleration of visitors choosing to come to this area to fish, and the number of boat rentals and lodges has increased dramatically. This 27-year old plan needs to be updated to address broodstock and local access concerns. I would welcome working with stakeholders to amend the areas that are problematic as proposed, but address the issues that have been highlighted.

In closing, please vote in opposition to proposal 156 and in favor of proposals 157, 159, and 162. Proposal 156 would be detrimental to SSRAA as it now exists, and the other three proposals will make our operations more viable and sustainable. The work you all do and the time dedicated to the Fisheries Board is very much appreciated. I am available for further discussion on any of these proposals.

Respectfully,



Susan Doherty
General Manager SSRAA

Russell Sparkman

Langley, WA

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

January 14, 2025

To Whom It May Concern:

My name is Russell Sparkman, and I am a seasonal saltwater fishing guide at Steamboat Bay Fishing Club on Noyes Island. Thank you for considering public comments and for your interest in understanding how your proposals impact individuals like me and the broader saltwater sportfishing community in Alaska.

I support the proposals backed by the Southeast Alaska Guides Organization (SEAGO) for the 2025 season, particularly proposal numbers of 108 and 113 that support sportfishing business needs. These businesses are vital to Alaska's local economies, providing jobs, supporting tourism, and sustaining a community of guides, lodges, and related industries. A healthy sportfishing sector is essential to the region's economic and cultural fabric.

In earlier years, when bag limits for kings were more generous and retention limits for halibut, rockfish, and lingcod were higher, it was much easier for the lodge to attract bookings, especially at the start of the season when anglers have fewer alternatives.

If lower King Salmon retention levels non-resident are implemented for mid-May through mid-June, I fear this will further deter early-season anglers. Many anglers planning their fishing vacations in Alaska are already hesitant to book during this time due to limited opportunities for a diverse catch.

This trend contributes to shorter seasons and economic harm not just to lodges, but to the broader sportfishing community, including families and small businesses. The ripple effects—fewer bookings, reduced seasons, and decreased revenue for related industries like transportation, tackle, fuel, and groceries—impact everyone in Southeast Alaska's fishing economy. For these reasons, I strongly oppose proposals 114 through 120 due to their negative economic impact and lack of support from sound, fair science regarding proper management considerations within the sportfishing allocation.

I urge the Board to consider these points when making allocation decisions to ensure that sportfishing remains a viable and valued part of Alaska's fisheries management. Thank you for your time and dedication to preserving these resources for all stakeholders.

Sincerely,



Russell Sparkman, Seasonal Guide, Steamboat Bay Fishing Club

Submitted by: Scott and Sandy Spickler
Community of Residence: Juneau

January 13, 2025

Board of Fish

RE: Proposal 242

I am writing to express my strong support for maintaining Area 11A for personal use king crab harvesting. As a resident of Juneau, we greatly value the opportunity to responsibly harvest king crab for personal use. This tradition not only supports local subsistence but also fosters a deep connection with our natural resources.

Given the larger and safer vessels available to commercial fishermen, I believe that allowing them to venture a bit further out will ensure both the sustainability of our marine resources and the continued enjoyment of personal use harvesting by local residents. By keeping Area 11A designated for personal use, we can strike a balance that benefits both local communities and commercial interests.

Thank you for your consideration and for your ongoing efforts to manage Alaska's precious marine resources. I hope you will continue to support policies that sustain both personal and commercial use in a manner that is fair and safe for all.

Sincerely,

Scott & Sandy Spickler

[Redacted]

Juneau, AK [Redacted]

Submitted by: Craig Standlee
Community of Residence: Craig

Proposal 110, manage the sport fishery in season.....support with ATA's amendments

The charter/sport fishery needs to be managed so they stay within their 20% quota

Proposal 113, increase sport allocation to 25%....I am against this proposal

the charter fleet has had plenty of time to manage their numbers and have refused to do so. Now that they have too much participation they want more of the trollers quota. Since there is no limit on the number of charter boats they will just be back later for more quota because there is no limit on participation. The 20% quota is now the only limiting factor in the number of charter boats fishing. It is not fair to take from the trollers. Trollers can't hardly survive on the 80% they have now and losing the Aug opensers to pay back for the charter catch has hurt trollers financially.

Submitted by: Lars Stangeland
Community of Residence: Juneau

Proposal-156 oppose. If any version of this proposal was to be adopted it would not change the biomass in the ocean to any degree, it would stop stream straying and would certainly not have any effect on chinook salmon in the Yukon river as stated by the proposer. Chinook stock of concern status for two major rivers in seak has been lifted and a third major river has a pre season forecast of 40,000 chinook. Well within the escapement range. Chum salmon cost recovery is what pays for hatcheries ,very expensive programs like king,coho and sockeye could be reduced or possibly eliminated.

The financial welfare of most of the commercial fishing families would also be in jeopardy. More pressure on the wild stocks. Possible loss of programs the hatcheries do for the community like youth educational programs, scholarship programs, tourism programs that educate people from around the globe about Alaska salmon. The list goes on. Let's face it the trickle down effect of a reduction of this magnitude would be enormously detrimental.

Proposal-157-support

All THA'S should have the option for common property fishing in excess of brood stock or cost recovery needs to access hatchery produced fish.

Proposal 158 support

Always in support of efficiency.

Proposal-166 support

This would be one more tool for ADF&G to use in years of high abundance.

Deep nets would be managed thru EOand vessels that have them would be identified so comparisons could be done. With the current down turn in fish prices very few fisherman would take on the expense of a deep net wondering if they will ever be allowed to use them. I realize 3 of the past 5 seasons we have caught our allowable amount or a bit more but I know there have been years in the not so distant past where there has been an abundance of fish and we have not come close to our TAC. As for the below boarder streams until the DEPT. knows how many fish need to be in those streams and how many of those we are catching it sounds like speculation

Proposal-242 oppose

With red king crab stocks rebounding there is now enough for a limited commercial fisheries with enough left over for a small very limited personal use fisheries for resident only. Allocating all of 15Ato personal use should be adamantly opposed by the BOF

Submitted by: Adam Shoen
Steamboat Bay Fishing Club - Noyes Island

Community of Residence: Bellingham, Washington

My name is Adam Shoen. I am the General Manager for Steamboat Bay Fishing Club located on Noyes Island.

Below I have detailed the list of I am in favor of and those I oppose.

Tourism and specifically the sport fishing industry in Alaska is vital for many rural communities. While the former agreement which included mandatory limit reductions may have had flaws, but it does seem like a model to build on (rather than scrap), as it has many positives as well. Thank you all for your efforts and considerations.

