

PC501

**Submitted by:** Nyle Thomas  
**Community of Residence:** Petersburg

I support 159 and 162. As a resident of Petersburg I agree with SSRAA proposal to help ensure the survive and escapement, of the crystal lake king salmon.

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PC501

**Submitted by:** Nyle Thomas  
**Community of Residence:** Petersburg

I oppose 188, 189 as a herring fishermen we are timed by ADFG on how long opening are, and by the biology of the fish is they are immature or spawn they are not worth retaining. 189 it is hard enough at times getting around a school of flighty fish with the current seine length we have.

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PC501

**Submitted by:** Nyle Thomas  
**Community of Residence:** Petersburg

I am opposed to proposition 156. It will directly have a negative effect, on my self, the salmon fleet, processors, towns and the region economically.

Oppose: prop 167 the current length has worked and see no benefit in changing the length.

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PC502

**Submitted by:** Paul Thomas  
**Community of Residence:** Auke Bay

Paul Thomas

Auke Bay, AK

Proposal 242 11A Red and Blue King Crab

I want to add my support to proposal 224 in section 11A.

Personal king crab fishing in section 11A has been put secondary to commercial red and blue king crab fishing in 11a for decades now. King crab limits in areas accessible to sport fishermen with their smaller gear and less weather-capable vessels should be supported if for no other reason than the safety of the fishermen involved. While the larger commercial vessels can reach almost any area, especially in the winter season, the personal use vessels are put at a much higher risk running outside of 11A to try and fish king crab. Allowing commercial king crab fishing again in 11 A will almost undoubtedly result in complete shutdowns of personal use again as it has in the past, with minor economic benefits to the commercial fleet but devastation to personal use fishing.

Allowing for the change in the number of pots per vessel for personal use will, I believe, also dramatically increase safety, especially in the winter season. By reducing the number of vessels and more than likely increasing the size of vessels adding to the safety of personal use permit holders. Multiple permit holders should be allowed to work together from one vessel for efficiency and safety, with pot numbers being set by the number of permittees rather than by vessel. Keeping 11A solely for personal use fishery will hopefully also add to the number of open days and eventually bag limits. Once again, increasing the safety of the personal use fishery by not forcing fishing or pot recovery during bad weather events, which can happen in the summer or winter season.

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**PC503**

**Submitted by:** Jay Thomassen  
**Community of Residence:** Petersburg

156 I oppose because we need all the fish we can catch. 168 I oppose aircraft use. 242 I oppose because I own a crab permit and need the revenue to survive. 251 I oppose changing the start date because of missed opportunity to for salmon fishing 260 I oppose closing this because of missed opportunities. 204 I support for more small boat opportunities 228 I support for more small boat opportunity 236 I support this because storing gear in shallows is dangerous 237 I support this because this area is hard to fish 238 I support this. 239 I support this 240 I support 241 I support this for bait fishing 248 I support this 252 I support this 258 I support this

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**PC504**

**Submitted by:** Jonathan Thomassen  
**Community of Residence:** Seward, AK

Proposal 242 is what I am most concerned about. I am a commercial fisherman that makes a living fishing in southeast Alaska and other portions of the state. I understand that subsistence is important to consider for us Alaskans to thrive but sport use in 11-A takes advantage of the subsistence use king crab in ways that I do not support. Personal use means you go catch your one crab and go home, not you go catch yours, your neighbors, you cousins, your lodge guests crab. I agree subsistence should be allowed but not in the capacity it is now. We commercial fisherman have to purchase permits to have the right to fish these crab in the quantities the “subsistence” fisherman are already taking and I believe it to be wrong. This area is important to us fisherman for more than just use but to allow us to have the required biomass to fish in other areas. There are a lot more Red king crab in Southeast as a whole than their biomass predicts to be, we will never be able to show that if we never get to fish it.

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**Submitted by:** James Thomsen  
N/A

**Community of Residence:** Haines

#156- I'm opposing this proposal because if 20% egg reduction is enacted DIPAC will eventually no longer be able to afford to release hatchery fish in Lynn Canal and will devastate our commercial fishery. I understand we could use a reduction but not at the cost of so many jobs and a young fishing fleet trying to make a living in today's world. I wasn't fishing when fish and game totally mismanaged our natural Chilkat chum run but they devastated it leading to the extended production of hatchery chum. I don't want to be punished for previous generations' mistakes. We need enhanced fish.

#165- I support changing start times for openers. Sundays suck and starting at noon just wastes the whole day away, morning would be much more desirable, 8am is my support.

#230,231- I fully support a commercial squid jig fishery, the more opportunity to make a living the better in our state the better.

#157- yes I support a common property Burnett Inlet.. make more area and time accessible to everyone.

**Submitted by:** Kenneth Thomsen  
**Community of Residence:** Haines

I OPPOSE proposal 156 as a reduction in salmon row take would greatly hinder future hatchery stock numbers and potentially destroy commercial fisherman's ability to make a living doing what we love. Additionally there is so substantial scientific evidence to support the idea that hatchery fish are out competing natural stock salmon in terms of feed resources out at sea. I have seen natural stock sockeye, coho, and chum make a tremendous comeback in recent years and have even had record sockeye numbers return as recent as just two years ago.

I have a proposal if the state of Alaska wants to consider a new idea to minimize the number of natural salmon species being caught and maximize the number making it back up the rivers and spawning... The proposal would be to offer a buy-back program of various commercial salmon permits, such as driftnet, seine, troll, etc.

Offer a price that is double what the current market price is for any given permit to offset the drop in price over the years and to be fair for what the permits are actually worth. It would help the fisherman who do sell back, have some time and money in their pockets to decide a new line of work. It would also incentivize more people to sell their permits back to the state.

Once the permits are back in the state's hands. The state could decide what percentage of the permits they want to terminate for good or just hold for a number of years to allow natural stocks to continue to climb back to healthy numbers.

I guarantee a large percentage of fishermen would take this offer and everyone would benefit in the long run including the fish.

I'm not sure how to submit a formal proposal but I hope this idea or a version of it is taken seriously into consideration.

Thank you

Kenneth Thomsen

F/V Saltshaker 44172

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**PC507**

**Submitted by:** Luke Thorington  
**Community of Residence:** Juneau

Hello my name is Luke Thorington and I am submitting these comments regarding proposals 230/231 proposing a magister squid small boat commercial jig fishery in Southeast Alaska waters.

I am 36 years old and have been commercial fishing for close to 15 years. I purchased my first fishing boat and Southeast Alaska gillnet permit in 2019. Since that time I have not only witnessed a dramatic decline in the value of my permit, boat and product but also a decline in opportunities available to fisherman, especially those who own small boats and are just starting out doing what ever they can to get their foot in the door.

Not that long ago anyone with a boat had the opportunity to earn income in a number of open access fisheries in Southeast Alaska. For small boats you could longline halibut, black cod, and rock fish. Those fisheries have either been turned to a limited entry quota system with a prohibitively high price to entry or have basically been eliminated all together in the case of rockfish. If in the not so distant past you owned a fishing permit suitable to a small boat such as troll or gillnet you had far greater fishing opportunity as well. In recent years I have watched the king salmon quota be reduced dramatically for the troll fleet effectively eliminating spring kingsalmon fishing, as well as a determined effort by some to take away the troll fleets king salmon opportunity completely. I have watched the area and allotted fishing time for the gillnet fleet become more and more restricted making it more difficult and some years almost impossible to earn any kind of worth while income in the gillnet fishery.

My goal in writing this is not to point the finger at fisheries management. I understand that our resources need to be managed and protected so that future generations may have an opportunity to enjoy and harvest them either through sport or commercial methods. But when I see a resource like magister squid that appears to have the bio mass and potential demand to create a viable and possibly lucrative commercial fisherie, not just in Southeast but all around the coastal waters of the state, I see an opportunity that cannot be ignored. I see something that has the potential to allow young fisherman, that may not have the means of others, to create there own opportunity without the limiting factors of permit cost and shrinking fishing opportunity. I'm not stating that this is the answer to young small boat owners troubles or the breaker of the barriers for many who would like to be participants in the commercial

fishing industry. But I think that it is glaringly clear that this is something worth exploring and extending the opportunity for others to explore in the form of a recognized commercial fishery.

It is also very important to note how much of an important supplement to commercial salmon fishing these squid could potentially become. It seems that the abundance of these squid increases during warmer ocean temperatures or is at the very least not diminished. During 2016-2019 the sightings and catch rate of the squid seemed to increase. These years were during the fallout from the what became known as the blob where almost the entire Gulf of Alaska became a super heated mass of water for a number of years. This resulted in less nutrient rich water and serious ecological changes, one of which being a serious decline in most salmon runs south of the Aleutian chain. There has been an undeniable trend of a warming ocean, with northern latitudes showing the most dramatic changes. It is possible that disastrous salmon runs could unfortunately become a more common occurrence. We need to explore other options not only to mitigate the current loss of opportunity but to prepare for the possibility of a much more dramatic loss in the future.

From what we know about this resource, magister squid, they appear to be a highly abundant and resilient species. I would imagine that a serious demand could be created with little effort and has already been explored with success by Richard Yamada. After experiencing the crash of salmon and sablefish and watching what certainly appears to be a steady decline in halibut stocks, how can the state afford not to put some research and effort into exploring this fishery? Or at the very least create a commercial fishery and allow commercial fishermen who want to make their own investment of time and money do the exploration.

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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 Arther Thurn. I am a commercial fisherman. I have gillnetted in South East Alaska since 1980. It isn't possible for commercial gillnetters or seiners to survive without hatcheries. Farmed fish and Russian salmon have lowered the prices of fish to much less than they were in 1980. We simply have to have the steady volume that hatcheries provide. I do believe that wild fish conservation should always come first. I believe that Fish and Game has done a very good job managing our fisheries. Let them make the management decisions not Proposal 156.

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.

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for 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.

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

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

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

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure. For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

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

Sincerely,

Arthur "Don" Thurn  
F/V Skibo

**Submitted by:** Jennifer Thynes  
**Community of Residence:** Petersburg Ak

I oppose 242

I support 243 this will be a good tool to get information while giving much needed income for a hurting fleet

**Submitted by:** Theodore Thynes  
**Community of Residence:** Petersburg

As an Alaska resident this is not to benefit Alaskan residents. I've watched fish box after fish box of subsistence be sent home buy non -residents . Tired of it .....

**Submitted by:** Derek Thynes  
**Community of Residence:** Petersburg

Proposal 182-

I oppose a pound fishery under the Sitka sac roe permit there is already a northern pound permit if anything an unused part of Sitka quota should be allocated to the northern pound permits

188

I oppose 188 because it would affect herring pound fishery as well. we only get 4 days to fish this proposal would drop us a day and at times there are only herring are at night so 8 hours is too little .

189

I oppose this seine reduction because in the herring pound fishery many times we trying to catch small schools and half the net drops success rate by half

250

I support my proposal to reduce personal use to 6 1/4 the west coast has done this for decades and has worked with a 6 inch minimum for sport I don't believe that this will effect the biomass much and help people get their crab during commercial seasons without having to close areas to commercial possibly opening a few back up.

**Submitted by:** Brent Tingey  
**Community of Residence:** Juneau

I strongly urge the board to support proposal 242 in order to preserve unit 11A as a personal use area for the benefit of local residents of Juneau. There are very few areas that we, as residents, can fish without seeing numerous commercial pots. Some areas need to be protected from overfishing by commercial fisheries and 11A is one of them.



**Submitted by:** Gregory Tingey  
**Community of Residence:** Juneau

Proposal 242

I support this proposal. It will enable the king crab population to flourish as opposed to being decimated by commercial fishing. My family and I look forward to the 11 an openers for King crab and consider it a tradition. Please Keep it closed To commercial crabbing.

**Submitted by:** Chad Titell  
Alaska Native Brotherhood Camp 1

**Community of Residence:** Sitka

My name is Yandakin Yeil Chad Titell, Seargeant-at-Arms for the Alaska Native Brotherhood Grand Camp. We have talked about this issue at Grand Camp and Grand Camp members have agreed that we will support Indigenous harvesters and Herring Protectors in any way that we can.

The way of life in Sitka is herring. Without our herring, there is no culture, there is no food for anyone, there is no community. Protecting our way of life is what the Alaska Native Brotherhood stands for on both the local camp and the Grand Camp level.

How does one measure the value of a traditional food? The herring are sacred to us for a reason, along with the ooligan. They're not just a food source for us, they're a way of life.

When the herring come, we know it is time to begin putting up our food. It sets the tone for when we start our timeline for when to start gathering food for winter. Most people don't realize how much their ancestors relied on traditional foods versus the new western foods.

What will our future generations have to hold onto if this is lost? Everything revolves around the herring.

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.

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**Submitted by:** Tom Traibush  
**Community of Residence:** Gustavus

My comments on proposal 250.

To Whom it concerns;

I am opposed to reducing the size limit on Dungeness crab for sport and personal use.

Reducing the size limit from 6.5 to 6.25 inches for Dungeness would basically take away a full year of reproductive activity from that crab being harvested.

A 6.25-inch male crab is a mature breeding crab and will not enter the fishery for another full year. These recruits are totally necessary to sustain the fishery. Two years of breeding maturity ensures the health of the stock.

The sport and personal use fishery harvest occurs mainly in the summer months and harvesting this crab before the females molt and clutch in late summer/ early fall could result in a considerable reduction to the biomass. These recruits are crucial to the fishery and the health of the stock.

Thank You

To Whom it concerns;

I am in strong support of proposal 251, to move the start of the commercial Dungeness season from June 15 to July 1. It is my proposal.

I started Dungeness fishing in the early eighties and have seen a lot of changes within the fishery over the years.

The Board has long history of adjusting the Dungeness seasons for the protection of the resource.

In the mid to late eighties, BOF changed the Southeast Commercial Dungeness multiple times. On one of the shellfish cycles BoF changed the season by closing districts 1,2, and 13B to summer harvest, only allowing commercial Dungeness fishing October thru February. The reasoning was to protect the resource, as they tend to be soft at the start of the summer season.

In the early eighties the Dungeness season was June 1 thru February 28. The BOF, at the recommendation of the ADF&G, changed the season to a July 1 opening. (Reason being to help in reducing handling of soft shell crab.)

The 1985 Dungeness season was changed to June 15 thru August 15 and re-opened from October 1. The six-week closure was to take commercial pressure off the crab during the female molt and breeding cycle.

The BOF further shortened the season in 1989 by reducing the fall/ winter season from Oct.1 thru Feb.28, to Oct.1 thru Nov.30 in all the districts except for districts 1,2, and 13B. Districts 1,2, and 13B are allowed to fish October thru February as they have no summer season.

In other Dungeness fisheries in California, Oregon, Washington and B.C. preseason surveys are conducted prior to the crab openings. This allows the respective departments and agencies to manage the stock and, delay, when necessary, the opening when the crab is still soft and in this vulnerable state. This helps to ensure a healthy stock as well as a quality product to the market.

Pushing back the start date to July 1 will allow the crab to harden up and have much less handling of soft crab. Further, we will have a better-quality product to market. This will not have much impact on the overall harvest as most of the crab harvested in the summer fishery are caught in the first 2 to 3 weeks as evidenced by fish tickets. Any crab that are left-over could be caught in October.

The intent of this proposal is to further protect the resource and to ensure a continued maximum sustained yield.

To Whom it concerns;

I am for proposals 253,254,255,256, and 257, that would allow commercial pot shrimp fishing during the 14 days prior to the opening of the Dungeness fishery.

I submitted #257.

There is no gear conflict between the two fisheries as each fishery has unique definitions and regulations as to each type of pot. A legal-size crab cannot fit through the tunnel of a legal shrimp pot. Also, enforcement should not be an issue as the shrimp grounds and crab grounds are very different. Further, all Dungeness pots are required to have bouy tags specific to the permit holder and number of dungie pots per permit.

Thank You.

Tom Traibush

To Whom it concerns;

In regards to proposals 260,261, and 262,

I am not for them as written.

Unfortunately, the regulations for sport and personal use do not establish a priority for local (resident) users. If the areas proposed were for Southeast Alaska residents only, I would be much more supportive.

The problem for me is all the areas the BOF has set aside for sport/personal use, tend to benefit sport lodges and non-resident fishermen disproportionately to the locals who are submitting the proposals.

If BOF could establish areas that were locals only, (no charter boats guided or unguided and resident only) the need for some of these areas would be greatly reduced and local residents would be able to harvest the resource without competition from outside intrrests.

Thank You.