SUPPORT PROPOSALS:

108

113

OPPOSE PROPOSALS:

116

117

119

120

140

141

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 Joel Steenstra and we are a small two boat charter operation out of Craig, AK. We are an Alaskan Resident owned small business. My entire family including my three Alaskan born children work in the business. I have been operating a charter boat for 21 years out of Craig. My two boat charter business has four Alaska resident employees and collects/pays over 25k in sales tax for the City of Craig. Starting in 2025, the residents of Craig voted in a seasonal sales and bed tax increase to fund the local school district. So starting in 2025 we will be collecting even more in sales tax to directly fund the school district. 88% of charter boats in Craig/Klawock originate from an Alaskan owned business.

The following is a list of the proposals we support and oppose, as well as a few that we would abstain from voting on:

Support – 108, 122, 123, 131, 134, 159-163, 193, 206-208, 211

Oppose – 104, 106, 107, 109-111, 114-120, 125-130, 140, 141, 164, 203, 205, 209, 210

Abstain – 105, 113, 121

In regards to the chinook issues, it is very important that proposals are not passed that would have a hard cap at 20%. This would result in the sport fleet transferring allocation over to the troll fleet on high abundance years while getting no chinook in return when we desperately need them in low abundance years. The sport fleet consists of 71,000 residents and the entire southeast charter fleet + non resident anglers unguided. Sport is a very large group of users with a small 20% allocation. I support proposal 108 which has a good plan.

Also for chinook, please realize how important it is that the chinook limits be front loaded in June. A 3 king annual limit is vital for having a June season for the lodge industry which provides the most value for king salmon. If we drop to a 2 or 1 annual limit before cohos show up, it will be nearly impossible to book 3 day fishing trips that the lodge industry depends on. Many ports like Craig do not have enough cruise ship traffic to sustain the charter fleet.

Thank you

Joel Steenstra
Alaska Wide Open LLC
Craig AK

Submitted by: Katelyn Stiles
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.

Submitted by: Brett Stillwaugh
Community of Residence: Wrangell, Alaska

I oppose proposal (108) , I support the current allocation of 80% troll 20% sport and do not believe this proposal can maintain this allocation as proven in the last 2 years . I believe there needs to be in season management , to keep the charter /sport fishery within their allocation of 20%

I oppose proposal (109) i believe this proposal gives the department of Alaska ADF&G too much leeway in interpreting the board of fish directives.

I oppose proposal (111) I believe this proposal unnecessarily complicates the process

I support proposals (110 & 117) I support these proposals although they have morphed into a joint RC by Alaska Trollers Association and Territorial sportsmen , that I support .

I oppose proposal (113) This alters the 80/20 split between commercial and sport harvest . This proposal will negatively affect my income as a 35 year southeast resident troller . The charter industry needs to be reined in . King salmon is a finite resource .

The only way the charter industry can continue to grow is by removing us , the troll fleet .

We are local residents who depend on this fishery for our living . I am not asking for more , just don't take what little we have .

Submitted by: Mark Stopha
Community of Residence: Juneau

I'm commenting in support of proposal 169 to allow 2 fishing rods and downriggers as legal hand troll gear for the spring and summer troll fisheries. This gear is already legal gear in the winter troll fishery, and it should be legal gear for the spring and summer fisheries as well to make the regulations uniform, and so that hand trollers don't unnecessarily need two sets of fishing gear.

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 David Street of Juneau, Alaska. I am a commercial 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.

Proposal 156 should be opposed. Who would it hurt? The commercial and sport fishermen of SE AK would be negatively impacted as well as the regional economies. As a past president of the Southeast Regional Aquaculture Association, it would negatively impact our finances. It would require the Association to take more salmon in cost recovery operations impacting sport and commercial fishermen. It would mean less money to subsidize our king salmon projects. It would mean less hatchery king salmon being raised and fewer king salmon fishing opportunities for sport and troll fisheries.

Who would it benefit? There is no credible science to confirm that reducing chum and pink hatchery production in SE AK will have demonstrable benefits to wild king salmon. Yes, there is some bad science and conspiracy theories that make this claim' but don't use bad science to make a significant change in policy. Don't dismantle hatchery systems in SE Alaska that provide benefits to a wide group of users and think this will solve the problem of low wild king salmon production. There is no factual basis for this.

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,

David Street
Juneau, Alaska



Members of the Alaska Board of Fisheries,

My name is Erik Stromme, and I am a second generation power troller and sportfisherman operating out of Elfin Cove. I was born in 1992 in Juneau and have spent most of my life in Southeast Alaska, primarily in Juneau, Elfin Cove, and Gustavus. I have a great appreciation of the natural resources we are privileged to have access to, as well as a strong belief that the public should have a voice in the process of how those resources are managed. Recently I have been able to participate in this discourse as a member of the Elfin Cove Fish and Game Advisory Committee, and have learned an incredible amount in a very short time. I look forward to continuing to participate in shaping our regulations towards sustainability and equity.

Power trolling is my primary source of income, but I also take great pleasure in sport fishing for various finfish and shellfish. Since my childhood, I have seen an explosive growth in the scale of charter operations around Cross Sound, and fewer trollers on the water each year. It is a strange feeling to watch more sport charter boats arrive every year as the old familiar troll vessels go missing to drydocks, distant harbors or dismantling. This change is also reflected in the culture of smaller fishing towns like Elfin Cove. Once modestly populated year round, the town now swells to bursting with summer charter activity, then empties in September except for the commercial boats and a handful of year round residents. It has been difficult to watch this change and see proposed regulations that would increase the sport chinook quota in the non-limited entry fishery of charter fishing. To me, it is clear that the commercial troll fleet is bearing the brunt of poor prices and high fuel costs, while the nonresident sport charters continue to grow in size unrestrained. The health of our commercial fishing is dependent on equitable management of fish stocks, and distinct harvest quotas between sport and commercial industries.

Commercial troller chinook quota is managed in season, with fish tickets submitted relatively frequently in 3 or 5 day increments. This fish count means that ADFG can accurately predict the timeframe for commercial trollers to catch their harvest limits, reducing the likelihood of exceeding our 70% allotment for the July king opener. Sport catch is reported more infrequently, and is not currently managed in season, resulting in overages the last two years, hampering our second period of chinook retention and impacting our income severely. I understand that instability in chinook regulation can dissuade charter customers, but management of the resource should apply to everyone equally, regardless of their bottom line. If commercial trollers can be cut short of their expected king harvest, it should be applied to the sport sector as well. Sport charters have the ability to harvest numerous fish species compared to the limited scope of commercial permits, and the experience on the water should be the primary draw for charter guests, not the pounds of fish pulled from the water. I would like to see regulations that promote strong protections towards fishery stocks, opportunities for all user groups to meet their limits without exceeding them, and priority of the sport sector harvest to Alaska residents

Prop 104 Support

Though I recognize the complexity in regulating a subsistence chinook quota, it is in keeping with the spirit of prioritizing salmon availability to Alaska residents, specifically rural residents.

Prop 105 Opposed

While I can't claim to fully understand the legal validity/invalidity of this proposal, I have to say that I personally feel that Alaska residents have a greater priority, connection, and stake in the fish resources within our state. Non-residents would not be as adversely affected by a mismanaged or collapsed resource compared to people who live around and depend on said resource.

Prop 108 Opposed

I appreciate the suggestion for a percent cap on quota transfer, but I don't believe that would work well with the idea of a total quota harvest. Transference of the quota between sport and commercial is a somewhat recent phenomena, and one that commercial trollers have met with much disapproval. Much is made of future years of "high abundance" where trollers will be mopping up kings left on the table by the sport fleet, but I just cannot place my hopes on high abundance years anywhere in our future given the current trends. Changing our 80/20 split between commercial and sport doesn't seem to have much merit other than increasing one sector's slice of the pie.

Prop 109 Support

Prop 110 Support

I strongly support enforcing of the long held 80/20 commercial-sport chinook harvest split, the clarification of bag limits in different management tiers, revitalizing in season management, and prohibitions towards "Shaping".

Prop 111 Opposed

I believe the 80/20 split should be maintained.

Prop 113 Opposed

I strongly opposed changing the 80/20 split of the chinook harvest. While currently the argument is submitted that a 25 harvest by the sport charter fleet would allow for leftovers toward the commercial troll fleet, I don't believe high abundance years are in our future, and the size of the sport fleet could easily grow to consume whatever limit was set within several years.

Prop 114 Support

Prop 116 Support

Priority should be given toward resident fishers. Current regulations severely handicap the ability of inside water communities in their ability to harvest chinook salmon.

Prop 117 Support

Prop 118 Support

Prop 119 Support

Closing nonresident sport King fishing for two days a week would not significantly impact the harvest numbers for the sport fleet, while allowing for areas commonly fished a brief relief for the fish to re-school and seek out preferred habitat without risk of being caught.

Prop 120 Support

Prop 121 Opposed

Prop 126 Support

This would support protecting a stock of concern, which would positively impact king salmon runs in the area.

Prop 131 Support

Single or two day king openers heavily disrupt fishing activities for commercial trollers while providing minimal income for effort, as well as potentially forcing people to fish in poor weather conditions. Limited harvest fisheries allow for better management of the quota while allowing catch effort to occur over a greater length of time, giving flexibility to the troll fleet. There is some detriment toward larger boats who have a greater harvest ability, but it gives smaller boats in less productive king areas greater ability to participate.

Prop 156 Opposed

While personally I do not participate in the chum fishery, it represents a major source of income for many commercial trollers and seiners, and a 25% reduction would be catastrophic for their livelihoods. There is ongoing debate as to the impact of hatchery fish on wild salmon stocks, but currently I don't see enough concrete research indicating a 25% reduction in egg take would have any positive impact on the health of wild salmon stocks. It would also severely impact the stability of the hatchery operations, beyond just that of Pink and Chum production.

Prop 210 Support

Protecting fish from overharvesting should be a priority, and many pelagic rockfish have been overlooked and I believe overharvested.

Thank you for your service to our fisheries, and your time taken to read and consider my comments on these proposals.

Erik Stromme
F/V Genesee
Elfin Cove AK

Submitted by: Sven Stroosma
Community of Residence: Mount Vernon, WA

I oppose proposal 156

Submitted by: Jacob Strubbe
Community of Residence: Sitka

Hello, my name is Jacob Strubbe. I have been a comm. fisherman in Alaska for 26 years. (Primarily salmon trolling) I am very opposed to any fishery without in season management, it's wild in this day and age that any fishing group would even consider asking for that. It is a very selfish and short sided approach to managing any resource or business. My other main concern is prop 113, a reallocation would be detrimental to my operation, and many others. We rely on that allocation to make boat and permit payments, house payments, tuition, food etc. The last couple of years have put a lot of stress on my life and business, I am not sure it could sustain this loss. Please do not reallocate my livelihood away. Thank you for your time.

Jacob Strubbe

Submitted by: Mike Sullivan
Community of Residence: Sitka

Dear Members of the Alaska Board of Fisheries,

My name is Mike Sullivan, the Owner and operator of a Charter Fishing business in Sitka where I live year round. I appreciate your time and understanding on the proposals presented to you. I understand the difficult task of deliberation will affect me, as well as the different user groups here in Southeast. I oppose proposals 114,115,119,120 that suggest reducing the annual King Salmon limits for non resident sport anglers. My May thru June trips, which make up a large portion of my fishing season, would be negatively Impacted by these reductions in nonresident annual King Salmon limits. For example; I take groups fishing for three to four consecutive days. So, if King Salmon limits get reduced to only two or even worse one fish annually, that doesn't leave much opportunity, especially in May and June when the Cohos are non-existent. Also with bag limits, and annual limits that continue to be reduced for King Salmon, Ling cod and Rockfish on top of day closures on Halibut, We can't afford to go any lower and expect to keep our customers coming back year after year. Like I stated previously, I am an owner/ operator of a one boat charter fishing business and I live in Sitka year around . With the high cost of living in Sitka, my family depends on my fishing income. If we lose our clients due to the decrease in opportunity to harvest King Salmon that would greatly affect me directly and my clients. It would also affect the city of Sitka, including city sales tax, bed tax, restaurants, local shops, Grocery stores, airlines, Marine fuel taxes, and local small businesses I use for repairs and maintenance for my Charter business just to mention a few. I know this isn't something you take lightly, but I would hope that you would

consider opposing these proposals, as they negatively affect the charter fleet. Let's help prevent Sitka from losing its reputation as a world class sport fishing destination. Its time to make decisions to keep southeast Alaska a viable place for all to live.

Sincerely,

Mike Sullivan

PC488

Submitted by: Naomi Sundberg

Community of Residence: Gustavus

Dear Members of the Alaska Board of Fish,

My name is Naomi Sundberg. I live in Gustavus and fished Dungeness crab from 1991-1998 first as crew and then as boat and permit holder. I sold my boat and permit in 1998 and am now part-time crew and shore support with our family business, Stoney Point Seafoods.

I am writing in support of proposition #251 which would change the Dungeness crab summer season from June 15–Aug 15 to July 1-Aug 15.

Before the sea otters moved into this area and eliminated most of the crab in Glacier Bay and Icy Straits, fishers had more area and bays in which to set pots and could start the season where the crab hardened up first. Now the crab population is concentrated in only a few areas where everyone fishes, starting on day 1. This has been a detriment to the fishery as so many crab in June are still soft, come up in the pots, are handled and tossed back into the water as each boat recatches the same crab. In the 1990s ADF&G conducted studies on the effects of Dungeness crab being repeatedly handled and thrown back into the water and found there was an increased mortality due to concussion.

It is my understanding that ADF&G does not have the authority to close or alter the season once it opens, even when fishers report that crab are in a vulnerable, soft state.

Crab that are caught and marketed when soft have not filled the shell with meat yet and are not the quality of a hardshell. This has a negative effect on the consumer market and thus, the overstock then affects the next years market.