Tom Traibush

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January 14, 2025

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

**RE: Public comment Proposal 156**

Chair Carlson-Van Dort and Board Members:

**Trident Seafoods opposes Proposal 156.** Trident Seafoods operates a shorebased processing plant in Wrangell. This plant serves independent commercial salmon fishermen and provide critical tax revenue and commercial activity to the community.

We have continued to invest heavily in our Wrangell infrastructure. Our investments are predicated on the commitment by the State of Alaska to manage according to science-based principles and for sustained yield. There are significant risks involved in seafood processing, many of which are out of our control: run fluctuation and environmental variation; market value and global trade policies; and geopolitical conflict, as a few examples. The balance to these risks is a management system that uses science and deliberative decision making to inform policies that ensure the long-term sustainability of and access to the resource.

It is for these reasons that Trident Seafoods strongly opposes Proposal 156. Proposal 156 fails to demonstrate any evidence that a reduction in egg take in Southeast will lead to a conservation benefit in or outside of Southeast Alaska and no evidence to show how such a reduction would not be immediately subsumed by increased production in Russia and Japan. Proposal 156 likewise ignores the science-based approach that ADFG takes in managing hatchery production and operation.

This lack of evidence and benefit is juxtaposed against the very real and definitive harms that will follow should the Board adopt Proposal 156. Reducing egg take in Southeast will directly hurt the independent fishermen, processors, communities, and support businesses that rely on hatchery-directed fishing opportunity during the salmon season. This negative impact will come at a time when many fishing and processing businesses and communities are reeling from two consecutive years of historically poor economic conditions. Further losses will drive some businesses to close and greatly impact community and school programs.

Uncertainty regarding impacts and management will always exist. We depend on the Board to weigh this uncertainty against the known harms and the scale of impact when considering any management action. Here, the balance clearly shows that the harms cause by Proposal 156 are certain and drastic, while the benefits are undemonstrated and the impacts minimal. We therefore urge you to reject Proposal 156.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Shannon Carroll".

Shannon Carroll  
Director, Alaska Public Affairs

**Submitted by:** Jason Burke  
True north industries llc

**Community of Residence:** Washington

134,156

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**Submitted by:** Chance Turinsky  
**Community of Residence:** Juneau

**Subject:** Support for Proposal #243 – Alaska Board of Fisheries

Dear Alaska Board of Fisheries,

My name is Chance Turinsky and I am a deckhand working in Southeast Alaska's commercial fishing industry. For several years, I've dedicated my career to this industry and have seen firsthand how important sustainable fisheries management is for both local communities and the livelihoods of fishermen. Unfortunately, I've not yet had the chance to participate in the Red King Crab fishery because it has remained closed throughout my time on the water. Meanwhile, sport fishing continues to harvest Red King Crab, creating a noticeable imbalance in resource allocation.

Proposal #243, presented by the Alaska Department of Fish and Game, is a much-needed measure to promote fairness and sustainability in the management of Red King Crab. This proposal ensures that commercial fishermen can safely and responsibly access this resource's harvestable surplus while maintaining a long-term focus on protecting the species for future generations.

The proposed three-month season extension is particularly vital. Extending the season allows commercial fishermen to operate under safer conditions, take a more deliberate approach to harvesting, and maximize the value of each trip. At the same time, it provides processors with a steady flow of products, directly supporting local businesses and economies throughout the region.

As someone who has chosen commercial fishing as a career path, I depend on equitable and sustainable policies to keep this industry viable. Commercial fishing is more than just a job—it's the backbone of Alaska's economy and culture. Proposal #243 strikes the right balance by supporting fishermen, processors, and the health of the resource itself.

I encourage the Board to approve Proposal #243 to restore fairness and allow young fishermen like myself to participate in a fishery that has been closed to us for far too long. This proposal is not just about access; it's about ensuring the continued strength and resilience of the fishing industry in Alaska.

Thank you for your time and consideration.

Sincerely,

Chance Turinsky

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My name is Jeff Turner. I have been commercial salmon trolling since 2001. Commercial fishing is a job which has allowed me to live a subsistence lifestyle in a rural community of Alaska. Sitka is my home and I live on my boat full time, year round. Aside from trolling, I also longline for halibut and black cod and dinglebar for lingcod. I do not own IFQ's, I fish quota for other people and I am able to fish for lingcod because it is not yet a limited entry fishery. Over the last 5 fishing seasons, I have had to constantly change and adapt how I fish to make a living. There have been a number of threats to the king salmon fishery all of which are superseded by proposals in this cycle of Board of Fish which look to permanently reallocate king salmon away from the commercial troll fishery. Commercial fishing is my livelihood, it's a business and it's hard to run a business with the amount of instability we have been experiencing as commercial fishermen.

Before the fishing season starts, it takes around \$50,000 before I can untie from the dock.

Broken out it looks like this:

- \$2000 in permits
- \$5000 in fuel
- \$1000 Safety equipment annual maintenance
- \$25000/yr in insurance
- \$3000 in troll gear
- \$15000 in longline gear

Those financial obligations all exist without knowing what the price of fish is going to be and if/when the fishery will be. I have no guarantees of income, it all comes over the rail of the boat, pound by pound of fish.

Aside from the financial obligations to get out of the harbor, I also need to find crew. As commercial fishing has become more unstable, it's become harder to find crew, let alone quality crew. The quality of crew deteriorates with loss of income, a decent wage means good employees and a safer operation. Before Covid in 2020, I had had the same 3 crew members for three years in a row. Since then I have had on average 9 different crew members each season. The last few years have been extremely difficult financially and no one wants to stick with it. The only fishery I can do by myself on my vessel is salmon trolling. So the idea that a commercial fisherman can diversify his way out of an economic situation is not as simple as it sounds. If I want to enter a new fishery, it still takes a permit, gear and crew. The cheapest permit on the market is a troll permit. And on the inverse if I wanted to get out of commercial fishing it would be near impossible to divest of my boat and permit. There are a lot of boats and permits on the market, and not a lot of people looking to get into the industry.

There is a common narrative being stated that the commercial troll fishery has had reduced effort, therefore they do not need as much fish. There are a number of reasons for the reduced effort, and the cost of untying the boat is a big one. A lot of people have lost faith in commercial fishing as a viable career. Other threats include the Wild Fish Conservancy lawsuit, the Chinook ESA listing lawsuit, Pacific Salmon Treaty battles, and current threat of reallocation of the king salmon resource. Many old time fishermen have been taking the opportunity to retire, it felt like time for them, but many of us, myself included, still have loans on our boats and are still in the

process of building our career. I am doing my best to adapt to the uncertainty and instability but there is a limit to what I can do.

The last few years I have been trying to rely less on trolling, mostly because of the fear of losing access to kings over all. If the commercial king opening is only 7-10 days and once per year and maybe not even happen at all, then it has made more sense to keep my boat as a longline vessel, rather than switching over the gear. But the price of blackcod and halibut has decreased as well since 2020, so I cannot rely solely on longlining to make income. I now fish more king salmon in the winter than I do in the summer because it is open. The summer king salmon opener is more like a lottery. I have shifted away from it because of all of the anxiety of it. It's boom or bust. If you have a good opening then you have a good season and if you fail then you struggle the whole year. I have had to adapt and it's hard. I'm fishing more days per year to make the same money.

The money I make stays in Alaska. I am a full time, year round resident. Commercial fishing pays raw fish tax which goes directly into the city of the port of landing. That is paid on the ex-vessel value. As the opportunity to fish decreases, the city revenue decreases. The troll fleet is primarily made up of resident Alaskans who live in the state year round. We spend our money in our communities all year, and we live in some of the most expensive communities in Alaska.

I strongly oppose Proposals 108 and 113 which reallocate king salmon to a sector that has been overharvesting their allocation and growing unchecked. Conservation of the resource should be the priority and burden for all sectors and we should all have to maintain our businesses to live under the lawful allocations that we have had for 30 years. These proposals take king salmon allocation away from a fleet who is already struggling. We have been a limited entry fishery working with a fully allocated resource the entire time. We catch that full allocation almost every single year. The charter industry has no limit in growth, including the unguided bare boat charter sector. In the world of commercial fishing, if a sector grows to be too large or exceeds its allocation then it is limited. If it is not yet a limited entry fishery, it becomes one. It's time to look into the viability of a growing charter fishing sector and consider what the maximum sustainable size could be. These proposals are primarily written to serve the increasing non-resident take of king salmon at the hands of resident subsistence, sport and commercial fishing.

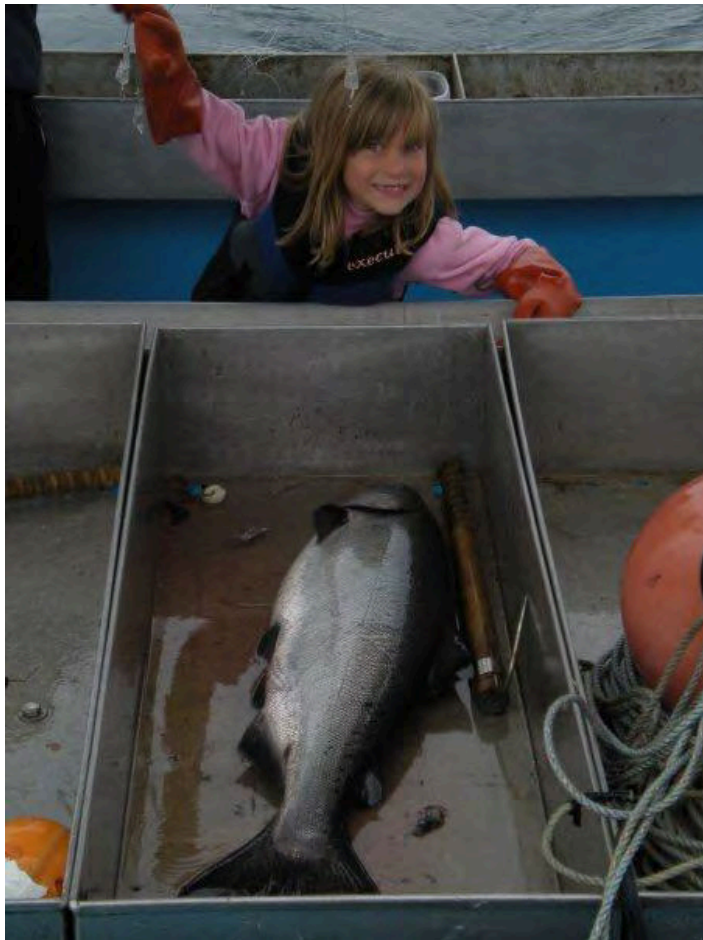
I strongly oppose Proposal 156 which aims to decrease hatchery production of pink and chum salmon by 25%. As the commercial troll fleet has had less access to king salmon, especially over the last 2 seasons when we did not have a second king salmon opening in August, we have become more dependent on hatchery chum salmon fishing. As I have mentioned before, the threats coming at commercial troll fishermen are immense.

I also strongly oppose Proposal 202 in the way it is being written. The current wording adds more confusion, not less. Better language would be, "Only one (1) troll gurdy wire can be deployed at any given time." The current wording limits the number of "trains" you can have onboard your vessel. The train is a leader that attaches to the gurdy wire, it is the gear used to fish. Having spare gear onboard is important as a fisherman. The lingcod fishery occurs offshore

in areas as far as 20 hours from town. If you lose gear, which often happens, you need spare gear onboard. The proposal aims to limit the ability to carry spare gear, I do not think that is the intent of ADFG, especially in an open access fishery that has a very short opener and an ever increasing number of participants.

- I support proposals 109, 110 and 111. All of these proposals have 3 major themes:
  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.

The troll fleet is looking for stability and an economically viable fishery. King salmon is the backbone of the fleet, it is the butter to our bread. Without king salmon or even a decrease in king salmon, trolling does not pay the bills, it does not allow for an entry level fishery that people want to get into, and it continues to deteriorate an economic livelihood and opportunity for rural, coastal Alaska residents. Thank you for taking the time to read these comments and I hope you can understand the importance of maintaining the current 80/20 allocation scheme.





**Submitted by:** Tyler Kraft  
Tyler Kraft Charters, Cascade Creek Lodge

**Community of Residence:** Sitka, Alaska

Dear Members of the Board,

My name is Tyler Kraft, I locally own and operate a charter fishing business (Cascade Creek Lodge) in Sitka with my 2 brothers. We grew up in Sitka as kids (1987-1995), my wife and I have been Alaska residents again beginning in 2015. My wife is school psychologist, who works for the Sitka school district, we have 2 children (4 and 2 months old), we are raising our children here, and plan on being life-long Alaskans.

I love fishing our waters. I'm so thankful for the high abundance of fish in our area. I strongly believe that sport fishing is the most ethical and sustainable fishery.

I sincerely believe further reduction or restrictions on king salmon for non-residents would cause May and June fishing trips and honestly early July in Sitka unmarketable for the charter fleet which would result non a disaster for the industry.

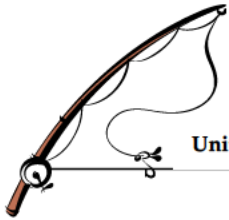
Naturally we have a diverse fishery, however in my experience most fishing guests would always put salmon as the most desirable fish. When groups have bad weather, high winds, seasickness, or both- it's really difficult to make it out for black cod and halibut, our only option is to tuck into protected areas and the only fish we can target realistically is king salmon. Since we only have the summers to run our business, I believe most charter outfits wouldn't have the means to potentially lose that many bookings.

Another consequence of non-resident king salmon reduction or restrictions is that locals that have family and friends in town and looking for a fun fishing trip for their guests, they unfortunately would have limited options for king salmon, especially for a proposed weekend closure.

In closing, I firmly stand that any reduction or restrictions on king salmon for non-residents would be a dramatically negative impact the charter industry and the local economy.

Thank you for your consideration- Tyler

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United Anglers of Alaska • P.O. Box 210064 • Auke Bay • Alaska • 99821 • PH (907) 723-0008



January 12, 2025

**RE: Support Proposals 230 & 231 To Establish a Commercial Jig Fishery for Magister Squid in Southeast Alaska**

Dear Chairperson, Van Dort and Members of the Board of Fish,

I am the author of proposal 230/231 which proposes opening Alaska's first commercial fishery for Berryteuthis Magister (B.Magister) Armhook Squid. I am a Southeast Alaska sportfishing lodge owner and have been for over 40 years. I have also been involved in fisheries management on the federal level as a member of MAFAC (Marine Fisheries Advisory Committee, who advises the U.S. Secretary of Commerce on Marine related issues), a member of the North Pacific Fisheries Management Council, Charter Halibut Committee, a member of the ADF&G Juneau Douglas AC for over 15 years and currently a U.S. Commissioner on the International Pacific Halibut Commission.

Opening a new squid fishery would have these benefits, first and foremost it would help local fishermen with a means to cope with climate change that has impacted their fisheries both in terms of abundance as well as market values domestically and globally resulting in severe reductions in annual incomes. Second, this would be a low-risk harvest opportunity of an underutilized renewable resource available to Alaskans that is highly valued and in great demand in other parts of the world as well as in niche markets domestically. Third, there is evidence that B.Magister may be an understudied predator that may be intercepting migrations of juvenile salmon on their journey out to sea. A recent eDNA study conducted by the NOAA Auke Bay Lab in Juneau found the stomachs of B. Magister to have a diet history of salmon as well as other commercially important species such as herring and cod fish. Since this species only lives for a year and are regularly caught weighing up to four pounds at the end of summer, describing B. Magister as a voracious forager would not be an understatement. Thus, a commercial fishery would provide a means to regulate the population of squid that may be impacting other important species that Alaskans depend on for food and economic livelihoods. Fourth, while means already exist to harvest squid in limited amounts, the average fisherman is not inclined to apply annually for these permits and does not have a reliable market to sell squid at a favorable price. The establishment of a new fishery would ease this process and open doors to markets that would otherwise be closed. I have been working on this project for several years now and was successful in receiving a NOAA fisheries grant to explore the market feasibility of a new Alaska squid fishery. While warming waters, ocean acidification, and rising carbon dioxide levels in our waters have raised havoc on many of our targeted commercial fisheries, this is an ocean environment that squid have evolved to thrive in. This may be contributing to the global northward migrations of squid populations in search of new food resources.

My research has found that there is a global shortage of squid. This has led some countries to over fish their squid fisheries and some that depend on imports of squid are facing geo-political barriers that are limiting their ability to acquire squid. My interviews with squid wholesalers in Japan as well as in our domestic markets confirm this market situation. The results of a market report by McKinley Research Group, which was commissioned in my study, also supported this conclusion of a worldwide shortage of squid and agreed this may be an opportune time for Alaska to enter the squid market.