Since the crab are consistently soft in June in this region, and ADF&G has been known to change the dates of Dungeness fishing seasons in the past, I ask that in order to protect the resource and provide a high quality product, the opening of Dungeness summer season be changed to July 1.

A pre-season survey as used in most other fisheries, could help determine whether the shell conditions are harvestable and would be helpful too, if funding could be allocated.

Thank you

Submitted by: Kimberly Szczatko
Community of Residence: Wrangell

As a business owner in Wrangell, I am 100% opposed to this idea. Over the years Wrangell has had significant losses to its economy - logging, fishing, business opportunity, tourism, ferry service, etc. This would have a significant impact on our ability to provide for our families. This proposal is detrimental to everyone in our community from the business owners to the tribal members.

In addition, Proposal 156 addresses hatchery production cuts which would have a significant impact on all Southeast Communities. If this Board of Fisheries proposal were to pass, hatcheries in Southeast would be facing the potential of closing their doors in the next 10-15 years, potential loss of fishing opportunity and income to the commercial fisheries users, sport charter programs, marine and shoreside sport users and the personal use fishermen.

If this proposal were to pass, it would be detrimental to Southeast Alaska's economy causing more community members to leave for jobs elsewhere. We can't afford to take another hit.

Proposal 156 must be struck down.

Submitted by: Anthony Taiber
Community of Residence: petersburg

I am in support of Proposals 230 and 231, establishing a commercial squid fishery using jigs in Southeast AK. Establishing this fishery would provide needed opportunity to a wide variety of the fishing fleet. Squid is a valuable resource and is not being utilized.

Submitted by: Anthony Taiber
Community of Residence: Peterburg

I am writing in opposition to proposal 156. Reduction of hatchery salmon production would be devastating to Southeast Alaska. Fishermen, communities, schools, local businesses are already on the brink of economic failure in this region. I don't feel that Fairbanks residents who are separated from the impacts of this proposal should attempt to undermine our economy. Hatchery production along with sound management from ADFG have been very successful at protecting wild salmon runs in the region.

Please vote no on Proposal 156.

Anthony Taiber



550 S Franklin St - Juneau, AK 99801

Ph 907-463-4671 Ph 907-738-1607

Ph 360.734.8175 Fx 360.734.2203

hank@icystraitseafoods.com

January 10, 2025

State of Alaska Board of Fisheries

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

I am writing in opposition to proposal 156.

As a seafood processor in Southeast Alaska, we are reliant on hatchery chum salmon to provide local jobs and provide chum salmon markets for local fishermen. In turn, fisheries business taxes on chum salmon we purchase from the fishing fleet and process is paid to the State of Alaska and shared with the local Borough. A 25% reduction would severely impact the fishermen that deliver salmon to our plants and severely impact the viability of our business and reduce fish taxes paid to the State of Alaska.

There isn't any scientific evidence in this proposal that the current amount of chum salmon egg take permitted by the Alaska Department of Fish and Game adversely affects wild salmon stocks.

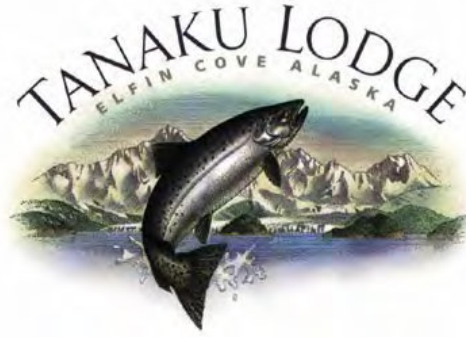
Presently the Alaska Department of Fish and Game manages hatcheries using sound scientific practices. There is rigorous oversight for hatchery permits that are issued only after a stringent public and scientific review process.

Adopting this proposal would create instability for fishermen, processors and the communities that rely on fish tax revenue.

Regards,

A handwritten signature in black ink, appearing to read "Hank Baumgart", is located below the "Regards," text.

Hank Baumgart
Taku Fisheries/Icy Strait Seafoods, Inc



January 12, 2025

Alaska Board of Fisheries

P.O. Box 115526

1255W. 8th St

Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

My name is Evan Harder and I have worked/lived seasonally in Elfin Cove, AK over the last three years. I have been an active member in the community and look forward to enjoying this special place over years to come as well as sharing this special place with my family as it grows. My fiancé's family has owned Tanaku Lodge located in Elfin Cove for the past 29+ years and has played a major role in the community of Elfin Cove for just as long. I appreciate your willingness and attention to review comment submission from the public as the decisions being made, play a major role in all our lives.

I want to take a moment to outline my clear support for King Salmon related proposals, 108, 122, 123, 131 and 134. In addition, my support for groundfish proposals 193, 206, 207, 208 and 211. I feel that these are clearly the best options proposed to address the issues at hand. I would also like to express my opposition for the following proposals as they do not adequately address the issues at hand. King Salmon Proposals: 104, 106, 107, 109, 110, 111, 114, 115, 116, 117, 118, 119 and 120. I want to emphasize my strong opposition to proposals 119 and 120 as these clearly are not the best solution and would be a major detriment to many of the businesses that support our cove.

Over the past few years that I have spent in Elfin Cove and working at Tanaku Lodge, it has been apparent that King Salmon fishing is one of the most highly sought after targets for anglers across the country. When thinking about reduced annual limits for non-resident anglers, this just doesn't seem like a sustainable solution. This may have been an acceptable solution in the past but given the strict regulations for other species of fish that

are able to be targeted during this time of the year, this would be a major detriment to our business as well as many others.

Having to deal with such strict regulations and ever-changing requirements for many species that our guests have come to love has taken a major toll on our business as a whole. The main issue that we are facing is the ability to fill our lodge, given the fact that many people are paying large amounts of money to come fishing in Alaska and to not be able to target all species puts this in serious jeopardy. We have people who travel from all parts of the world to target specific species' and we are already seeing less return from previous regular customers, given the changing regulations.

The effects of these decisions don't only impact our industry directly but also all businesses that support our industry. For example, our operation relies heavily on businesses in and around Juneau such as transportation in Juneau, lodging in Juneau, food service in Juneau, transportation from Juneau to Elfin Cove, recreation in Elfin Cove such as the local bar, general store and fuel dock.

With all this being said, I again want to express my support for king salmon proposals 108, 122, 123, 131, 134 and groundfish proposals 193, 206, 207, 208 and 211. In addition my serious concern for king salmon proposals: 104, 106, 107, 109, 110, 111, 114, 115, 116, 117, 118, 119 and 120.

I look forward to hearing the decision made on these proposals and appreciate you taking the time to hear public comments.

Thank you,

Evan Harder

Tanaku Lodge



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 Hannah Meier and I am a manager at Tanaku Lodge located in Elfin Cove. I am also very involved in the community and care deeply about the progress of Elfin Cove. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me and my business as well as the different user groups in our region.

I am writing to you to express my support for King Salmon related proposals 108, 122,123,131 and 134. I am also in support of groundfish proposals 193, 206,207,208 and 211.

I would also like to express my strong opposition to the following king salmon proposals;104,106,107,109,110,111,114,115,116,117,118 and especially 119 and 120.

I have been the manager at Tanaku Lodge for three years but have worked there my entire life, taking part in various rolls at the lodge. I grew up in Elfin Cove during the summer months and consider it one of my homes. The king salmon fishing brings in about half of our business for the lodge during the months of May and June. Those clients come to specifically target king salmon and with the increased restrictions, filling spaces at the lodge during this time of the summer has grown increasingly difficult. If these restrictions pass, we will most certainly lose these long times clients which would be devastating to our small family-owned business. We simply can't afford to lose this business as our small business provides for two families year-round and employs eighteen people.

These proposals would also negatively affect the community of Elfin Cove in more areas than just the charter fishing industry. The economic implications of restricting sport fishing for king salmon cannot be understated. The sport fishing industry in Elfin Cove contributes significantly to our local economy through tourism and associated businesses. Limiting fishing opportunities may result in decreased tourism and loss of jobs in our communities that depend on recreational fishing for their livelihoods.

Alaska's fisheries are a shared resource that should reflect the diverse interests of all stakeholders, not just those of commercial enterprises. Sport fishing contributes significantly to Alaska's economy, creating jobs and supporting local businesses that depend on tourism and recreation like Elfin Cove. Prioritizing commercial interests undermines the balance we need to maintain healthy fish populations and a vibrant sport fishing community.

I urge the Board to consider these points when making allocation decisions to ensure that sport fishing remains a viable and valued part of Alaska's fishery management.

Thank you for your time and dedication to preserving these resources for all stakeholders.

Sincerely,

Hannah Meier
Manager
Tanaku Lodge LLC



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 Susan Meier one of the Owners at Tanaku Lodge located in Elfin Cove. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me and my business as well as the different user groups in our region. I am a member of the Elfin Cove Advisory Committee but due to the fact that there is a disproportionate amount of commercial fisherman on our board the sport fishing group was out voted on every proposal. So, I am submitting comments here.

I am writing to you to express my support for King Salmon related proposals 108, 122,123,131 and 134. I am also in support of groundfish proposals 193, 206,207,208 and 211.

I am also writing to you to express my opposition to the following king salmon proposals;104,106,107,109,110,111,114,115,116,117,118 and especially 119 and 120.

We have been in business at Tanaku Lodge for 30 years. Through the years we saw the sport fishery opted to allocate a larger portion of the king catch at the biggining of the season when anglers have fewer alternative species to fish. For many years May and June were the easiest of our months to fill. Now they are becoming one of the most difficult and less consistent. We can't afford to go any lower on allocation or make the booking process more complicated by making days of the week off limits. This becomes very frustrating to our clients. They start to feel that the state does not care about getting their business.

Fewer guests for us does affect our small bush community. Fewer guests for us means less fuel bought at our fuel dock. It also means less jobs for those that support our areas fishing. Fewer guests means fewer fishing license revenue for the state and less food bought in Juneau.

In these last years of less and less allocation we have had to market our shoulder weeks differently and offer discounts. This makes it difficult for staffing as well as overall season success. Our business supports two families year-round and provides jobs for 18

employees. Our children have been involved since they were old enough to contribute to this family owned and operated business. It is their intent on taking this business over and continuing for the next generation. Our family history in Alaska goes back three generations and we truly hope there can be good decisions made to help all industry counterparts be successful without pitting one against the other.

I urge the Board to consider these points when making allocation decisions to ensure that sport fishing remains a viable and valued part of Alaska's fishery management. Thank you for your time and commitment to preserving these resources for all stakeholders.

Thank you for your time and dedication to preserving these resources for all stakeholders.

Sincerely,

Susan Meier
Member/Operator
Tanaku Lodge LLC

PC495

Submitted by: Robert Tarbox
N/A

Community of Residence: Petersburg AK

I SUPPORT Proposal 159,

Please clarify what "EQUAL ACCESS TO FRESHWATER AND SALTWATER" KING SALMON FISHING MEAN? does this mean equal rules/laws for resident and non-resident fisherman?

I strongly SUPPORT PROPOSAL 163

I also would like to see the DAILY King Salmon limit in Blind Slough for residents and non-residents reduced to 2 per day, or restrict non-residents bag limit to Hatchery caught Kings only.

PC496

Submitted by: Caullen Taylor
F/v ChippewGal

Community of Residence: Haines

Prop 156 will directly affect my career in fishing in a negative way. I will be forced to sell out from gillnetting because it will effectively shut down district 15 which is where I fish out of during the summer gillnetting.

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 Craig Taylor of Ketchikan, Alaska. I am a commercial fisherman. I was a member of the crew of a Southeast Alaska purse seiner for nearly 10 years. Then I enrolled in the University of Washington and earned a bachelor's degree in fisheries management. I also earned an MBA and a PhD with my years as a commercial fisherman serving as the backbone for my work in communities and enhancing communities and individuals.

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 think Proposal 156 will damage communities and the individuals who work and serve in them.

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,

Craig Taylor
Ketchikan, Alaska



Submitted by: Andrew Terhaar
Community of Residence: Sitka

My name is Andrew Terhaar, F/V Audacious out of Sitka. I am commenting to oppose proposal 202.

The proposal seeking to clarify dinglebar regulations is very confusingly worded. It's unclear as worded whether spare trains may be aboard the vessel and will lead to enforcement issues.

The elimination of the ability to trail a spare train at the surface only makes the ergonomics and work within the fishery harder and more dangerous. The proposal does nothing to change the actual fishing that affects catch rate or management it only makes things harder for the fishermen. When a train with fish is hauled up it often comes up twisted and tangled and not ready to be set back out. If a different untangled train is set out to replace the tangled one the fouled train has to be moved before the new one can be hauled. Since we only fish one side of the boat in the dinglebar fishery, the fouled train is in the way of hauling the line in the water. The easiest and safest way of moving it is to untangle it behind the boat and leave it dragging on the surface. Otherwise a fisherman would have to untangle it in the pit where up to 3 people are standing making the work more difficult and more dangerous. There is ZERO percent chance that a train dragging on the surface could ever catch a fish. It is only done to try to make the work more efficient and ergonomic.

This fishery is already the most physically difficult fishery that I participate in and this change is entirely unnecessary only making the work more difficult and dangerous while changing nothing affecting actual catch rates or management. I oppose proposal 202.

Thank you,

Andrew Terhaar, F/V Audacious

TO: Alaska Board of Fisheries

The Territorial Sportsmen Incorporated (TSI), a Juneau based conservation organization with more than a thousand resident members and a long-time participant in the Alaska Board of Fisheries process, transmits the following comments on the Southeast Alaska king salmon management plan proposals to be considered at the Ketchikan Board of Fisheries meeting in January and February, 2025.

Proposal 104. Opposed.