I have met with major seafood wholesalers in the U.S. as well as Japan and have communicated with wholesalers as far as South America and the United Kingdom. While responses have shown high interest in our squid, the question at the end of our conversation is inevitably do you have a commercial fishery for squid in Alaska if not, how come?

So, this is why I'm here today to begin the process of providing an answer to that question. This could be a win/win for everyone in the seafood supply chain which help support vibrant local economies, and potentially provide a means to control a disruptive component of the ecosystem we have little information on. For these reasons I urge you to support this proposal.

Please visit our website: [www.magistersquidalaska.com](http://www.magistersquidalaska.com) for more information.

A handwritten signature in black ink that reads "Richard Yamada". The signature is written in a cursive, flowing style.

Richard Yamada

United Anglers of Alaska



# UNITED FISHERMEN OF ALASKA

**Mailing Address:** P.O. Box 20229, Juneau AK 99802-0229

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**E-mail:** [ufa@ufa-fish.org](mailto:ufa@ufa-fish.org) **Website:** [www.ufa-fish.org](http://www.ufa-fish.org)

January 14<sup>th</sup>, 2024

Alaska Board of Fisheries  
Board Support Section  
ATTN: BOF Comments  
PO Box 115526  
Juneau, AK 99811-5526

Re: **Support** for proposals 110, 180, 230  
**Opposition** for proposals 105, 108, 113, 156, 173-179, 181, 188-190, 242, 260

Dear Chairwoman Carlson-Van Dort,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 36 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast. UFA has taken position on the following proposals for the January 28<sup>th</sup> through February 9<sup>th</sup> Southeast and Yakutat Finfish Board of Fish meeting:

### **Proposal #105: OPPOSE**

UFA is opposed to proposal 105. UFA supports the distinction between management authorities, in this case the State of Alaska with ADF&G and federal management with the NPFMC. UFA recognizes the differential regulations that exist within State waters that do not exist out in the EEZ, but see this proposal as too broad and could lead to further issues with the sport management of fish that can be harvested in both State waters and the EEZ, particularly chinook salmon.

### **Proposals #108 and #113: OPPOSE**

UFA opposes proposals 108 and 113. UFA is opposed to any proposal which would result in the reallocation of commercial harvest to the sport sector. The sport sector has overharvested its allocation in the last two years and will continue to do so in future years if in season management structures are not put in place. The lack of in-season management allows the sport sector to harvest more than its allocation before the commercial sector has its second summer opening, which leads to reduced to no opportunity for the commercial sector. Proposals 108 and 113 seek to reallocate commercial harvest to the sport sector and fails to initiate in season management for the sport sector, which will place the continued burden of conservation on the commercial sector.

## AMEND and ADOPT King Salmon Management Plan

UFA supports an amended king salmon management proposal which incorporates a variety of factors contained in several different proposals. UFA would like to emphasize that modification to the king salmon management plan must maintain the allocation split of 80% troll and 20% sport and hold each sector to its respective allocation. Without management in-season for the sport sector it is a yearly reallocation to the sport sector, as it is highly unlikely that we will be out of the low abundance of Chinook salmon for the foreseeable future. To ensure that the allocation is maintained, ADF&G must have and exercise the authority to manage the sport sector's harvest in-season. The provisions that UFA believes are necessary in an amended king salmon management proposal include:

- UFA supports the 80/20% allocation split for troll & sport after deducting the net allocations, making any remaining net allocation available to the troll fleet during the second summer king salmon opening.
- Authority to ADF&G to make adjustments to the bag and possession limits in-season to maintain the sport sector to the allocation UFA supports eliminating the provision that averaged the sport fish allocation over time as this sector has grown significantly.
- The provision for two rods in the winter needs to be part of the baseline management measures.
- The word "sport fishery" should be reinserted throughout the plan where it was removed at the last SE Board of Fisheries meeting.
- UFA suggests moving the resident priority language up in the plan to emphasize the importance of this clause.
- UFA supports repealing the sunset language in the management plan as the plan comes up for revision every SE Board of Fisheries cycle.

### Proposal #156: OPPOSE

UFA is opposed to proposal 156. UFA is opposed to proposals that look to reduce hatchery output. There is very little evidence to show that there are negative interactions between hatchery reared and wild stocks in SEAK. UFA is very supportive of ongoing research by ADF&G to determine the impacts of hatchery straying on wild stocks and the management implications, but believe that such a large reduction in hatchery output at such a broad range would have deleterious effects to the harvesters, processors and communities that rely on the hatchery output, let alone the sport hatchery release that is supported through the harvest of hatchery pink and chums.

UFA believes that the BOF process is too broad of a tool to make adjustments to the PNP hatcheries in the State of Alaska. There is already an open and public process that can more prescriptively address concerns with hatchery output through the Regional Plan Team (RPT) process. UFA believes that making any potential adjustments to hatchery egg take or release should go through this RPT process as opposed to the BOF process.

**Proposal # 173: OPPOSE**

UFA 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. The goal of lowering the harvest rate can be accomplished through Proposals #171 & #172. Proposal #173's intent is most likely 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 which is not set up on a sliding scale as it is in the management plan.

**Proposal #174: OPPOSE**

UFA opposes proposal #174 to severely restrict the commercial Sitka Sac Roe Herring fishery when the fishery is sustainable. ADF&G has already submitted proposals for more conservative management, even when the stock biomass is at all-time high levels.

**Proposal #175: OPPOSE**

UFA opposes proposal #175, which would 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. Additionally, ADF&G has already submitted two proposals (#171 & #172) to manage the herring fisheries in Southeast Alaska in a more conservative manner.

**Proposal #176: OPPOSE**

UFA opposes proposal #176, which aims to reduce the herring 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**

UFA opposes proposal #177, which would 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 already manages the fishery conservatively and if proposals #171 & #172 are adopted, there will be more conservative management implemented.

**Proposal #178: OPPOSE**

UFA is opposed to proposal 178. UFA is opposed to the closing of waters to commercial harvest without indication or necessity for conservation concerns related to area closures. There are already significant closed areas in the sac roe fishery and there is no stock driven need to expand closed waters any further.

**Proposal #179: OPPOSE**

UFA is opposed to proposal 179. UFA is opposed to the closing of waters to commercial harvest without indication or necessity for conservation concerns related to area closures. There are already significant closed areas in the sac roe fishery and there is no stock driven need to expand closed waters any further.

**Proposal #180: SUPPORT**

UFA supports proposal #180. Proposal #180 is simply a housekeeping proposal and would 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.

**Proposal #181: OPPOSE**

UFA opposes proposal #181, which would limit the number of allowable test sets done per day and per season. ADF&G should have the ability to authorize test sets as they deem necessary in order to ensure that the Sitka Sound sac roe purse seine fishery is managed conservatively and sustainably.

**Proposal #188: OPPOSE**

UFA opposes proposal #188. Placing limits on allowable fishing time as proposed by #188 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. This proposal would also eliminate the potential for a winter food and bait fishery and spawn on kelp fisheries.

**Proposal #189: OPPOSE**

UFA opposes proposal #189. Proposal #189, if adopted, would reduce 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 ADF&G using a combination of time, area, and harvest restrictions. Reducing the length of a herring purse seine serves no conservation purpose and only causes inefficiency, requiring more sets be made to achieve the same GHL.

**Proposal #190: OPPOSE**

UFA opposes proposal #190 which would 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. Adoption of proposal #190 would fundamentally change and undermine the public process that has been used to refine the management process over time. UFA opposes any proposal which would deviate from the public process which provides all stakeholders with the ability to weigh in on the management process.

**Proposal #230: SUPPORT**

UFA supports proposals 230. UFA is supportive of the creation of exploratory fisheries that could be accessed by all user groups. This would provide more fishing opportunity to diversify for the commercial sector, particularly new entrants.

**Proposal #242: OPPOSE**

UFA is opposed to proposal 242. UFA is opposed to proposals that reallocate commercial biomass to other sectors. This proposal would reallocate the commercial sector's 40% allocation of section 11-A red king crab to the personal use fishery, which is already allocated 60% of the biomass. This reallocation would not only reduce the allocation of red king crab from the commercial to the personal use fishery in the most food secure area of SEAK, Juneau, it would likely lead to the permanent closure of the commercial red king crab fishery in SEAK.

The commercial RKC fishery is dependent on 7 distinct survey areas, with “Juneau,” encompassing 11-A, being one of the seven. When survey areas are removed, there is no mechanism to remove their historical influence on the harvestable biomass trigger that leads to a trigger. This means that the remaining 6 survey areas would need to produce more crab in order to support the same fishery, something that is likely not feasible given the current state of the population and management structures.

**Proposal #260: OPPOSE**

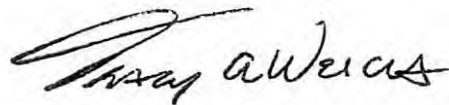
UFA is opposed to proposal 260. UFA is opposed to the closing of waters to commercial harvest without indication or necessity of conservation concerns related to area closures.

Thank you for your consideration of our position on these Board of Fish proposals and your service on the Board of Fish for the State of Alaska.

Regards,



Matt Alward  
President



Tracy Welch  
Executive Director

**MEMBER ORGANIZATIONS**

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association  
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association  
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen  
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel  
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture  
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest  
Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner  
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast  
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association



# UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 \* (253) 279-0707 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

Dear Chair Carlson- Van Dort and Board members,

United Southeast Alaska Gillnetters offers these comments for Action Plans and proposals for the Alaska Board of Fisheries Southeast and Yakutat Finfish and Shellfish meeting January 28- February 9, 2025.

**Taku and King Salmon Rivers Chinook Salmon Stock Status and Action Plan-** USAG is supportive of Option B. This option allows the department latitude to extend time starting statistical week 26 should there be good abundance of sockeye. Historically, sockeye production increases significantly stat week 27 and inclines from there. Alaska has struggled to harvest it's share of Taku River sockeye in accordance with Chapter 1 of the 2019 annex of the Pacific Salmon Treaty. The current Action Plan has played a role in this, managing for a weak stock. More time earlier would likely be helpful in alleviating this issue, and this option would allow for that.

Historical data from 1988-20 indicates by June 15, which happens to be the date our fishery will start the 2025 season, 83% of Taku River Chinook have reached Canyon Island, which is 30 miles from the river mouth. By June 27, 95% have reached Canyon Island. The area closures proscribed in Option B are adequate to protect the remaining small percentage of chinook left of the run. Our hope is that the department be granted latitude to lift some of these area closures in the event there is a strong enough return of chinook.

While we are in support of the gillnet section of this option, we are opposed to the closure of the winter troll from March 16 through December 31. We believe, and we think department data will affirm that very few Taku chinook are harvested in this fishery. This action would have no benefit to the objective of getting more fish to the river.

**Hugh Smith Lake Sockeye Salmon Stock Status and Action Plan-** USAG supports Option A. The department has the tools and the ability in hand to manage the two net fisheries to reduce harvest of Hugh Smith Lake sockeye. The department has already shown that they are capable and willing to close the areas that were outlined in the Action Plan of 2003 for the last 5 years. Weir counts will allow the department to assess early returns in season to the system, and they can adjust open areas and fishing time accordingly.

Option B is also acceptable, as it prescribes triggers to give guidance to the department for when to close areas for conservation, but we would argue that the department has already been doing this, and would likely take the same actions under Option A.

Option C calls for a definite closure for pertinent stat weeks when these sockeyes are migrating through fishing corridors. The problem we have is that should there be indications of a strong return, the department will be constrained from allowing prosecution of the fisheries, reducing harvest of other abundant wild fish stocks.

**Northern Southeast Outside Chum Salmon Stock Status and Action Plan, 2025-** USAG supports Option A of Action 4. The stated goal of the proposed plan is to reduce hatchery strays, and to reduce interception of NSEO chums. Cost recovery and common property seine fisheries in Crawfish take place later in the season, after summer chum are well into the creek, so interception of wild summer chum is not likely the issue.

To our recollection, SOC actions are to address reducing impacts to the stocks we are concerned with. Options B and C seek to reduce hatchery production, which somehow, is supposed to be helpful in increasing the chances of making escapements in streams that are many miles away. Generally, Action Plans associated with SOC's would reduce time and/or area in the distressed stocks migratory route. The Crawfish release site is located south of 7 of the 8 index streams, which, from our understanding of the typical migratory patterns in this area, would have no effect on escapements to those 7 streams.

Hatchery stray reduction is a new element for us in an Action Plan. There was vigorous discussion at the RPT regarding the permitting of Crawfish (which was offered by the department to NRSAA as a possible remote release), and a condition of the permit was aggressive cost recovery to reduce straying.

We feel it would be inappropriate for the Board to act on Options B and C. In the deliberations regarding Proposal 78 in the latest PWS meeting, the Commissioner stated the board did not have the authority to address permits. The chair of the meeting stated that Board actions on the issue would go beyond the statutory intent of the legislature. We believe both these statements are true, and that any permit alterations should be vetted at the RPT for the Commissioner for consideration, something he has also stated on the record he fully intends to do. The Board of Fish allocates, the Commissioner permits. That is how the processes work, and both bodies need to stay within their bounds.

**Proposals regarding Southeast Alaska King Salmon Management Plan-** USAG is supportive of the proposals which will maintain the current 80/20 allocative split, troll/sport after net allocations. We have members who participate in both fisheries. The allocations should be adhered to, and after the 2024 season, it is obvious to us that there should be in-season management measures taken in the sport fishery to maintain the allocative split. Lack of in-season management in 2024 allowed a sport catch well beyond their allocation, resulting in lost livelihood by the troll fleet (a fleet that has over an 80% residency rate of participants), and lost opportunity for residential sport users of the resource. The current management plan guarantees the same result in any year there is a high abundance and/or catch rate by the sport fleet. The non-resident sport fleet has grown in recent years, promoted by liberal bag limits January through June 15. A reduction in the bag limit in those months would be a good place to start for in-season management. Any unrealized allocation of the net fleets should only be available to the troll fleet, and only after it is determined that those allocations would not be met with the opportunity remaining in the net fisheries.

**Proposal 156- OPPOSE.** It is our contention that this should never have been accepted by the Board of Fisheries. This does not create a new regulation, nor does it offer to amend an existing regulation. It is giving a directive to the Board. The regulation used to platform this proposal has nothing to do with permitting, but merely what the allocative ranges are for the commercial users of enhanced fish. My guess would be that the proposer used this regulation as it was the only one that deals with enhanced fish. Regardless, we fail to see how amending this regulation would result in achieving the proposer's desire, as there is nothing in the regulation that relates to numbers of releases, or species.

The 25% reduction the proposer asks for appears to be arbitrary. There is no benefit indicated by the reduction in the proposal, just an unproven theory that the ocean capacity is stretched to the limit. I don't expect the proposer to have a scope of the economy of Southeast Alaska, given that he resides as far from the coast within the state as he possibly can. Our fleet, of which over 80% are residents, rely heavily on enhanced fish. The seafood industry is the only real resource extraction industry in the region and provides opportunity for working families that are vital to our economy.

We find it difficult to vilify Southeast Alaska hatchery production as impacting the Yukon River, when the Stock of Concern status for the Chilkat and Unuk Rivers have been lifted, and the Taku River has a forecast of 40000 kings for 2025. Natural fluctuations in wild salmon runs are common. In the seventies, there was a cycle of poor wild returns for all species in the region, long before hatchery production was common. That cycle was the impetus for the current hatchery program, to help stabilize production, which it has done quite well.

11 USAG members serve on the two regional and one private non-profit hatchery's boards of directors. We all realize the detrimental impacts such a large reduction would have on production. Chum cost recovery pays for operations. High-cost programs like chinook and coho will likely be reduced or discontinued entirely should there be a reduction of this magnitude. Losing those releases would have detrimental impact on commercial users, sportfishing residents and visitors alike.

**Proposal 157- SUPPORT.** All THA's should have an option for common property fish in excess of brood or cost recovery needs. There has been concerns raised that the area is small and restricted, and a common property fishery might be difficult to prosecute. We won't speak for seines, but gillnetting could be done easily enough. The minimum 6" mesh size would allow for pink salmon escapement in Navy Creek. Passage of this proposal would allow managers another tool in the box to maximize harvest of enhanced fish.

**Proposal 158- SUPPORT.** While adoption of this proposal will have no impact on our fishery, we are generally supportive of efficiency.