TSI, along with thousands of residents of Southeast Alaska, have long viewed the resident salt water king salmon sport fishery to be a quasi-subsistence fishery since the fishery is clearly a food fishery. It is also the only fishery in Southeast in which residents can access wild king salmon. (All freshwaters are closed to wild king salmon fishing.) Therefore, the resident sport fishery has been protected by a long-time resident priority in the king salmon management plan, and by the state constitution.

But TSI opposes proposal 104. There are far too many holes and unanswered questions in the suggested plan. We don't feel commenters such as ourselves should do the proposers hard work for them. Also, the proposal disenfranchises the residents of Juneau and Ketchikan, the majority of the Southeast Alaska population, from accessing a nearby king

salmon fishery under the same rules as the remainder of the region.

There does not appear to be any monitoring mechanism for catch reporting, or for closing the proposed fishery. King salmon catches need to be tallied annually under the US-Canada Treaty, and there would be a substantial cost associated with gathering permit information. New monies would likely need to be appropriated by the legislature for the department to adequately determine the catch inseason.

The king salmon resource has been fully allocated for decades, and disruptions will occur if a new priority fishery is shoehorned into the existing management regime. The five percent request (10,000 king salmon in 2024) would have to come from the troll fishery and the sport fishery, which would require tightening of current limits, limits unspecified and undeveloped in the proposal

Why would the department, in the absence of specific language, ever close a subsistence fishery after five percent of the treaty fish have been caught, especially when they won't do it now when nonresidents have exceeded the sport quota?

The proposal also fails to specify bag limits, trip limits, seasonal limits or even size limits. Enforcement issues abound. The Board should not be forced to guess at these numbers. The same uncertainty would apply to bycatch in the proposed fishery.

The fishery might be considered a new fishery under the US-Canada treaty, and therefore require bilateral approval at the Pacific Salmon Commission.

For all of these uncertainties, we are opposed to proposal 104.

Proposal 105. Opposed

The proposer seeks to have regulations for nonresidents in federal waters the same as state waters regulations for residents. We are opposed to liberalizing nonresident regulations as nonresidents already catch 75-80 percent of the sport king salmon catch. More fish for nonresidents will not fix any problem.

We propose that in federal waters, the bag limits for salmon, rockfish and sablefish for residents and nonresidents be the same as for nonresidents in state waters. Only a small fraction of the king salmon catch (1 percent or less) occurs beyond three miles, and only a fraction of that one percent is by residents, so the change proposed here is not detrimental to either residents or nonresidents.

Proposal 108. Opposed

TSI supports the current allocation of 80% troll and 20% sport fish, and opposes any in season transfer from the troll to sport fishery. TSI believes the solution to current sportfish overharvest issues lies in

more effective management of non-resident harvest rather than a re-allocation of the resource away from longstanding traditional users. TSI also supports in-season management of the sport fishery to maintain the 80/20 allocation.

Proposal 110. Favor Provisionally

The Territorial Sportsmen Inc. supports this proposal, with some modifications. These comments and those related to Proposal 117 deal with the SE King Salmon management plan and the allocation and management of the sport harvest under the treaty. Our proposed modifications to this proposal are necessary because ADF&G advised that the 2 fish limit to July 1 does not result in keeping the sport fish harvest under the quota.

At the Anchorage 2022 meeting of the Board of Fisheries a compromise deal was made between the Trollers, TSI and the sport fish guiding organization (SEAGO) concerning sport king salmon management in SE. It was supposedly ratified by the Board at that meeting.

However, mismanagement by the Department resulted in the sport fish allocation of 20% being greatly exceeded by 17,000 fish. After a similar situation in 2024, the Department closed the season in August for all sport fishing in salt water for

kings. The intent was to take the overage out of the late troll (80%) fishery. From the resident sport fisherman's standpoint, this resident closure was totally unacceptable and was not included in the Anchorage agreement.

TSI has consistently supported the 80% - 20% treaty allocation between the troll and sport fisheries. Since the agreement reached at the Anchorage meeting and ratified by the Board was ignored by the Department, we request the Board either change the quota allocation or design a management regime that controls the sport fishery so that the Troll fishery has some stability and the limited resident fishery remains open.

From our standpoint, the Anchorage agreement had one basic agreement that everyone supported and that was that the resident sport fishery would not be subjected to closures as residents traditionally harvest only about 25% of the 20% allocation ever since the inside waters Spring fisheries were closed. As we predicted in our testimony to the Board, an unregulated nonresident king salmon fishery would cause us to exceed the sport fisheries quota annually at the continued expense of the troll fishery and a closure to the resident fishery.

We were advised by the Department that the Board had tied the hands of the Commissioner for 2024 and we would have to get the Board to make specific changes to the plan to protect the resident sport king salmon fishery.

The data provided by the Department is shocking and revealing. Nonresidents harvest 75% - 80% of the SE chinook. As the nonresident fishery continues and grows every year, residents deserve a system that doesn't discriminate against them.

Article VIII, Section 2 states "The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the state, including land and waters, for the maximum benefit of its people." All we are asking is that resident king salmon fisheries be allowed to continue through the season as resident SE king salmon are basically a food fishery. Under the present management plan interpretation by the Department, the resident fishermen are given the lowest priority of all the king salmon user groups, including non-resident fishermen.

Resident fishermen are getting upset with the continued mismanagement of the king salmon stocks by the Department. The simplest solution is for ADF&G to

implement an in-season management program for non-resident harvest of king salmon. Stricter reporting guidelines and more stringent enforcement would allow the Department to restrict non-resident fishing before severe closures of resident fishing is necessary and the quota is severely exceeded. That would save the limited resident food fishery and the troll quota.

If the Board does not consider these suggestions in some form, the only solution for residents is to ask the legislature for relief.

Proposal 113. Opposed

TSI supports the traditional allocation of 80% troll / 20% sportfish and believes the solution to current sportfish overharvest issues lies in more effective management of non-resident harvest rather than a re-allocation of the resource away from longstanding traditional users.

Proposal 117. Favor with amendment

TSI cosponsored this proposal with the Alaska Trollers Association. At the time the proposal was drafted both groups

fully believed that an annual nonresident limit of two king salmon prior to July 1 and one thereafter would reduce the nonresident catch enough to keep all fisheries operating for the full season within their quotas. A year later, TSI and ATA filed a data request with ADF&G to determine what the 2023 king salmon catch would have been if the two fish annual limit had been in place. It turns out that the two fish limit prior to July 1 and one fish thereafter would still have exceeded the sport quota by about 10,000 king salmon. Clearly, a two fish nonresident annual limit prior to July is not restrictive enough, and other resident fisheries pay the price.

Therefore TSI proposes strengthening its proposal, as per the following suggested regulatory wording:

In tiers (c) through (h) of 5 AAC 47.055, the nonresident annual king salmon limit is two fish prior to June 1 and one fish thereafter, unless the commissioner determines, using the best available information, that a later date in June can be selected for the annual limit reduction and still keep the sport fishery within its 20 percent quota. To achieve the best available catch information, the commissioner may impose or strengthen catch reporting requirements for nonresident anglers.

Proposal 120. Favor

TSI favors the adoption of Proposal 120, an action which is expected to reduce the sport king salmon catch to a level that

is very close to the sport allocation. It is thus likely that inseason management may not be needed.

As a friendly amendment, if a two days per week nonresident king salmon closure is considered too costly to the lodge industry, we suggest combining a one day per week king salmon closure with a two fish annual limit for nonresidents prior to July 1 and one fish thereafter. This action would bring the sport catch down to very near the sport allocation, and not go over by many thousands of fish as it does under current management.

Thank you for the opportunity to comment on these proposals. We will submit another document on the remaining proposals.

Sincerely,

Ryan Beason, President

Territorial Sportsmen Incorporated

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc opposes proposals 258 and 259. Opening closed waters could create increased user conflicts between sport anglers and commercial fishermen. Many of these areas were closed to allow sport anglers to fish without creating conflicts between user groups.

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc supports proposal 242. TSI believes that the best use of the 11a king crab allocation is 100% personal use. Over the past 20 years, every time there is a commercial opening, 11-A King Crab stocks are depressed for a number of years. This has resulted in personal use closures and significant bag reductions. These openings benefit only a limited number of commercial crabbers (7 during the 2011/2012 opening, 13 during the 2017/2018 opening) vs thousands of Juneau residents. The proposal also proposes a change to pots per person (with a 3 pot maximum) vs pots per boat. This is a common sense change that would save time and money for the Juneau sportsmen.

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc supports Proposals 224 / 225 which seek to return the commercial shrimp opening to October 1, or alternatively Sept 15, Sept 1, or Aug 15 (the alternate dates are 225 only). The rationale behind proposal 225 is a desire to let personal use fishermen have a reasonable chance at a successful harvest of shrimp. Since the move of the commercial shrimp opener from October 1 to May 15, many personal use fishermen have noticed a marked decrease in their shrimp catch from productive areas. This makes sense given that in many areas the commercial harvest is reached in under 2 weeks and shrimp are a slow-moving species. As such, it takes a number of months for areas to repopulate, leaving poor shrimping for personal use fisherman during the summer months.

Background: The spot prawn season was moved in 2022 from an October 1 opener to a May 15 opener. This proposal was made by the Sitka Advisory Committee (1) for the following stated reasons:
Biological. Shrimp have eggs during the fall season.

“Fishing during this time period may allow for increased guideline harvest levels in the future because the fishery would occur before the high natural mortality periods of molting, mating, egg development, and egg extrusion.”

* Counterpoints:

- this increased biological productivity doesn't do any good for personal use fishermen if they never get a reasonable opportunity to access the resource

The portion of the study on the “high natural mortality” that ADFG cites was a single study that used only 32 shrimp in 8 tanks (4 shrimp per tank) in a laboratory setting. It leaves much to be desired from a scientific perspective and is right at the absolute minimum for statistical significance. (Study is in photos of this post)

- It's interesting that ADFG is relying on this above mentioned study when other research cited in the most recent ADFG Southeast Alaska Pot Shrimp Status [prior to 2019/20 season] notes "a tagging study in Prince William Sound estimated a maximum age at 7 or more years. Additionally, examinations of size frequency histograms in Prince William Sound indicated maximum age to be at least 10 years." Given that ADFG relies on research that has Spot Prawns transitioning from male to female at 3-4yrs old, the 7-10yr max age doesn't imply a lot natural mortality related to egg extrusion.

(www.adfg.alaska.gov/FedAidPDFs/FDS20-19.pdf) p11/157

- Changing the season has no biological impact in the sense that you're still removing reproductive potential from the population. Imagine 2 female shrimp (shrimp A and shrimp B) on January 1. In both scenarios, the shrimp are releasing eggs in May. The only difference is you don't see next years eliminated eggs on the May harvested shrimp.

◆ Shrimp A lays its eggs in May and then is harvested May 15. ADFG cites the above-mentioned study to note that there will be natural mortality during the following months that you would not be harvesting.

▸ As egg release does not happen on a specifically defined period of time (but rather a range, like salmon runs or deer rutting), a portion of these shrimp with eggs will be harvested right before they release their eggs.

◆ Shrimp B lays its eggs in May and then is harvested October 1.

▸ All shrimp that had eggs in May have the opportunity to release their eggs in the spring.

"More opportunity for a local Market. Regional processors and catcher/sellers have expressed interest in a spring fishery as the tourist season provides more customers and restaurants are wanting shrimp."

* Counterpoint:

This doesn't make much sense. Most shrimp harvested in May are frozen immediately (as they were in October) as there is not enough of a local market, including tourists, to absorb the amount of shrimp harvested (the Region A 2023 harvest was ~421,000lbs and most of it was harvested in a 1-2 week period, depending on the district) . This is no different in May than it is in October. Furthermore, moving to a spring fishery puts SE Alaska Spot Prawns in direct competition with other Spot Prawn fisheries in Canada and Washington.

“Safer weather and more participation opportunity for smaller boats.”

* Counterpoint: Most of the commercial fleet is operating out of boats that can handle far more inclement weather than the boats run by personal use fishermen. If anything, the safety argument should be applied to having a summer fishery for the personal use harvest as many people are operating out of skiffs.

“A more viable product for US markets. Eggs cause the shrimp to decompose more rapidly and the orange mess is a turnoff to the American consumer.”

* Counterpoint: This is a reasonable complaint for those who do not handle their shrimp properly, though some fishermen had clearly figured out a solution prior to the change in season and sold to markets which covet the eggs. It’s not a reason to change the season though.

Given the exact 2022 Sitka AC proposal was also made by Lucas Bastian, a hunting guide on the Sitka AC, it's safe to assume the proposal originated with him. He probably would like to be shrimping in better weather and not having it run up against his fall bear guiding season. Those are understandable issues for him, but not reasons to move the season and effectively reallocate the fishery to commercial users.

In addition to the proposal(s) to change the season, proposal 222 by ADFG to close shrimping in Region A (Southeast Alaska) to all types of harvest (commercial, sport and personal use) from March 1 to April 30. We support this proposal because these are shrimp we know are going to be releasing eggs. But it’s troubling because it leaves only a 14 day window for personal use fishermen before the resource is temporarily depleted in productive areas.

PC499

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc supports proposal 210 by ADF&G with the amendment to isolate this reduction to non-resident anglers for pelagic rockfish bag and possession limits. As noted by ADF&G in this proposal, the increase in harvest of pelagic rockfish has increased in Southeast Alaska and specifically in the Sitka area by charter (guided) anglers. Harvest management approach for pelagic rockfish in Southeast Alaska needs to be segregated similar to DSR rockfish management with non-resident (no retention) and resident bag limits.