**Proposal 159- SUPPORT.** In recent history, there has been serious issues in collecting broodstock at Chrystal Lake Hatchery. CLH provides brood and rearing for Anita Bay chinook releases, which provides a terminal harvest opportunity for all commercial fleets, as well as opportunity for sportfishing for locals who have been marginalized in recent years, due to area closures to protect Stikine River chinook. This proposal will increase the chances for maximizing brood collection, particularly in low return years, to allow full releases.

**Proposal 162- SUPPORT.** Adoption of this proposal would eliminate late harvest of chinook in fresh waters of the Wrangell Narrows- Blind Slough Terminal Harvest Area. SSRAA is struggling to obtain

enough eggs for brood, and this would allow them access to everything, at a time there would be very minimal value in these fish for food. It would also decrease the bag limit when it is open to two fish. The Andrews Creek broodstock is used in at least two other hatcheries in the region. Securing brood at CLH is vital, not only for releases at Blind Sough, but also sport releases near Juneau and Sitka, should poor returns occur there. Specific releases call for specific brood, and if there is excess eggs collected at any of these hatcheries, they can help supplement shortfalls at the other hatcheries.

**Proposal 230, 231- SUPPORT.** We are supportive of development of any commercial fishery that would allow opportunity for our fleet. Successful fishing operations in the SE region have long relied on diversification. Most of our members are involved in other regional fisheries like Dungeness, shrimp, dive fisheries, and/or trolling. Our assumption is that if there were a market and a guideline harvest, there would be interest, as a jigging operation would be a good fit for our class of vessels.

**Proposal 165- NEUTRAL.** We have seen similar proposals in the past, and there has never been a consensus as to what day of the week to start on, or time. The Departments comments for this proposal is that it will have an effect on timely management if we were to start on Mondays, as catch data would be a day behind every given week. It seems like since there are still 7 days in a week, that could be accommodated easily enough. Processor perspective on what would be preferable for optimizing their workforce would be helpful in deciding start days.

We appreciate the opportunity to comment, and will be present at the meeting to participate in in discussions regarding these very important proposals and Action Plans.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', written in a cursive style.

Max Worhatch, Executive Director

**Submitted by:** Keriann Uno

**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. I oppose proposals 182 and 183.

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P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686  
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com



January 13, 2025

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

RE: Proposal 156 – 5 AAC 33.364 Southeast Alaska and Area Enhanced Salmon Allocation Management Plan

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

Thank you for the opportunity to submit comments on proposals before the Alaska Board of Fisheries (BOF) at the Southeast and Yakutat Finfish & Shellfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) provides the following comments **in strong opposition to Proposal 156**.

The VFDA was established in 1980 and operates the Solomon Gulch Hatchery (SGH) in Port Valdez. A 501(c)3 not for profit corporation, we exist to enhance commercial, sport, and subsistence fisheries in Prince William Sound (PWS). Although VFDA does not operate a salmon hatchery in Southeast Alaska (SE), given the parallels between this proposal and Proposal 78 heard at the PWS meeting, we are compelled to offer the following comments to oppose this proposal

Proposal 156, will significantly impact Southeast Alaska salmon hatcheries and the fisheries and communities that they support. The economic, social, and cultural benefits of Southeast's enhancement programs are vast and far reaching, arguably more so than in PWS, Cook Inlet, and Kodiak. Commercial fisheries and seafood processing provided for 3604 jobs in 2023.<sup>1</sup> Salmon made up 82% of the value of seafood that year, with salmon produced by Southeast Alaska hatcheries contributing 41% of the catch worth an approximate ex vessel value of \$41M.<sup>2</sup> Given the diversity of salmon fisheries in that region, including the troll fishery which is heavily dependent on hatchery chinook and coho releases to balance allocations between gear groups and satisfy treaty obligations, the stable production of hatchery produced salmon to financially support these communities is critical.

Future financial losses to regional fisheries from a 25% reduction of chum salmon production alone is estimated to be \$13M<sup>3</sup>. However, given the extended saltwater lifecycle of chum salmon and the variability of returns by year class, the impacts of this reduction may be much more harmful as hatcheries fail to achieve egg takes and/or cost recovery goals due to lower returns, particularly in years of weak ocean productivity.

Hatchery pink salmon production in SE is frankly de minimis in comparison to production by other regions of the state. This is an important observation when considering the request to reduce the production of pinks in Proposal 156. Total green egg takes by hatcheries there, estimated at 128M annually is <1% of the total combined 1.4B pink salmon eggs permitted to hatcheries each year.<sup>4</sup> To

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<sup>1</sup> Southeast Alaska by the Numbers 2024 – Southeast Conference

<sup>2</sup> ADF&G Regional Information Report No. 5J24-05

<sup>3</sup> RC 2 ADF&G Staff Comments for Southeast Meeting

<sup>4</sup> ADF&G Regional Information Report No. 5J24-05

further put this into perspective, hatchery operators have submitted multiple papers over the years showing that the total production of hatchery pink salmon is approximately 15%<sup>5</sup> of the total pink salmon abundance and less than .04%<sup>6</sup> of the total nekton biomass of the North Pacific. SE hatchery pink salmon production is almost un-measurable in the big picture. However, it is vital to several small hatchery programs in SE. Even a small reduction in permitted capacity for them will likely have a detrimental effect on the sustainability of those associations.

Proposal 156, along with others submitted by various authors over the years, have consistently been rejected because no evidence exists to show an empirical causal linkage between Alaska hatchery produced salmon, and the decline of wild salmon stocks including those of Western Alaska. The author recognizes this stating:

*“All those proposals have been refused on the basis of lack of conclusive evidence that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying.”*

No new evidence has been introduced in Proposal 156 to now show that a conservation concern exists. The author has shown no reasoning or basis to justify a 25% reduction to both pink and chum egg numbers in SE, nor provides any documented consideration of the negative impacts of the proposal to the stakeholders. A 25% reduction is completely arbitrary and capricious, and any attempt to reduce SE hatchery production under the guise of this proposal would be even more so.

VFDA would like to recognize that the board correctly weighed the lack of scientific evidence presented and the significant economic harm Proposal 78 in PWS would have caused when rejecting it by a vote of 1:5. Proposal 156 should also be rejected for these same reasons. This proposal is ill advised and reckless. It will harm Alaska’s hatchery programs in an attempt to conduct an experiment to try to increase Western Alaska salmon abundance.

Since the inception of private non-profit salmon hatchery programs, the state has relied on the application of robust scientific research to guide hatchery operations and permitting. The BOF has focused its regulatory responsibility on the allocation of enhanced resources and has never weighed into areas of hatchery permitting or production; the department has competently and sustainably administrated these functions. This separation of jurisdiction has served Alaska well and we urge the BOF to observe historic practice when considering requests from individuals for direct board intervention to limit or reduce hatchery production.

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on this proposal. **We would respectfully request that the board reject Proposal 156.** Thank you for your consideration.

Sincerely,



Mike H. Wells  
Executive Director

<sup>5</sup> High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate

<sup>6</sup> RC070 UCI BOF Meeting 2024

Ben Van Alen, Juneau

SUPPORT PROPOSAL 156 - a 25% reduction in hatchery releases of pink and chum salmon in Southeast Alaska.

Neither the hatchery operators nor the Department has provided information to help us assess if: 1) the more hatchery fish released the better; or 2) if there is an ecologic (and economic) niche for industrial-scale releases of “ocean ranched” hatchery salmon to help rebuild and enhance wild salmon?

There is no evidence the industrial-scale hatchery releases have helped rebuild, enhance, or sustain any population or stock of salmon in the region. Hatchery release efforts throughout the Region tend to show an initial peak in returns then years of highly variable and declining returns leading to challenges meeting brood stock, cost recovery, fishery contribution, and wild stock escapement goals. This is particularly evident for hatchery releases of Chinook, Coho, and Chum Salmon in the upper Chatham Strait area, where the largest (total fish released) hatchery in the region is located (Figures 1, 2, and 3). Survivals, returns, and harvests of wild and hatchery salmon have declined since hatchery releases exceeded around 450 million fish in the 1990s (Figure 4). The data suggests that ocean ranching hatchery fish is not sustainable. The data suggests that returns would be higher if hatcheries were not releasing fish.

Ecologically, it is reasonable to assume that hatchery releases supplant wild salmon rather than supplement them. Ecologically, it is reasonable to assume the put-grow-and-take basis of production hatcheries results in unsustainable nutrient mining, ecological overshoot, an inability to sustain or rebuild wild salmon populations, and even an inability to sustain hatchery returns. We must question the ecological niche for hatchery fish since they are so ecologically different from wild salmon and since sustaining wild salmon populations and the fisheries depending on them is our highest priority. How can hatchery fish help wild fish?

As a fish biologist I caution that there is not a big open niche in the ocean for rearing millions of hatchery immigrants. Hatchery immigrants compete for space and food with wild salmon, spawn with and reduce the fitness and biodiversity of wild salmon, and their growth and commercial harvest consumes more biogeochemical resources than they recycle. This contributes directly to ecological overshoot and to the declining or depressed populations of wild salmon, Pacific herring, and eulachon now observed wherever there are production releases of hatchery salmon.

Poor survivals of wild salmon results in low harvests, low escapements, low marine-derived nutrients, low system productivity, low brood-year returns, and years, or decades, of fishery restrictions to rebuild escapements and returns. This hatchery-induced production collapse is both expected and avoidable. We should expect it will take years or decades to erode the carrying capacity with hatchery releases, and years or decades to rebuild the carrying capacity with wild spawners. The rebuilding of wild salmon populations is impossible with continued production releases of hatchery salmon. Salmon hatcheries have no place in sustainable salmon management. A 25% decrease in releases is fully justified.



Lastly, the State of Alaska has a ‘sustained yield principle’ for natural/wild resources mandated in Article VIII of its Constitution. In 2000, the State of Alaska adopted the Sustainable Salmon Fisheries Policy regulation (5 AAC 39.222) for wild salmon stocks and their habitats that incorporates a ‘precautionary approach’ to manage salmon stocks, fisheries, artificial propagation and essential habitats conservatively in the face of uncertainty. Alaska also has other regulations (i.e., 5 AAC 39.220, 39.223, and 41.030) mandating a priority to wild stocks and their habitats. In 2005, Canada adopted ‘Canada’s Policy for the Conservation of Wild Pacific Salmon’, which also incorporates a precautionary approach. The precautionary approach, or precautionary principle, has been used and adopted worldwide in efforts to protect the environment and biological diversity since the 1990s. The precautionary approach needs to be applied to the permitting of salmon hatcheries.

## Hidden Falls Hatchery Chinook Boom and Bust

A pattern?

- Returns Peak
- then
- Returns highly variable and declining
- and now
- Challenges meeting Brood Stock and Cost Recovery goals despite
- Huge Releases

(Source: [www.adfg.alaska.gov](http://www.adfg.alaska.gov) )

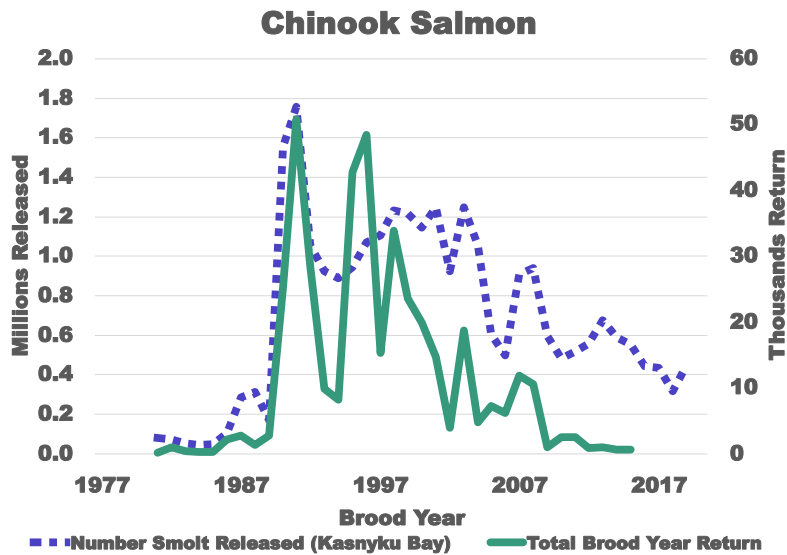


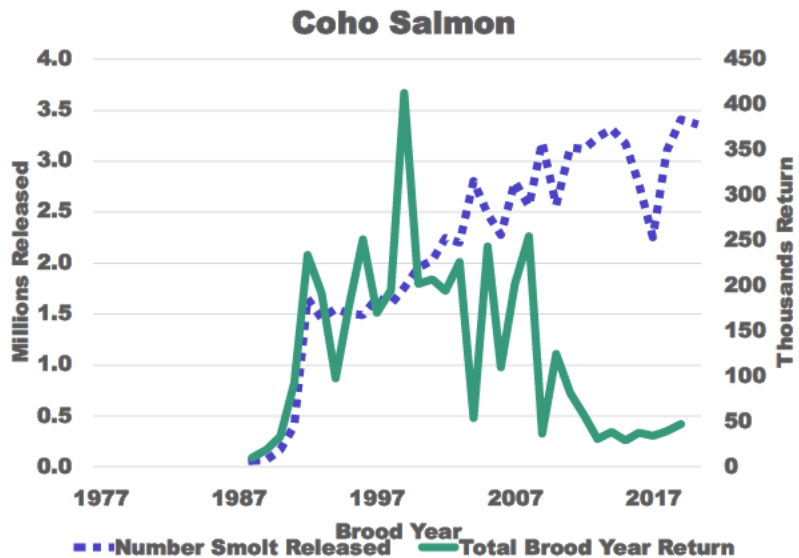
Figure 1.

# Hidden Falls Hatchery Coho Boom and Bust

A pattern?

Returns Peak  
then  
Returns highly  
variable and  
declining  
and now  
Challenges  
meeting Brood  
Stock and Cost  
Recovery goals  
despite  
Huge Releases

(Source: [www.adfg.alaska.gov](http://www.adfg.alaska.gov) )



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Figure 2.

# Hidden Falls Hatchery Chum Boom and Bust

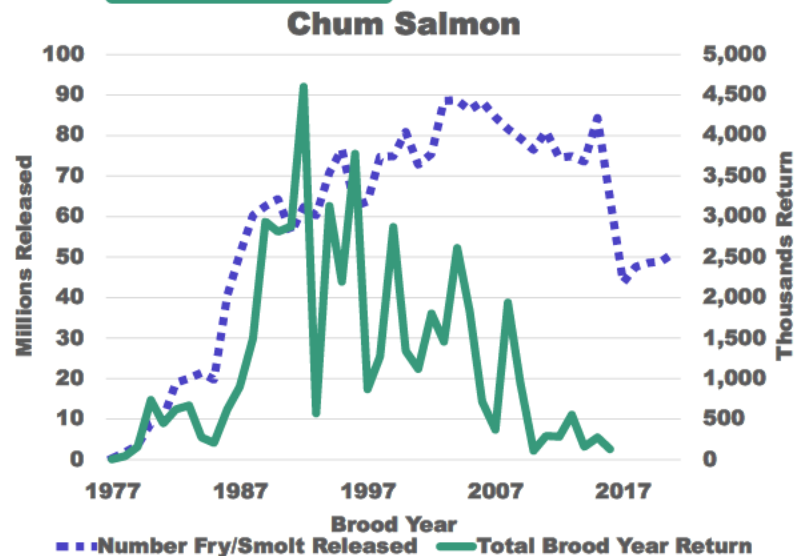
*The biggest in SE Alaska*

*The biggest in SE Alaska*

A pattern?

Returns Peak  
then  
Returns highly  
variable and  
declining  
and now  
Challenges  
meeting Brood  
Stock and Cost  
Recovery goals  
despite  
Huge Releases

(Source: [www.adfg.alaska.gov](http://www.adfg.alaska.gov) )



24

Figure 3.

**I learned...It takes wild spawners to make spawners**

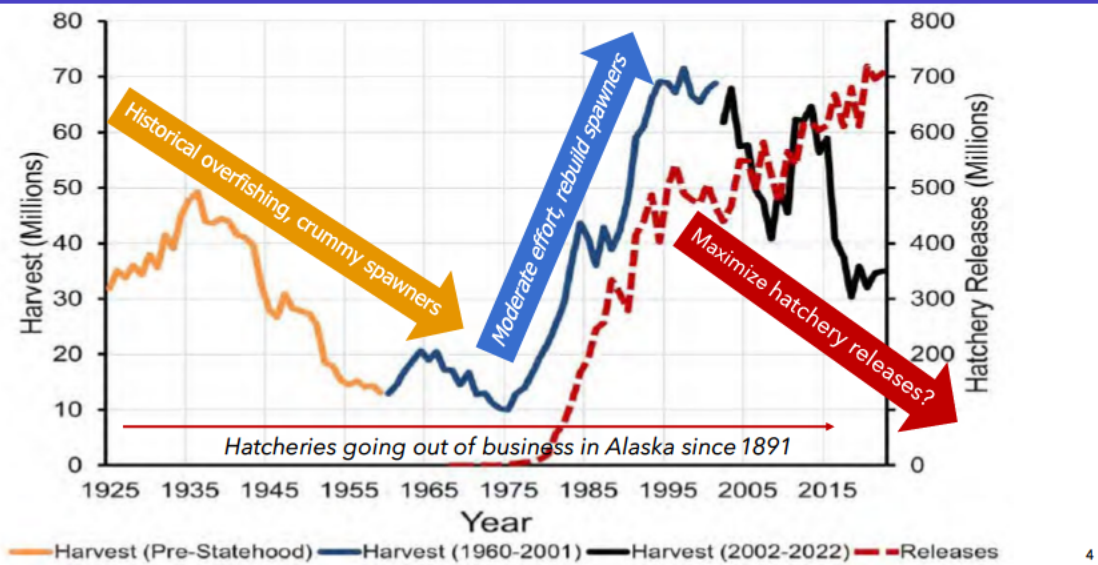


Figure 4. Number of salmon commercially harvested in Southeast Alaska by period (5-year date-centered, moving averages) and the number of salmon released from hatcheries.

## Proposal 156: Cut Hatchery Chum and Pink Production by 25%

I support with amendment that only chum production should be reduced by 25%

Shannon Vandervest [REDACTED]:  
SE resident and commercial salmon fisherman 44 years

Reasoning:

Supply and Demand: Basic Economics 101

When the supply is greater than the demand the price is driven down. I am tired of working harder and harder every year, for less money. I don't target chum or pinks for I direct market and my main product is sockeye and king salmon. Over the years there are fewer and fewer wild sockeye and kings returning to spawn. Instead I have to battle the overproduction of chum in every gillnet set just to catch a few sockeye. No matter which district you set a net you can't get away from the chums.

Want and Waste:

Hatcheries are producing so many chum that the markets can't handle the numbers. Canneries drop their prices or quit buying all together while bays have record numbers of chum returning. Fish are swimming around with no place to go because they came from a hatchery pen in some saltwater bay instead of a freshwater creek. We as fishermen get fined if we catch too many fish and can't take care of them. Why should hatcheries be treated differently? Hatcheries produce too many chum which results in want and waste

**Submitted by:** Shannon Vandervest  
**Community of Residence:** Petersburg, Alaska

I OPPOSE

Proposal 165 5 AAC 33.310. Fishing seasons and periods. Change the start time of weekly drift gillnet fishing periods from Sunday to Monday.

Shannon Vandervest [REDACTED]

SE resident and commercial salmon gillnetter 44 years

If this proposal passes it will be detrimental to direct marketers for we would be forced to lose fishing time on any openings over 48 hours and to the small fish plants that ship fresh fish to markets.

Most fresh markets need to have their fish ready for sale by Friday of each week. As it is, Sunday openings barely allow us the time we need to fish and to ship in order to make our market deadlines. Smaller SE towns only have 1 jet a day for shipping so our options are limited.

A typical direct market schedule for a 3 day (72 hour) or longer gillnet opening is as follows:

Start fishing on Sunday and quit Wednesday evenings. Run to town and be at the boat early Thursday morning to package fish and to get it to the airport. Fish arrives (hopefully) at its destination Thursday night or early Friday in order for the buyers to pick it up and get it ready for their fresh market.

I have had my net run over twice by other gillnetters. All of the other times my net has been run over was by tourists renting boats unguided. There seems to be just as many tourists on Mondays as there are on Sundays so this proposal would not help the net conflict issues.

Lastly, noon openings allow us the choice to run to the grounds on Sunday or to leave Saturday evening, anchor up, and rest until go time. It also gives us the time to make a couple sets on the last day before the noon closure. Yes seiners start early but they also don't close until nighttime This proposal is stating that we start early and close early 6-8 am. This would not give us time to really fish on the last day of the opening

Thank you, Shannon Vandervest

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**Submitted by:** Kory Versteeg  
**Community of Residence:** Petersburg

Prop #243

I'm commenting in support of #243.

The fishing organizations have been refining things in this proposal to satisfy the board for the better part of a decade. I feel it's the best way to give everyone a fair shake at the harvestable biomass and it will create so much more data for the department to better manage the resource.

Prop #242

I'm commenting to oppose #242

As a commercial fisherman, this proposition will all but shut down any hopes and dreams of ever getting a commercial red crab season ever again.

This will make managing the resource that much much harder as it will limit the data the department gathers from the well managed commercial king crab fishery. I could see maybe Auke bay and or gastenau channel being exclusive for personal use only, but all of District 11-A is a death sentence to the commercial red crab fishery. There's got to be a solution that gives all interested parties a shot at this resource. This definitely isn't it.

**Submitted by:** Garret Vincentz  
**Community of Residence:** Ketchikan

My name is Garret Vincentz and I am a resident commercial fisherman and permit holder for Salmon Troll and Purse Seine. I also participate in the commercial shrimp fishery as my wife holds a permit card for pot shrimp fishing. I am 42 years old and a first-generation commercial fisherman. I have also had the pleasure of working with the Dept. of Fish and Game in the commercial fisheries division here in Ketchikan in 2008. Like many residents I also participate in sport and personal use fisheries thru out the year.

Enhancement

Proposal 156- I OPPOSE any reduction to Chum and Pink Salmon production in SE AK. As a board member for the Southern Southeast Regional Aquaculture Association (SSRAA), I have observed how crucial our hatchery programs are to maintain not only commercial fleets, but also opportunity for local sport and subsistence harvest as well. While not many hatchery pinks are reared here in SE, many chums are reared here and what is not readily understood is how these fish pay for other yearling production (i.e. king and coho production) which requires more time and expense. If chums are not being produced many other hatchery programs will not be able to be fully funded causing detriment to all user groups and threatening the very cultural identity of Southeast Alaska. This is but one of the many negative ripple effects that will be felt thru out the region should this proposal pass.

## Commercial Salmon

Proposal 167- I OPPOSE changing the length of a commercial seine in the SE AK purse seine fishery. This proposal would cause burdening cost for fisherman who would simply be trying to keep the playing field even. Adding 50 Fa off seine could cost tens of thousands of dollars. I believe that adding extra seine length may have unintended management consequences. I in consultation with other seiners believe adopting this proposal would cause unnecessary conflict and turmoil within our fleet by allowing a range of gear to be used within our gear group.

Proposal 168- I SUPPORT this proposal. Consistency with regards to use of aircraft during open fishing periods should be adopted weather used in common property or THA harvests.

## Sablefish

Proposal 194- I SUPPORT the use of smaller escape rings in black cod pots for all user groups. I regularly harvest black cod for personal use using slinky pots and have observed fish upwards of 6 lbs. wiggling successfully thru the current escape ring size. I have also noticed many harvestable fish stuck in these rings making them susceptible to sand fleas and in some cases rendering them unusable. These fish would not be wasted if smaller rings could be used. Furthermore, it is quite easy to release undersize sablefish as they are unharmed and quite energetic after their long ride to the surface.

## Shrimp

Proposal 222- I SUPPORT seasonal sport, personal use, and subsistence closures for the SE Alaska shrimp fishery. It seems very reasonable to protect spawning biomass during the spring months for all users, particularly with respect to dialogue regarding recent changes to the commercial fishery. If the intent of change to the commercial harvest was to protect shrimp during an ecologically sensitive period, then common sense tells us that the provision should be applied to all users. There are still ten months a year to procure a personal use harvest of shrimp, and that certainly seems like plenty of time to do it.

Proposal 224 and 225- I am NEUTRAL on the timing of the commercial shrimp fishery, however, would ask that some consistency be applied with regards to the future of commercial harvests. The change in regulation during the last cycle caused shrimp fisherman many unintended consequences which include but are not limited to changes in fishery performance, changing of maintenance schedules for vessels and gear, timing and integration into other fisheries, and tragically the lost opportunity and potential income from the entire harvest for the 2022 season.

All other Shrimp Proposals- I OPPOSE any further changes to the shrimp fishery until adequate time has allowed for biological response to proposals we have already initiated. Changing gear regulations and allowable gear would add yet another layer of inconsistency to a puzzle that we are all trying to protect, utilize and solve. Until some stability is recognized by all user groups of this fishery these proposals are nothing more than darts being thrown at a target that is moving by our own doing.

Proposal 260 and 261- I oppose both the proposals for regional commercial closures in George and Carrol inlets, Thorne Arm, and Traitors Cove. Despite the proposer's complaint that commercial harvesters are depleting resources in the stated areas, it should be noted that very little commercial harvest occurs in these areas and for a two-week period at most. To my knowledge only one or two

commercial shrimpers utilize these areas with small boats that would not allow them to fish further from town. It has been my observation during the few times that I have commercially set gear in these areas that there was very limited participation and that CPUE was actually quite good despite being at the end of the fishery. I spend time in the head of Carrol Inlet from June thru December and rarely see any gear, sport or commercial in the water north of Shoal Cove, located less than halfway up the 20 plus mile long inlet. Collectively the area encompassed by the proposal would close an unprecedented amount of area to the commercial fleet for no biological reason. There are already area closures for the commercial fleet in the clover pass area north of town. Lastly enforcement of proposal 261 is impossible as there are many other areas in the West Behm Canal corridor that would remain open to sport shrimping by all users, as well as many other public docks and safe harbors for shrimpers to utilize outside of Traitors Cove.

Thank you for your time and dedication to our resources,

Garret Vincentz

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January 10, 2025

Mark Vinsel

Monroe, WA

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811

**RE: Personal Comments on 2025 Southeast Board of Fisheries Proposals**

- 1. Proposal 156 – STRONGLY OPPOSE**
- 2. Proposal 138 – SUPPORT**
- 3. Proposal 143 and 144 – MODIFY**
- 4. Proposal 149 – MODIFY**

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

After nearly 20 years fishing the shoreline areas of the Juneau road system as a local resident, I retired in 2019 to the Skykomish River valley in Washington State and since then have fished the Juneau area as a nonresident on regular visits to target the DIPAC Chinook and Coho sport fisheries and local trout fishing. I fish in Juneau more than I am able to fish my local area because the Skykomish and its tributaries are closed to all fishing from mid-February through October due to conservation concerns, since 2023. In my time in Juneau I was president of Raincountry Flyfishers (2003-2006) and executive director of United Fishermen of Alaska (2004-2012). I also continue to serve since 2006 on the DIPAC Board of Directors, representing non-marine roadside fisheries, so I am very familiar with fishing around Juneau.

I offer the following comments on proposals before you at the 2025 Southeast Alaska finfish meeting.

**1. Proposal 156 – STRONGLY OPPOSE**

I strongly oppose proposal 156 that would call for a reduction of hatchery pink and chum salmon production by 25%. While this may seem to the far-off proposer to address abundance of other salmon species across the North Pacific, that is not supported by scientific research, especially in the case of chum salmon.

The proposal if approved would however have a direct negative impact on wild salmon in the Juneau area, as it would jeopardize the financial stability of the DIPAC hatchery and cause a reduction in the sportfish programs that do not bring positive revenue. I strongly believe that the sportfish programs of DIPAC are critical to wild salmon in the Juneau area by providing harvestable salmon for Juneau residents and visitors annually – reducing the impact on Juneau's very limited roadside accessible salmon and trout streams. DIPAC is funded primarily through

cost recovery and the salmon enhancement tax on its production of chum salmon. If the chum production is cut by 25%, it is likely to result in a reduction or elimination of DIPAC's chinook and coho programs.

Before DIPAC was able to obtain an improved coho broodstock in the early 2010s, the coho program was nowhere near as popular or productive as it is now, and in that era it was common to see illegal snagging and out-of-season bait fishing at Cowee creek, a favorite freshwater sport fishery for many Juneau anglers. Please do not set us down that path again.

## **2. Proposal 138 – SUPPORT**

Proposal 138 would prohibit snagging in the Mendenhall Wildlife Refuge. I support this proposal because many DIPAC bound coho and chinook salmon use the waters of the Mendenhall bar as a shortcut in returning to the hatchery, and are “sitting ducks” to snagging during low tides that can isolate them in small shallow pools. In addition, snagging interferes with other legal fishing methods due to the broken skin in snagged salmon, as other salmon nearby go into a panic response and do not readily bite lures or flies where snagging is being done.

While spinfishers and flyfishers can easily share an area like the mouth of Fish Creek or Mendenhall wetlands at the Bayview subdivision, when snaggers arrive we might as well go home. Since about 2006, ADF&G has clearly posted that snagging is allowed in Fish Creek pond (a DIPAC release site) while not allowed in Fish Creek or its mouth at the Mendenhall bar. This generated a very popular fly and spin fishing fishery enjoyed to this day in the creek and creek mouth. Proposal 138 would help ensure similar fishing opportunity in adjacent areas of the Mendenhall Wetlands by prohibiting snagging.

## **3. Proposal 143 and 144 – MODIFY**

I suggest that since the reasons for proposal 143 and 144 relates specifically to Prince of Wales Island, that the proposals be modified to affect Price of Wales, not all of Southeast. I do not perceive an overabundance of Dolly Varden or Cutthroat trout in the Juneau area.

## **4. Proposal 149 – MODIFY**

As there are two Peterson Creeks on the Juneau road system, the proposal if adopted should be clarified as to the Peterson Creek on the mainland, not the Peterson Creek on Douglas Island.

Thank you for your consideration and service to Alaska fisheries.

Sincerely,

Mark Vinsel  
Monroe, WA

PC531

**Submitted by:** scott visscher  
**Community of Residence:** haines

I oppose re-allocating any troll King Salmon quota to any other group. As a fishery we are suffering enough thru lowered quota, salmon prices, conservation closures, etc.

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PC532

**Submitted by:** William Vollendorf  
**Community of Residence:** Anchorage Alaska

Oppose proposal 168, modify regulations to make it unlawful to use aircraft for locating salmon during any open commercail purse seine fishing period.

My name is William Vollendorf, I have been flying the black super cub for 15 years in S.E.A.K. let me say I absolutely love my job working with the fisherman and flying stream and effort surveys for the ADF & G out of Sitka since 2019.

This is my main source of income. So I am fighting for my job once again.

Looking at proposal 168 brought forward by ( PVOA) Petersburg vessel owners association, one sentence keeps coming up "increasing vessel efficiency". A pilot contributes to the efficiency greatly. This is why all fisherman in S.E.A.K . have a the option to use a pilot.

Currently manned aircraft are illegal in all areas except for hatchery THAs. According to PVOA "This creates a loophole where a plane that was flying legally spotting at a THA, could fly back to town to refuel or grab parts, and spot for vessels that are fishing in non- THA areas."

Great story? Any evidence? This is a weak attempt to stop some fisherman from lawfully using a pilot and slowing the efficiency and cost savings all fisherman strive for.

I oppose proposal 168..

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PC533

**Submitted by:** Marjorie Vonda  
**Community of Residence:** Juneau

I'm opposing 242 .

The proposal is worded poorly and has extremely greedy intentions .

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**Submitted by:** Harriet Wadley  
**Community of Residence:** Craig

Proposal 110, manage the sport fishery in season..... I am in support of this proposal with the ATA amendments.

This keeps the sport fishery within its 20% quota. It's not right that the charter industry has grown with no limits. 20 years ago i told the charter boats in these meetings that they needed to limit participation. They have refused to limit their numbers. The only limit now to their numbers is economic. It is the charter industries fault they are in this situation. They could have limited the number of charter boats before it became an issue. Now they want to take quota from the trollers because they have too many boats fishing the sport quota. If we let them take more of our quota now they will just grow more and want more three years from now and then again and again till the trollers have lost our quota.

I can not afford to lose my kings. Losing my August King openings the last two years has contributed to me having to take out 40,000.00 in loans to cover engine and gear repairs. With prices down and coho fishing slow i am barely staying in business as it is.

Proposal 113, increase sport allocation to 25%...I am totally opposed to this for the reasons stated in comments for proposal 110

Proposal 130, Allow for the remaining king allocation to be harvested in a single opener beginning July 1st..... I am in support of this proposal.