PC499

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc supports proposal 206. Residents don’t have anywhere near the same impact as charter and commercial fishing. The closure was initially enacted to due to stocks declining due to

commercial fishing and charter based sportfishing (70% of the sport take was from Sitka and Ketchikan – both charter sportfishing centers— from 2013 – 2017). Yelloweye populations can stand limited resident take; if we look at King Salmon and Black Cod as proxies (using resident sport and personal use statistics), residents are responsible for ~3% of the harvest. Residents should not have to shoulder to the conservation burden – especially when many of them don’t actively target yelloweye or live near a sportfishing charter center where stocks may have been depleted by commercial and charter fishing. (<https://www.arlis.org/docs/vol1/ADFG/SF-SP/2019/SF-SP19-09.pdf>)

PC499

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc opposes proposal 203. Unguided anglers services are growing increasingly popular as a way to avoid guided angler restrictions. . Lingcod, as with all other fish, are coming under increasing pressure from the bare-boats / unguided anglers. Loosening regulations for non-residents would only increase the pressure on this species and would have a negative conservation impact

PC499

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

TSI supports proposal 192. Allowing longlining of personal use pots will reduce the amount of gear in the water and buoys on the surface, ultimately reducing the risk of marine mammal entanglement and gear loss due to incidental vessel contact. It will also enhance safety by limiting the amount of time needed to haul multiple sets in inclement weather.

PC499

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

TSI supports proposal 165. This change will reduce conflict between sport anglers and commercial fisherman. It will also allow personal use pot fishing for shrimp and crab on weekends without the hazard of losing gear due to tangling with drift nets.

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc supports proposal 164 as we believe resident sport fishermen should have priority in the Terminal Harvest Area for king salmon, especially in light of failing local wild stocks and constant intense pressure from the growing charter industry.

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen Inc opposes proposal 156 as Juneau's local hatchery, DIPAC, uses proceeds from chum salmon to support King, Coho and Sockeye enhancement directed at local sport fishermen. As such, reducing the permitted chum salmon take would directly negatively impact Juneau area sport fishermen.

Submitted by: Nicholas Orr
Territorial Sportsmen Inc

Community of Residence: Juneau

Territorial Sportsmen supports proposal 139, as a prohibition of snagging in Statter Harbor is means of unifying CBJ Docks and Harbors policy and State of Alaska fishing regulations. The proposal is common sense and eliminates discrepancy between state regulation and long-time harbor policy.



Kevin Ryter
The Lodge at Whale Pass
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 404-405-8485

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 Box WWP
 Whale Pass, AK 99950
 907-846-5300

January 14, 2025
 Kevin Ryter, Lucas Ryter
 Owner

Re: Public Comments in support of maintaining or increasing allocations to non-resident guided fisherman.
Proposals Supported: 108, 113 **Proposals Opposed:** 109, 110, 111, 114, 115, 116, 119, 120

- **Remote** adventure travel lodge in Whale Pass on Prince of Wales Island
- **Established in 1988; under current ownership for 22 years**
- Host up to **30 high net worth guests** daily spending an estimated **\$1,500+ each per day** in the Southeast Alaska economy
- provide **Employment for 25+** on site per season, average of **25% live in Whale Pass**
- Over **\$4000,000 spent directly with local vendors in 2025**
- Operate on **4 charter boats** utilizing **4 Charter Halibut Permits**

Trends in the Eco-/Adventure tourism industry have increased the value of the King salmon resource allocated to guided non-resident anglers by a factor of four to six times in the last two decades. Twenty years ago, we hosted groups comprised of all anglers, fishing all day in high production areas aiming to box lots of fish. We now welcome mostly groups that average 2 anglers for every 8 to 12 guests. Critically, the King salmon fishery remains a major draw for those 2 anglers and thus a material driver for the whole group choosing to come to Alaska. Only 10% to 25% of those in the group are focused on fishing.

While the number of sport fishermen per group are less, the demand from such groups has grown exponentially. The economic impact to Alaska is multiplied from the same allocation of King salmon to non-resident guided fishermen driving four to six times as many visitors with the same or less pressure on the fishery.

Reduction to the limits on King salmon or increases in the uncertainty of inter- and intra-season changes for non-resident anglers threatens Alaska's loss of these types of groups, likely the largest and fastest growing share of the market. The economic impact this trend is driving is much bigger than anything seen previously for the King salmon resource and is the key to preserving the sustainability of the fishery; protecting Subsistence, Personal Use and resident access; providing for the continuation of commercial and native interests; and optimizing future state tax revenue and employment income earning potential.

Please see the included addendum for expanded comments.

With Regards,

Kevin Ryter

Addendum: Expanded Comments

- The composition of Alaska's adventure/sportsman visitors have shifted significantly over the last three decades towards those seeking a diversity of experiences and away from those focused primarily on hunting & fishing.
- Alaska, with its diversity of adventure experiences, is uniquely positioned to benefit from these trends.
- The allure of catching a King salmon as a marquee experience in a basket of outdoor adventures differentiates Alaska and materially drives Alaska tourism.
- Today's charter fishing excursions are full of non-resident King salmon anglers that are spending considerably less of their total time in Alaska fishing than in years past who bring with them significantly more travelling companions that are enjoying a broad range of Eco-tourism activities
- Thirty years ago, the typical group of six non-residents with fishermen brought economic impact primarily to their lodging operations and the charter fleet. They would all fish every day to bring home two or more King salmon per person - at least twelve King salmon harvested to attract the concentrated economic impact of six visitors.
- The typical group of six non-resident lodge guests today is comprised of individuals with interests in a broad set of adventures who often travel to several spots in the states. They spend their days doing a variety of activities and committing less than eight hours to fishing per person over a five day stay. On average they keep ½ of a King salmon per person. Thus 12 King salmon support four or more times as many visitors - 24 visitors creating economic impact over five days across the state against the 12 King salmon brought home.
- Industry trends are driving four to six times increases in groups like these, filling lodges, hotels, cruise ships and similar destinations.
- The hospitality industry anticipates this decades long trend to continue for the foreseeable future.
- The 2024 non-resident retention allowance for King salmon was the bare minimum needed to attract those decision makers that choose Alaska for their shots at the fish and bring the groups of mostly non-fishermen with them.
- Reduction in the current allocation to non-resident anglers will result in a drop in the economic impact from the King salmon fishery and possibly start a downward spiral in our eco-tourism industry. Uncertainty caused by mid-season changes to limits will have an equally negative effect.
- It seems inarguable that the economic impact generated by the Alaska hospitality industry and created by these trends, including tax revenues brought into the state, jobs created for Alaskans, and visitor money spent (which for our guests averages over \$1,500 per person per day) is not just the path towards optimization of dollars, but best supports the achievement of goals for the commercial, resident, Subsistence, traditional and Personal Use anglers.
- Added benefits are gained by the modern-day Adventure Traveler's: interest in the local culture, cooperative tourist ethos - not a competitive participant; advocacy of sustainable ecosystems; lighter pressure on the fish resource; and non-extractive, lower impact presence.