Having one opener makes it way more efficient in getting troll kings. I lose at least a week of coho fishing during the second king opener if not more. During the second king opener i am not in coho areas so during the fishery i am off the cohos with no guarantee of catching kings. I can lose two weeks of coho fishing on this second opener. When i catch most of my cohos after July 15 and till the last week of august, losing two weeks out this time is huge. Eliminating the Aug king fishery would be huge in my botton line. This would basically give me two weeks more coho fishing and I will have caught the same amount of kings. Would love if this was adopted.

Proposal 131, limited harvest troll fishery....I am against this proposal

Fish and game last year did this. Opened it for a few fish per boat. They didn't open it long enough. I had to leave kings i was catching in the water because my trip was going to end the day after it closed. I could not lose a days coho fishing for a few kings. Wx and distance to the buyer was prohibitive . This also is a reallocation of fish from highliners to boats that are not fish killers. This is not a quota king fishery where everyone gets a fair share. It is an open fishery and you catch what you can find. I am opposed to this

Proposal 132, chinook salmon of 26 1/2 from snout to fork of tail. I am in support of this proposal with an amendment to leave the 28" tip measurement in there for the old timers who can't change.

I am strongly in support of this. The problems with how we measure our fish now is i have to leave legal fish in the water. Measuring to the tip of the tail is not a very accurate way of measuring fish

because the tips of the tail do not stay in the position it was in when i land my fish. The tail when the fish is in ice will open up and can be 1/2 shorter when i sell. Add into that when a fish is cold it is shorter than when fresh. This does not happen with all fish but it forces me to not keep 28" fish. I can now keep only 28 3/8 fish and even then I've had fish that were under the 28" line. Measuring to the fork in the tail instead of the tips at least takes the tip movement out of the equation and lets me keep fish that are small legal fish instead of throwing them back because they might end up too short.

Proposal 156, reduce hatchery production 25%....I am in support of this.

As a coho salmon fisherman i have seen my coho production drastically drop and coho fish sizes have been really small for the fish that do show up. Fish and Game and these hatcheries have no idea what the massive hatchery chum and pink salmon releases are doing in the ocean and how it is affecting the cohos. I think these massive releases are affecting coho size and returns. And until there is scientific research otherwise, I dont think anyone can say for sure how these hatchery releases are affecting our ocean cohos. Hatchery production keeps increasing. I think it's time to slow em down.

Proposal 217, open cucumbers on Sunday....I strongly oppose this proposal

This is just a reallocation of cucumbers from one group to another. I am an older woman diver (probably the oldest woman diver in the fleet) and I can still get my quota most openers. This is just a way for guys who won't work hard before the opener to find cucumbers or are not efficient harvesters to get more of the quota at the expense of those of us who are!!!!!!

Proposal 218, Extend sea cucumber past march31....I am opposed to this proposal.

The cucumber fishery would not be going past December if Fish and game would quit giving huge quotas in the Ketchikan area that are not there. No area should be open more than 8 openings if the quota is properly set. The chatam areas are closed long before march 31 and the quotas seem about right. The ketchikan area is open all winter. that's because the cucumbers are not there. We just keep going over the same areas over and over and over again till there is not a cucumber left to reproduce the next year. That's the reason these areas remain open till March

Closing the areas on March 31 will protect the fishery for two reasons. If the area is still open it had too much quota to begin with and reason two is there is very little enforcement for the cucumber fishery and leaving this open just allows opportunities for poaching in areas that are not open because there is not many cuks in the open area, affecting quotas for the next year.

Proposal 224 and 225, move shrimp fishery back to october....I am opposed to this proposal

The shrimp fishery was moved for a reason. To allow females to spawn before they are fished on. Hopefully in time increasing the shrimp biomass. If this is moved back to oct the fishery will die!

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**Submitted by:** Nicholas Walsh  
**Community of Residence:** Chugiak, AK

I have been an Alaska resident for over 45 years and I've worked in the charter business for 30 years. I have been a charter captain at Waterfall Resort for 25 years as well as worked out of Craig and Sitka. I strongly support proposal 108 and emphatically support proposal 113. The financial contribution of the charter industry to communities in southeast Alaska cannot be understated.

**Submitted by:** Frank Warfel  
**Community of Residence:** Wrangell, Alaska

Hello board. My name is Frank Warfel Jr. I am a born and raised Wrangellite of 51 years. I am a second-generation commercial fisherman and the owner operator of the F/V Pacific Sea. I own a K29A Brown/Red King crab license and today I am here to comment on proposal #242 and #243.

Firstly, I firmly oppose proposal #242. This is and would be an unfair allocation move on behalf of Juneau sportfishing residents, a sense of greediness. Juneau sportfisherman get opportunity every year to harvest a portion and the Alaska Department of Fish and Games allocated amount of Red King Crab, whereas I have had opportunity 2 times in the last 15 years of owning my permit, the last time being 7 years ago. Losing the opportunity to harvest Red King Crab in 11-A (Juneau Area) forever will further burden my investment and my overall shrinking income with our other fisheries being crippled in Southeast Alaska as well. Not only I and my family will be affected, many other families, permit holders, and processors for that matter, will ultimately be affected as well in our neighboring towns of Ketchikan, Petersburg, Kake, Sitka, and Haines. Please do not take away opportunity for the commercial fishing fleet. Times are hardening up as it is with shorter seasons, unfavorable fish prices, cost of doing business on the rise, the list goes on.

Secondly, I am in full support of proposal #243. The Alaska Department of Fish and

Game every year does a great job conducting a thorough Red King Crab survey determining a biomass and pounds of legal males. Every year there is a surplus of legal male red kind crab in this survey. We now have the opportunity to take advantage of this surplus with adopting proposal #243. Remember board this is supported by all stakeholders including fisherman, processors, AND the Alaska Department of Fish and Game themselves. Once again board we our simply just looking for opportunity. Please trust the ADF&G science and their backing of proposal #243. Please allow us 58 Red King Crab permit holders, 57 of those being Alaska residents, to take advantage of the harvestable surplus and our share of the resource. The additional income will be welcomed now and generations to come.

Thank you everyone for your time and involvement in this pivotal moment and decision of the Red King Crab fishery. To reiterate I firmly oppose proposal #242 and fully support proposal #243.

Frank Warfel Jr.  
 F/V Pacific Sea  
 Wrangell, Alaska

**Submitted by:** Brian Warmuth  
**Community of Residence:** Ketchikan Alaska

Thank you for taking the time to read my comments regarding some of the proposals dealing with Southeast Alaska. I am a Troller and need much more stability for my small business. The A.D.F.&G mismanagement of the King Salmon allocation the last two seasons has cost my family a great deal of money. Hopefully, you will resolve this problem at this meeting. Please maintain the 80/20 split in Allocation , between the troll and commercial charter fleet

Also, I am apposed to the 25% across the board cut in hatchery chum salmon production. This one size fits all approach is a very poor idea . It would be a much better Idea to do a site by site review lead by the R.P.T.

**Submitted by:** Jesse Warren  
**Community of Residence:** Sitka Ak

Dear Board of Fisheries Members,

My name is Jesse warren, I'm 24 and grew up in the rural community of Gustavus Ak, Im a third generation fisherman and from a young age I've been participating In many different commercial fisheries.

I am recently married and also recently purchased a small power troller.

My wife and I fish year round in an effort to set up a secure future in commercial fishing, where we can raise a family in the same manner we were raised.

I strongly oppose Proposals 108 and 113. Both of these proposals seek to transfer King Salmon from local commercial fishermen who have depended on king fishing for generations, to nonresident anglers. Nonresident anglers have many fishing opportunities to make their Alaskan experience worthwhile, while commercial trollers do not have an alternative fishery to replace the value of catching king salmon. The financial impact of these proposals would be devastating to commercial trollers, crew, and families.

The 80/20 split must be maintained to ensure the historic lifestyles of commercial trollers.

I support 109 and 110.

In season management by ADFG is essential in keeping all user groups within their allotted harvest quotas. Allowing one user group to go over their allotted quota at the expense of another is unacceptable.

As a commercial troller who financially depends heavily on the king salmon fishery, I can say it is devastating to learn that one of only two summer king openers has been canceled due to another user group exceeding their allotted quota.

I oppose proposal 199.

If the department were to delay an opener due to weather it would only cause fishermen in an area with a delay to move to an adjacent area with no delay,

This condensed fleet would cause difficulty for management as well as increased competition for fishermen in an area without a delayed opener.

I believe this proposal was written to benefit lingcod fishermen, but in reality it would only cause a number of unintended

negative consequences.

It should be a captains decision alone whether or not to fish on opening day.

I strongly oppose proposal 202.

Proposal 202 states that "only one operational unit of dinglebar troll gear [TROLL GURDY LINE OR HAND TROLL GURDY LINE] may be onboard a vessel or deployed from the vessel at or below the surface of the sea [IN THE WATER] at any time;" witch would completely change and handicap the way that any dingelbar boat currently operates.

Making it illegal for a fishing vessel to be properly prepared with spare gear for the fishery it is participating in, is what I believe to be enforcement overreach.

This proposal would cause unnecessary rush to the already very difficult task of pulling in and servicing a train.

This creates unintended dangers to all crew members resulting in possible injury.

Thank you for taking time to read these comments and I sincerely appreciate your consideration on these concerns.

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**PC539**

**Submitted by:** Kelly Warren

**Community of Residence:** Gustavus

I oppose proposal #242 in every way. As a commercial fisherman of 30 years and the owner of a Red King Crab fishing permit it is ridiculous to even consider allocating all of the Red King Crab to sport fishermen. I invested \$250,000.00 in a crab fishing permit that included Red King Crab several years ago and have yet to have had an opportunity to harvest any Red King Crab while sport fishermen are harvesting an over abundance every year because they refuse to document their harvest properly or follow the set guidelines. Every year I see sport fishermen illegally harvesting Red King Crab because they have vested interest in protecting the biomass. Commercial fishermen however, have a proven track record of working with Fish and Game to protect fishery biomass in an effort to be able to prosecute fisheries with the health of the stock as their concern.



I support proposal #243 because I believe that those people who have actually invested in the Red King Crab fishery should at least have the opportunity to have a fishery that Fish and Game promote as a reasonable and measured way to allow Red King Crab permit holders to harvest at least some of the Red King Crab biomass without the negative risks associated with a competitive harvest fishery.

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PC540

**Submitted by:** Stephanie Warren

**Community of Residence:** SITKA A.K

My name is Stephanie Warren. I'm a born and raised Alaskan who grew up on boats. Commercial fishing has been my main source of income my entire life. I currently enjoy trolling, long-lining, dinglebarring, and crabbing. These proposals are very important to me because a very larger portion of my time is claimed by fisheries, and their effects will impact me and my lifestyle greatly.

I strongly oppose proposal 108 and proposal 113. The motive of both of these proposals is to transfer King Salmon from local, and primarily resident commercial fishermen to nonresident anglers. The idea of potential payback in years to come is far too unreliable for a commercial fisherman to base his livelihood on. There is no alternative species of the same value that can replace the loss this proposal would bring to the trollers. Many commercial fishermen financially depend on the King salmon opener. Measures must be taken to keep the nonresident anglers from taking from the local, and commercial fishermen.

I support proposal 109 and proposal 110. It is vital to keep all the fisheries within their harvest parameters, and should be achieved by in season ADFG management.

I support proposal 141 if amended to read "only during catch and release sport fisheries"

I strongly oppose proposal 199. Complete weather delays should be for all areas or none at all. If one area is closed due to weather delay it will concentrate boats that would normally fish separate areas into areas with typically calmer waters that are predominantly fished by smaller more local boats that may not be able to fish east Yakutat regulatory area.

I strongly oppose proposal 202. The current regulations are as follows. "Dinglebar troll gear is gear that consists of a single line that is retrieved and set with a troll gurdy with a terminally attached weight from which one or more leaders with one or more lures or baited hooks are pulled through the water while a vessel is making way; only one troll gurdy line or hand troll gurdy line may be deployed in the water at any time." Proposal 202 does not clarify these regulations but entirely changes the process and cuts down efficiency greatly. When its time to retrieve the lingcod, one person disconnects the train, brings it to the other side of the vessel, and services the train by hand. Meanwhile on the opposite side of the vessel another person deploys a fresh train and attaches it to the only troll gurdy line. Proposal 202 states that only one train may be onboard a vessel or deployed at any time and any additional trains may not be trailed behind the vessel at any time. Taking away the ability to retrieve and service a train at a comfortable pace while another train is being deployed puts me as a female crew member (in a predominantly male industry) at a disadvantage to any male crew member with more upper body strength that can bring in a train faster. This also increases the risk of injury due to the urgency this

change would encourage. Because we pull the train in by hand against any current, prop wash, as well as all the additional weight and drag of the catch, it is already a very physically demanding position.

Thank you very much for taking the time and hard work to hear out and consider the thoughts and concerns of so many fishermen myself included.

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W. Scott McKelvey  
Waterfall Resort  
PO Box 1218  
Craig, AK 99921

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

Subject: Support for Proposals 108 and 113, Opposition to Proposals 114, 115, 116, 117, 119, 120, 140, and 141

Dear Members of the Alaska Board of Fisheries:

My name is Scott McKelvey, and I am the General Manager for Waterfall Resort. Waterfall Resort has a rich history in the sportfishing industry in Southeast Alaska, as we have been in operation for almost 40 years. I myself started as a fishing guide with Waterfall in 1991, so I am coming up on my 35'th year in this industry. Waterfall Resort averages close to 2,600 guests a season, with this being a mix of both Resident and non-Resident anglers, and has close to 120 employees on staff between lodge employees and support staff located in Ketchikan. Many of our employees are also Residents of Alaska. This all said, one could say we are one of the largest charter operations in the State of Alaska. Because of these reasons, I feel I can speak on the economic benefits that having fair, science-based regulations have on the stability of the sportfishing industry, and how that stability affects the local communities, local employment, merchants, vendors, hotels, and even the State of Alaska. What should be needless to say, there are millions of dollars each year that benefit all these areas because of the sportfishing tourism industry. We are afraid of the thought of having some of the non-science Proposals that have been submitted passing, which would result in a negative impact upon not just the charter industry but trickle down and hurt many other industries as well. Reducing fishing opportunities and/or implementing unfavorable fishing regulations will most likely have a negative impact on visitors wishing to come to Alaska. It is having these same visitors coming to the State that provide the above mentioned economic benefits and job opportunities as well.

Now, I am submitting this letter to express our strong **support** for Proposals 108 and 113, as we consider these as fair science-based Proposals that would help provide stability to our industry plus others around us. We would also like to see Resident protections built in to regulations that would help keep Residents secure to open year-round fishing for King Salmon, while providing fair science-based management on the non-Residents.

We would also like to submit our strong **opposition** to Proposals 114, 115, 116, 117, 119, and 120. We do not believe any of these Proposals are truly science based, and were born out of frustration from other user groups, as they are not supported by science or address different



levels of abundance. As just mentioned, these Proposals do not address the years of high abundance fairly, allow for proper Department management for longest the sportfishing season possible while staying within their allocation, and how if implemented would not allow the sportfishing industry to fairly fish up to their proper allocation. Once again, by following these Proposals as written, there would not be the opportunity for non-Residents to be managed by the Department to help catch the allowable sport allocation. Such oversight can then lead to larger issues with respect to the Pacific Salmon Treaty, if too many fish are "left on the table" that even the late season troll industry could not "mop up" everything. As mentioned, these Proposals are not science-based and only look to damage existing conservation efforts. Hence why we believe these were born out frustration.

In regards to Proposals 140 and 141, we cannot support either, as there has been nothing shown or mentioned by the Department of Fish and Game, as to either of these being an issue or needed.

Being a company heavily invested in the sustainable management of Alaska's fisheries, our support of our local merchants, vendors, communities, and the State of Alaska, we believe these decisions will have extreme consequences for the future of our resources and all those who rely on them. It is for everyone's benefit, that we all help support healthy fish stocks for all species, but provide a way that addresses the needs of all user groups in a fair science-based way. Every user group's future depends on this.

In closing, I would like to say Thank You for considering our beliefs regarding these Proposals, as we feel whatever your decision can make a huge impact on the sportfishing industry and the local economies. I appreciate the Board and do not envy the position you all are in in having to balance the fate and views of so many.

Respectfully,

A handwritten signature in black ink, appearing to read "W. Scott McKelvey". The signature is stylized and fluid, with a large loop at the end.

W. Scott McKelvey

General Manager

Waterfall Resort

scott@waterfallresort.com

**Submitted by:** Bryan Gibson  
Waterfall Resort Alaska

**Community of Residence:** Waterfall Resort

Dear Board of Fisheries,

I support Proposals 108 and 113, which provide a balanced, science-based approach to managing King Salmon fisheries. Proposal 108 maintains a 3-2-1 allocation with a 5% ceiling cap on the troll fishery and uses a 9-year average to accommodate cyclical abundance, ensuring stability and sustainability. Proposal 113's 75/25 allocation would provide adequate King Salmon for sport and charter sectors in most years without compromising conservation.

However, I oppose Proposals 116, 117, 119, 120, 140, and 141, as they lack scientific support. Restricting fishing during high abundance years (Proposals 116, 117, 119, 120) is not warranted and would harm the fishing industry. Proposals 140 and 141 (barbless hooks, no bait outside THAs) are unnecessary and unsupported by science. These restrictions would complicate fishing without ecological benefit.

Thank you for your consideration.

Sincerely,

Bryan Gibson

Fishing Guide

Waterfall Resort Alaska

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January 14, 2025

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P.O. Box 20688  
Juneau AK 99802

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

My name is Robert Watson. I have lived in Alaska for 44 years in various locations, including multiple years in each of Anchorage, Fairbanks, Unalakleet and Juneau. I have been a sport fisherman in each of these locations. For the past 37 years, my residence has been in Southeast Alaska, working in the fishing industry. I have commercially fished in Bristol Bay, Norton Sound and Southeast, and I have also worked many years at a non-profit salmon hatchery before retiring four years ago. I am still associated with the Port Armstrong Hatchery on Baranof Island as a volunteer board member.

I am writing to make it clear that I strongly opposed Proposal 156 currently before the Board of Fisheries.

Commercial and sport fishing are both fundamental to the economy of Southeast Alaska, as well as to the lifestyle that makes living in this rugged climate worthwhile. The fishing industry is the biggest employer and the only viable option for many of the rural communities that are spread throughout this region. It is also the economic backbone of most of the cities in Southeast Alaska. I know from many years of firsthand experience on different sides of the fishing industry how valuable salmon hatcheries are to every aspect of the fishing industry here. Because of the inherent high variability of annual salmon returns and the accompanying volatility of salmon prices, it is essential for hatcheries to produce multiple species of Pacific salmon to provide reasonable stability in revenues and cash flows, as well as to make ends meet.

The Port Armstrong Hatchery, like most others in Southeast Alaska, have operated extremely efficiently by fundamental philosophy and out of necessity in order to stay in operation and continue to fill our mission of supplementing the healthy wild salmon runs. Because all these hatcheries are non-profit by state law, our constituents and the majority of the board members are associated with the commercial and sport salmon fishing industries, mandating that the hatcheries make sustaining the health of the wild runs an even higher priority than the propagation of hatchery salmon runs to supplement those wild runs. The record of healthy runs and frequent all-time record returns since rebuilding the depleted stocks inherited from Federal management at statehood attests to the success of this approach. The Alaska Department of Fish and Game has also been consistently impressive in its own prioritization of the health of the wild salmon runs in deciding when to approve or deny any salmon production permits proposed by the hatcheries. The Regional Planning Teams, which include representatives of the commercial and sport fishing fleets together with ADF&G managers are another effective layer of review important in maintaining a conservative approach to managing hatchery salmon production.

The Port Armstrong Hatchery produces three species of salmon to release in the wild: cohos, pinks and chums. Each of these are important to different gear groups. The cohos are the most important species for the trollers, as are the pinks for the seiners, and the chums for the gillnetters, with significant crossover benefits to the other gear groups as well. But the chums are by far the most important species economically to the hatcheries, because they can be produced at relatively low cost while bringing a high price when they return to the hatchery location at harvest time. For example, one chum is typically worth more than six times one pink. And while cohos are also valuable, they depend on one additional year of labor and feed intensive rearing before release and cannot be produced in significant enough numbers to

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support most hatchery operations. Therefore, chum salmon represent two-thirds to 100% of the revenues of most Southeast Alaska hatcheries necessary to cover the costs of operation.

Extensive studies by the pre-eminent salmon scientists in Southeast Alaska working for the National Marine Fisheries Service over several decades have analyzed the data regarding both any potential impact of hatchery salmon production on wild runs and any effect of the carrying capacity of the oceans on the health of the wild runs and concluded that the evidence strongly supports the absence of any significant negative impacts of either of these factors on the wild runs. Reducing the hatchery chum production in Southeast Alaska would be highly likely to provide no significant benefits to the wild salmon runs at all.

Proposal 156, if passed, would not only cause enormous economic damage to the fishing industry just through the reduction in return chums, but would also have a multiplier effect in causing most hatcheries to curtail other production or close altogether due to the severe reduction in revenues. The Port Armstrong Hatchery would almost inevitably end up going out of business in short order if this proposal were approved, with ripple effects impacting nearby communities such as Port Alexander, Kake, Petersburg, Wrangell, Sitka and Ketchikan.

Please vote down the ill-informed and ill-advised Proposal 156, and avoid creating an economic catastrophe for residents of all of Southeast Alaska.

Thank you for your consideration,



██████████<sup>n</sup> Juneau AK ██████████

PC544

**Submitted by:** Mathias Weibel  
**Community of Residence:** Sitka

I recommend that the Board of Fish select the elements of proposals that protect and support herring abundance, subsistence fishing, commercial trollers, and resident sport fishermen. I condemn the unjustified reallocation of king salmon from commercial trollers, working class fishermen feeding who are feeding our communities, to the charter fishing industry, which continues to deplete stocks, including stocks of concern, prioritizing nonresident sport fishermen and the tourism industry.

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PC545

**Submitted by:** tony weiss  
**Community of Residence:** juneau

i oppose commercial dungee fishing in the channel i have property in the channel its almost over fished with personal pots from lucky me to douglas harbor in the summer i have counted 150 crab pot bouys

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PC546

**Submitted by:** Darell Welk  
**Community of Residence:** Ketchikan

Board members

My name is Darell Welk. I own and operate Alaskan Fishing Adventures/Ketchikan a six person fishing lodge in Ketchikan. I have been a resident of Ketchikan for 41 years. Our small scale fishing business has paid to support my family for 35 years. We still own the lodge but have since sold the charter boat to another long time resident of Ketchikan. We take very few king salmon out of the equation to support both of these families. We can not continue to thrive in this business if we experience any additional cuts to the king salmon limits or available times to harvest. With recent cuts to halibut, ling cod and rockfish we will no longer be able to attract guests to come spend their money here without being able to offer king salmon opportunities. I hope you all take into consideration the amount of money brought in for the few fish we harvest. I commercial fished for ten years prior to starting this business and have first hand seen the difference in amount of resources harvested for the return.

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December 27, 2024

Alex Wertheimer  
17200 Andreanoff Drive  
Juneau, AK 99801

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

My name is Alex Wertheimer. I am a retired NOAA Fisheries Research Biologist who has been involved in Alaska salmon fisheries science and management for over 50 years, including extensive research into salmon enhancement technology, development of salmon enhancement policies, and wild and hatchery salmon interactions. I am writing you to OPPOSE proposal 156 to reduce hatchery pink and chum egg takes by 25%. This proposal would not achieve its stated purpose of improving the status of Chinook salmon stocks in the Yukon River and throughout Alaska. It would, however, do serious damage to commercial, sport, personal use, and subsistence fisheries in Southeast Alaska.

The concern of high abundance of salmon in Alaska needs to be put in perspective with the rationale and results of the modern Alaska salmon enhancement program. In the early 1970's, Alaska salmon harvests were at their nadir, with statewide catches of all species averaging just 22 million fish in 1973 and 1974. In the "good old days" of the 1930s, catches sometimes exceeded 100 million. The State of Alaska initiated a number of management actions to address the decline and rebuild production, with a goal of once again reaching harvests of 100 million salmon. In 1971, the Alaska Legislature established the Division of Fisheries Rehabilitation Enhancement and Development (FRED) within the Alaska Department of Fish and Game (ADF&G) for hatchery development. In 1972, Alaska voters approved an amendment to the state Constitution (Article 8, section 15), providing for an exemption to the "no exclusive right of fishery" clause, enabling limited entry to Alaska's state fisheries and allowing harvest of salmon for broodstock and cost recovery for hatcheries. In 1974, the Alaska Legislature expanded the hatchery program, authorizing private nonprofit (PNP) corporations to operate salmon hatcheries.

Alaska salmon harvests recovered rapidly in the second half of the 1970s, and exceeded 100 million fish by 1980. With the exception of 1986 (96 million), the statewide catch has been over 100 million salmon annually since 1980. For 1990-2015, harvest averaged 177 million salmon. After 1980, hatchery production started making up an increasing portion of the harvest, and now composes about 35% of the statewide catch. In 2024, statewide catch was barely 100 million, now considered low after decades of sustained high abundance. Hatchery fish were essential in limiting the serious damage of low runs to fishermen, processors, and markets. In Southeast

Alaska, hatchery chum salmon make up over 36% of the salmon ex-vessel value. Reducing this component by 25% would have a devastating impact on the commercial fishery.

The damage of the reduced hatchery production would extend beyond the commercial fisheries. Chum salmon production is the economic driver of hatchery production in Southeast Alaska. A number of programs enhancing sockeye, coho, and Chinook salmon are partially or completely supported by chum salmon returns. These programs support important local sport, personal use, and subsistence fisheries as well as contributing to the commercial common property harvest. Some of these programs would have to be curtailed. In my home town of Juneau, the DIPAC coho and Chinook program provide tremendous recreational opportunity to marine sport and charter, and especially roadside anglers. The Sweetheart Lake sockeye program provides personal use and subsistence opportunity to fill the freezers of many local residents. These programs would be reduced or shut down if proposal 156 were implemented.

The irony is there is virtually no chance that implementing proposal 156 would have any discernable impact on at-risk Alaska salmon stocks, especially Chinook salmon. The amount of impact of the reduction on salmon ocean biomass would be trivial. Southeast Alaska hatchery chum salmon are estimated to compose 4% of the ocean salmon biomass. Proposal 156 would reduce this to 3%, a reduction of 1% of the total salmon biomass. And this is just the effect on ocean salmon biomass. While there are billions of salmon entering the North Pacific to rear and compete for food resources, there are trillions of other zooplanktivores such as herring, walleye pollack, cod, myctophids, and Japanese pilchards. Salmon have been estimated to make up 4-7% of the biomass of nekton feeding on zooplankton in the North Pacific. The 1% reduction in ocean salmon biomass potentially affected by the proposal would be  $< 0.1\%$  of the nekton biomass.

In addition, while density-dependent interactions, both intra- and interspecific, certainly exist and can be detected in the North Pacific ecosystem, this does not mean that such interactions are controlling abundance and run strength. Trends in populations of salmon and other species identified as impacted by high salmon abundance contradict the speculative doomsday hypothesis of basin-scale impacts. For example, sockeye salmon in Bristol Bay have been identified as impacted by high ocean salmon abundance, but Bristol Bay sockeye salmon have been at sustained and record run strengths concurrent with high ocean salmon abundance. Similarly, PWS pink salmon have been at sustained high levels of abundance in the past two decades, including the largest wild runs in the historical records.

Chinook salmon are identified in proposal 156 as a driving factor supporting this drastic reduction in hatchery production. However, Chinook salmon have low habitat and feeding ecology overlaps with other salmon species in the ocean ecosystem, and so are the most highly unlikely to be affected by the proposed action. Marine habitats of Chinook salmon related to depth distribution and migration patterns are diverse and often distinct from most other Pacific salmon. Juvenile Chinook salmon distribute deeper than coho and other juvenile salmon in their first summer and fall at sea. Immature Chinook salmon are associated with colder temperatures

and deeper depths than other salmon species. Winter commercial and recreational fisheries for Chinook salmon occur in the coastal Alaska, with no presence of the other species of salmon. Marine diets of Chinook salmon are also distinctly different than diets of pink, chum, and sockeye salmon and more similar to coho salmon.

In conclusion, large scale enhancement as designed by the State of Alaska has greatly increased harvest and fishing opportunities. Increased harvests have been compatible with sustained and record-breaking wild stock production, while concurrently achieving wild stock escapement goals. The economic benefits of these enhanced fisheries have large multiplier effects on local economies and employment. Large reductions in enhancement operations as proposed in proposal 156 would seriously disrupt Southeast Alaska fisheries and the associated economic and social benefits in the affected communities. The proposal would provide no benefits in terms of improving status of Alaska salmon stocks, including Chinook salmon. The Board of Fisheries, at its Cordova meeting in December 2024, rejected a similar proposal to reduce pink and chum salmon hatchery egg takes in Prince William Sound. I urge you to take a consistent position for Southeast Alaska, and reject proposal 156.

Sincerely,

Alex Wertheimer  
NOAA Fisheries Research Biologist (retired)  
DIPAC Board of Directors  
Science Panel member, Alaska Hatchery Research Program

**Submitted by:** Cheryl Wheeler  
**Community of Residence:** Seattle, WA

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:** Luke Whitethorn  
FV Haakon

**Community of Residence:** Petersburg

Oppose 156 reduction of hatchery pinks and chums would lower our commercial catch and cost us money that is really need to survive the salmon devaluation

Oppose 242 we are in need of our share of the king crab to have enough harvested surplus to have a fishery! With out this we would probably never commercially red crab again.

Oppose 251 the later start date would be devastating to income that crab and salmon fishermen catch! I fish dungeness for 2-3 weeks before salmon and going 2 weeks later would force me just to salmon fish!

Oppose 260 closing dungeness and shrimp areas would financially hurt commercial fishermen fisherman! Sea otters have already devastated our fisheries and having less area would devastate our fisheries even more!

Support 204

Support 228

Support 236

Support 237

Support 238

Support 239

Support 240

Support 241

Support 243

Support 248

Support 252

Support 258

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**PC550**

**Submitted by:** Mamie Williams

**Community of Residence:** Hoonah ak

Here's some language you can use in your comments:

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.

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**PC551**

**Submitted by:** Noe Winrod

**Community of Residence:** Craig

I oppose proposal 156 because I believe it will have extremely negative affects on fishermen and communities.

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**PC552**

**Submitted by:** Philip Winrod

**Community of Residence:** Thorne Bay

I oppose proposal 156.

As a seiner in Southeast Alaska I rely heavily on the revenue hatcheries provide. Reducing egg intake would directly affect my business.

I also oppose proposals 224, and 225. Having fished shrimp when the season was in October and now having fished the season in May, there is not enough time lapsed since the season was moved to May to support moving the season back to the fall. I would encourage those in favor of this proposal to allow

enough time for the life cycle of shrimp to reveal enough evidence to necessitate returning the season back to fall. Besides the weather is much safer in May.

Regards,

Philip Winrod

F/V Aurie G

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**PC553**

**Submitted by:** Karsten Wood

**Community of Residence:** Petersburg

I am writing to state my objection to proposal 156. We can all understand what the economic of these reductions would be on commercial fisherman, sport fisherman, and communities would be with these reductions put in place. Seems obvious. This proposal does not seem show the desired outcome would be achieved if passed. Salmon systems across the state have had significantly large returns in recent years, which seems to counter this argument pretty effectively. Seems hatcheries are an easy target for frustration similar to the lawsuits to shut down king salmon fishing in se Alaska brought in the last few years by conservation groups in regards to killer whales. Thank you for your consideration.

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**PC554**

**Submitted by:** Aaron Woodrow

**Community of Residence:** Juneau

I believe proposal 156 would have terrible consequences for the southeast salmon fisheries. chum salmon and chinook salmon don't really eat the same foods and should not be competing with each other for food resource. The additional chum and pink salmon fry in the ocean from hatcheries should actually be a boost in available food source for the chinook salmon.

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**WRANGELL CHAMBER OF COMMERCE,  
RESOLUTION NO. 001-2025**

**A RESOLUTION OF THE WRANGELL CHAMBER OF COMMERCE OF THE CITY OF  
WRANGELL, 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 Wrangell; 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 Wrangell depend; and

**WHEREAS**, Proposal 156 proponents use unsubstantiated data. There is an issue of reduced salmon numbers for some areas and some species, but this is not the solution and puts a needless burden on our local fisherman and our local economy, 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, tourism, and recreational opportunities in communities like Wrangell; 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**, 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 WRANGELL CHAMBER OF COMMERCE OF THE CITY OF WRANGELL, ALASKA, THAT:**

**Section 1.** The Wrangell Chamber of Commerce 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 Wrangell Chamber of Commerce reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to Wrangell's economy, community well-being, and sustainable fishery practices.

**Section 3.** The Wrangell Chamber of Commerce 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 WRANGELL CHAMBER OF COMMERCE OF THE CITY OF WRANGELL, ALASKA, THIS 13th DAY OF January, 2025.**



**Submitted by:** Andy Wright  
**Community of Residence:** Petersburg

242-I strongly oppose proposal 242, this reallocation of the red crab resource is excessively draconian to the user group that has been bearing the full responsibility of

Conservation. Changing the management style to an equal share System would slow the harvest down. This has been a winning strategy in many other fisheries. By supporting proposal 243 we would be able to stretch the season out through the winter months,oct-jan, we could then maximize market value with a steady product flow. The older crab would be removed from the environment , allowing the younger crab to grow into harvestable size . This benefits everyone.

I also oppose 166 , i have been gillnetting for many decades , and also am a shareholder in a small processing facility. Most business models are structured on getting product to town and processed as early in the week as possible. Starting later in the week disrupts the flow of commerce that has been established for most of the history of the fishery.

**Submitted by:** Wayne Wu  
**Community of Residence:** Craig Alaska

Supporting proposal 108 and 113 help to maintain 3-2-1 Type platform like we had, adding additional ceiling cap of 5% of the troll fishery to help protect comm. Fish from having sport charter going to far over their allocation and into their quota. This will help provide stability within the industry. Shift to an allocation of 75/25 Which would help give enough king salmon to sport and charter industry.

The economic ripple reach way beyond fishing lodge and guides. It's support local and domestic business well beyond.

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Seth Stewart  
Yakobi Fisheries LLC  
PO Box 13  
Pelican, AK 99832  
(907)209-1053

Dear Chair Carlson-Van Dort and Board Members,

My name is Seth Stewart. I was born and raised in Pelican Alaska. I have been a Troll Salmon fisherman or involved in the fishery my entire life. I started crewing when I was 11 years old on my cousins' boat. I bought my first boat when I was 24. I started to direct market my own fish in 2010 when I formed and started to build Yakobi Fisheries, a small seafood processor in Pelican. Due to increased demand I chose to quit fishing in 2015 and started to exclusively buy fish from other local fishermen. In 2024 we bought from 57 different small boat fishermen and their families. We process high-quality vacuum-packed portions and fillets of all 5 species of salmon, along with: halibut, rockfish, lingcod, black cod and spot prawns. Although, our primary product is hook and line caught troll salmon. The survival of our business depends on the health of the salmon troll fishery. King salmon makes up a large portion of our revenue, but more importantly the revenue of the fishermen and their families that depend on trolling as their primary income, often accounting for 50% of their revenue for the season.

We request that the Board's decision regarding the king salmon allocation achieve these three management objectives

1. Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within the 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 support Proposals 109 and 110** with RC Amendments.

**We strongly oppose Proposals 108 and 113.**

The state of Alaska and the legislature have expressed the seafood industry is in a crisis right now. While the Seafood industry lost \$1.8 billion dollars in 2024, the tourism and sport charter sector grows unchecked. The State has formed the Alaska Seafood Task Force, a joint committee of senators and representatives, to assess the seafood industry and formulate plans and proposals to improve the economic conditions of the commercial seafood sector. Now is not the time to take salmon from local fishermen and allocate it to non-residents on vacation. The Board of Fish has the power to help achieve the Task Force's goals by enforcing management policies that support small coastal communities, local fishermen and their families. Pelican was founded to process hook and line caught salmon. King salmon are vital to our community's survival.

Thank you for your time and consideration on this matter and thank you for supporting local small boat fishermen and the communities we call home.

Seth Stewart

A handwritten signature in black ink, appearing to be "Seth Stewart", written in a cursive style.

**Submitted by:** Julie Yates  
**Community of Residence:** Craig

January 13, 2024

Dear Chair Carlson-Van Dort and Board Members,

Thank you for your service and taking the time to read my public comments.

My name is Julie Yates. I am a second-generation salmon troller. I started commercial fishing with my dad, George Yates, on our family power troller the F/V Julie Kristine in the 1970s outside of my hometown of Craig, Alaska. Trolling is a way of life for my family and I.

When my dad retired from fishing after 60 years in the industry my husband and our two sons took over the family business. It has always been a dream of mine to continue my dad's legacy and for my children to grow up like I did. Spending summers on the back deck of a troller learning the value of hard work, resiliency, and a deep respect for the ocean and all it has to offer.

Fortunately I fished with my dad during the glory days when fish were plentiful and fishing charters were a rarity. Some of the best moments of my life happened there and helped shape me into the person I am today. I have deep roots and a tremendous amount of passion for this way of life.

Towards the end of my father's lifelong career my sons and nephew fished with him. He passed down his local and traditional knowledge of the waters and the art and skill of this fishery to them just like he did my sister and I. What a gift! What a treasure!

The last few years it has been especially difficult to make it as a troller. When the Wild Fish Conservancy (WFC) tried to shut down king salmon trolling in southeast Alaska it was a wake up call for me. I knew I had to get involved and do something. I was fortunate to be able to provide testimony along with other native trollers which helped us be able to fish that summer. Thank you to Tlingit of Haida Indian Tribes of Alaska for their support.

These last two salmon seasons because of how the current management plan is written trollers haven't been able to catch 80% of the king salmon allocation. This is due to higher numbers of non-resident catch rates and no cap on the sport harvest. This has impacted trollers tremendously. This makes me so mad! It is not fair and it is not right! Why isn't the current plan written in a way that the charter fleet is managed better? Why aren't they shut down when they go over their quota? Why isn't there a cap or limit on how many charter boats or guides are allowed? It feels like a free for all. It feels like trollers and their families are paying the price from the expansion of the commercial charter industry.

Our family has had to continue to adapt to be successful in this industry. My eldest son now runs our family fishing boat. I work as his deckhand and my husband and younger son have had to step away from Trolling. With the continual rise in the cost of living and loss of income due to our king salmon season getting cut short hard decisions have had to be made for us to financially survive.

It's time for the charter industry to make changes. I see more and more lodges starting in mid May and still fishing in early September. I see a big focus on catching the maximum amount of each species

allowed. I would like to see more focus on eco tourism and less fish boxes leaving the island. I would like to go into the airport during the summer and not see fish boxes stacked from floor to ceiling. It feels absurd for one person to leave here with 2-4 boxes and more than a hundred pounds of fish.

There are some lodge owners who run their operation respectfully. They have a few boats, hire local guides, their clients leave with a reasonable amount of fish boxes and their season runs June through August. I would like to see more operations run this way.

I am a recently retired public school teacher who spent 26 years as a teacher in Craig and know my community well. I know who is going to get hurt the most by mismanagement of the king salmon quota. I know that many of the lodge owners and guides aren't permanent full time residents. I know that most of the folks in the charter industry make a good income. I know that a charter boat captain gets paid the same daily wage whether he catches a king salmon or not.

I know that Trolling is the backbone of many small rural southeast communities and provides a significant amount of jobs. I know that 85% of power troll permit holders are Alaska residents. I know that king salmon are key to a troller's income and if they lose any of their king salmon quota significant financial hardships will occur.

I urge the board to:

Manage the 80/20 allocation split between the troll fishery and the sport sector with each sector to stay within their allocation.

Authorize in season management by ADFG to ensure the sport allocation is not exceeded.

Prioritize resident sport harvest within the sport allocation by controlling the non-resident harvest.

I support proposals 110 (with RC amendments) and 111 and strongly oppose 108 and 113.

Thank you for your time and service.

Respectfully,

Julie Yates

Power Troller

F/V Julie Kristine

Craig, Alaska

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**Submitted by:** Chris Ystad  
**Community of Residence:** Sitka

Madam Chair and Board

My name is Chris Ystad, a Sitka seiner/troller/ Longliner. I am writing to you in opposition to props 156, 167, and support of prop 168.

Firstly and most importantly I ask you to vote down prop 156. Hatcheries are an incredibly important part of my fishing business, along with hundreds of others fishing businesses and many coastal communities around Alaska. NSRAA programs offer great opportunity for both early and late season while the wild fish returns have yet to come in or are trailing off. I would estimate on average half of my gross comes from NSRAA fish. That number was nearly matched region wide with 46% of salmon value coming from enhancement fish in 2024. A 25% percent reduction would have huge implications on my season gross. Considering the extremely tough times commercial fishermen are facing currently taking any opportunity away from them would be dangerous for their businesses and Alaska coastal community economies.

This proposal will not only hurt commercial fishermen but will also hurt many sport and subsistence fishermen that utilize hatchery fish. Being on the budget committee for NSRAA and DIPAC I could foresee us cutting our more expensive programs, coho and king salmon because they are incredibly costly to raise. While cutting these cost may give a little more opportunity for net fishermen it would dramatically take opportunity away for the sport/subsistence users.

Supporters of 156 will site independent studies and graphs claiming hatchery fish are harming wild stocks. At best these studies show correlations with the increase of hatchery production and decrease in wild returns in some areas. All the while studies done by ADF&G show that there is no clear link between the two. I would argue poor spawning habitat is having more of an effect on wild stocks than food competition out in the ocean. I do recognize correlation is not causation but I think it's worth studying more to find the true answer.

I understand there is some concern with straying with hatchery fish, specifically at Crawfish Inlet. I would like to point out this was a ADF&G suggested release site. I would also like to point out this is still a relatively new program that NSRAA and F&G are making efforts to mitigate straying concerns. NSRAA has a long history of working with F&G on mitigating straying, case in point is the salmon lake weir project NSRAA ran for around a decade looking for strays. The NSRAA board recently chose to fund further studies in West Crawfish to do stream surveys and fry surveys to better understand homing and any straying tendencies these fish may exhibit. They are also looking at trying some new net pen strategies that may help the fish home in a little better.

Finally I would like to point out there is a process already in place to address hatchery issues and or hatchery production. This is through the Regional Planning Team process. The Board of Fish is an extremely important body when it comes to allocation issues and rules and regulations but production needs to remain in the RPT process.

If your still reading thank you for hanging in there with me. I request you deny prop 167. There is little to no reason to allow for longer nets. Seine nets are plenty effective as it is and all lengthening will do is create more issues with seiners fishing with one another.

Lastly I ask that you support prop 168. Planes have already been outlawed outside of THAs. I don't see any reason to allow them to fly within THAs. Doing so allows these planes and boats to work loopholes while they fly to and from these THAs. Example: Last summer I rolled the dice on fishing wild pinks in northern Sitka sound while the rest of the fleet fished in the local THA in the south part of the sound. My gamble payed off and I had a good day. My hook off was close to a normal flight path which I had seen a few planes throughout the day. I was down to my last couple sets before filling up and a group of boats came charging from the south end obviously pushing hard. Now I cannot confirm they had a plane report but considering the loophole in the regulations I would not be surprised.

Thank you for your consideration

Chris Ystad

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Dear Chair Carlson-Van Dort and Board Members,

My name is Brett Zaenglein. I live in Sitka, AK. I am representing myself. I am a S.E. Alaska commercial fisherman, based out of Sitka. The fisheries I participate in are trolling for salmon all year round, long lining for halibut and blackcod. I have been a commercial fisherman every year since 1991. I have been a plant worker, a crew member on several boats, I am a permit holder, boat owner, hire crew members in regards to these fisheries. One hundred percent of my livelihood and success as a small business within my community is earned and depends upon sustainable, good stewardship, and consistent management of these fisheries.

I have indicated my support and opposition for the various 31 King Salmon proposals under consideration by the board during this next regulatory meeting in the Proposal Decision Summary.

The one theme that seems very consistent among 27 of the 31 proposals is the desire to manage our King Salmon stocks and allocations sustainably & traditionally for Resident Alaskan sport/subsistence, commercial fisheries historical allocations, the Alaskan communities and families these fish provide for food, income, cultural, & historical way of life in S.E. Alaska.

I respectfully request the Board's decisions achieve these three management objectives:

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

**SUPPORT 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.

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

Proposal 113 seeks a direct, uncompensated re-allocation and increase to the combined personal use resident sport fishery and guided non-resident sport fishery. Most of this re-allocation would accrue to non-resident anglers at considerable cost to Southeast Alaska's coastal and rural fishing communities.

Proposal 108 seeks to "borrow" troll quota rather than take it, but the result is the same, since NR sport receives an allocation increase at low abundance and low abundance is the current and likely future reality.

I obviously wish to see decisions from the board that are favorable to my sector of the fishing industry- commercial salmon trolling - for all the obvious reasons of it's my livelihood, and the lifestyle I chose 35 years ago, have invested heavily in and wish to continue - lots of happiness, misery, some great seasons, lots of years just getting by, some years lately not getting by so well - the loss of our traditional August King opening these last 2 years due to the charter sector blowing through their allocation absolutely cost me the "potential" of my annual boat payment or annual house mortgage for example. I mention "potential" because we all know and accept that nothing's guaranteed in fishing but that is exactly what the charter sector continues to demand it seems, guarantees irrelevant of stock abundances, historical fishing allocations, or the needs of local Alaskan residents - to support the charter sector continued expansion of non Alaskan majority clientele to the detriment of local Alaskans. The continued increase of the unguided bare boat rentals and lack of the true numbers of fish being caught is another factor to the pressures of this whole thing. At the end of the day I wish to see solid unselfish decisions and long term thinking that supports ALL our S.E. Alaska communities. Proposals 109 and 110 with the RC amendments support what's been working for the last 20 years - Good Stewardship and the historical model I've built my business decisions on.



Respectfully and Thank you for the time and effort you folks put into these decisions,

Brett Zaenglein  
Sitka, Alaska  
F/V Ida Lee  
F/V Gretchen

Some additional bullet points in support of S.E. Commercial Troll Fishery

- 85% of the troll permits are owned by residents of S.E. Alaska.
- The non-resident/charter sector's demand for more King salmon during a time of low abundance ignores the impact of that demand on resident trollers and resident sport fishermen. Low abundance is our likely future
- Conservations is Alaska's mandate.
- Resident fisheries should not suffer to support non-resident harvest.
- The troll fishery provides more jobs for Alaskan residents than any other fishery and is especially important to those who live in Alaska's small remote towns.
- Roughly one of every 50 people in S.E. Alaska works on a trolling boat.
- Every troller is a small business.
- Trollers often bring back their catch to share with community members.
- Non-resident effort and charter vessel trips continue to expand (50% increase in effort and a 20% increase in charter vessel trips in 2022-2023).
- Juneau charter vessels are successfully operating on just 6-7 kings/charter vessel (compared to Sitka's 85-90 kings/charter vessel).
- Troll fishery is the second largest fleet in Alaska and the largest fleet in S.E. Alaska
- The troll fishery provides affordable, entry level opportunity when compared to other fisheries in AK.
- Troll permits are held by residents of virtually every one of S.E.'s 35 communities.
- Approximately 1,450 fishermen earn income directly from the fishery, including skippers and crew.
- The troll fishery has landing in more communities than the other salmon fisheries, and the economic impacts are large for those small

communities, providing earning potential in an area with otherwise limited economic opportunities.

- The S.E. troll fishery is consistently in the top 3 most valuable fisheries in S.E.
- Ex vessel (what fishermen get paid at the dock) is approximately \$37M (5yr avg).
- Including fishing, processing, and all related multiplier effects, the troll fleet has a total economic impact in S.E. Alaska of \$85M annually, as measure in terms of total output.
- Approximately 44% of the \$85M is derived from King Salmon harvest.
- The total troll fishery generates \$148 million annually in economic outputs when adding in restaurant sales, consumer purchases, transportation jobs and other benefits accruing throughout the west coast of the U.S. and beyond.
- Without King Salmon trolling, many fishermen cannot afford to harvest other salmon species, and many smaller and mid-size S.E. processors will not survive.
- Many S.E. communities have less than 100 residents and limited economic alternatives to commercial fishing.

PC562

**Submitted by:** Andrew Zuanich  
**Community of Residence:** Bellingham

I am southeast alaska permit holder boat owner and active captain

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PC563

**Submitted by:** Brian Zwick  
**Community of Residence:** Ketchikan

Proposal 156

I oppose this 100%. We as commercial fishermen need this enhancement to sustain our industry our salmon stocks will decline if we don't put something back. The king salmon decline is caused by the trawler fleet if you eliminate them problem will be solved for king salmon and many other species. Look at the number of kings that are killed and wasted in the gulf and Bering Sea due to trawler bycatch that's the real issue here we need to stop looking for excuses and get to the real problem. Stop trawling in Alaska waters they are killing so many species and destroying the environment they live in.

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