

On-Time Public Comment List
Prince William Sound and Upper Copper/Upper Susitna Finfish
December 3–8, 2014

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November 20, 2014

Via fax: 907-465-6094

RE: Whittier Boat Owners Association's public comment regarding Proposal 5 – 5 ACC 55.023 to exclude sport fishers from fishing inside Alaska Fish and Game regulatory markers approximately 100 feet seaward of the Main Bay Hatchery barrier net.

Board of Fisheries:

The Whittier Boat Owners Association (WBOA) submits the following comments regarding the Prince William Sound Aquaculture Association's (PWSAC) proposal (Proposal 5 - 5 ACC 55.023) to restrict sport fishing to areas outside the Alaska Department of Fish and Game regulatory markers situated approximately 100 feet seaward of the Main Bay Hatchery (MBH) broodstock holding barrier net. The WBOA has serious issues with this proposal.

The Main Bay Hatchery is owned by the State of Alaska. Despite PWSAC's contention that the hatchery is operated at no cost to the state, each year, through legislative grants and other direct and indirect funding, the state pours hundreds of thousands of dollars of public funds in to the Main Bay Hatchery and other Prince William Sound hatcheries. The public directly contributes to the maintenance and operation of the MBH is entitled to equal participation in the hatchery production. PWSAC doesn't mention the regulatory and enforcement costs associated with the fishery that the state bears.

Many WBOA members have annually participated in the Main Bay red salmon sport fishery since the early eighties. They drove their boats to the extreme head of Main Bay, hundreds of yard inside of the present barrier net location and fished from the shoreline and from their boats in the furthest southwest corner of the bay. They know that this proposed regulation will destroy the Main Bay sport salmon fishery because it is nearly impossible to snag red salmon in saltwater unless they are yarded up in dense schools. That only occurs in front of the barrier net or at the head of the bay. PWSAC has improperly closed the head of the bay to sport fisher since they began placing the barrier net across the bay. Now the fish school up at the barrier net. Fishing anywhere other than at the absolute head of Main Bay or adjacent to the barrier seine is fruitless. Pushing sport and subsistence fishers away from the barrier net will destroy what remains of this fishery. PWSAC will have basically appropriated a large swath of public land and resources.

Prince William Sound Aquaculture Association concedes in its proposal that there is a "growing sport fishery" adjacent to the Main Bay barrier seine. However, it is not just a "growing" sport fishery. The recreational fishery they are proposing to basically eliminate is a well-established and very-popular sport fishery, one that is utilized by thousands of sport fishers. Many people depend on this fishery for their annual subsistence salmon harvest. The combined take by the sport and subsistence fisheries in Main Bay is less than 2% of the annual Main Bay harvest.

More salmon are killed and maimed each season by the barrier net itself than all of the fish taken by sport fishers. Each season, thousands of fish become entangled in the barrier net and die. See attached



photos. Others are seriously injured by the barrier net but eventually work free and join the broodstock. If PWSAC wants to prevent injured fish that “may” introduce disease from mingling with the broodstock, then they should eliminate the barrier net...not sport fishers. In fact, sport fisher catch and utilize countless fish that have been injured by seine and drift nets. What’s good for the goose.....

PWSAC claims it is necessary to eliminate sport fishing in this area to prevent the barrier seine from becoming fouled by hooks and anchors, and to prevent snagging injury to fish which then can no longer be used for brood stock. No doubt, hooks and occasional anchors foul the barrier seine, and some snagged salmon escape to mingle with brood stock, but that does not justify eliminating the sport fishery . Both of these concerns could be eliminated by allowing dipnetting adjacent to the barrier net rather than excluding non-commercial fishers. Furthermore, the stated biological concern is bogus given the enormous number of fish injured by nets that escape to mingle with broodstock. Furthermore, the huge number of salmon yarded up within the barrier net in the dozens of acres of public waters MBH has illegally closed far exceeds the number of broodstock needed for the hatchery. This proposal is really about money. PWSAC wants more fish for their members and particularly for the cost-recovery seiners. This proposal is disingenuous and deceptive.

MBH also suggests the proposed restriction is similar to that the Lake Bay hatchery. The area closed to fishing in Lake Bay is a small fraction (probably around 10%) of the area proposed for closing in Main Bay. Plus there is not much record of motorized vessel use in the small area closed in Lake Bay as there is in Main Bay.

By pursuing this regulation, PWSAC risks opening the door to lawsuits challenging the installation of the barrier net. The Army Corp of Engineers has no record that MBH ever applied for or received a necessary permit for the barrier net installation. Furthermore, the Corp states that the barrier net does not qualify as an aquaculture-farm installation that could be permitted under the state permitting program, because MBH is not an aquaculture farm and the barrier nets cause more than an insignificant barrier to navigable water. There is also no evidence that MBH obtained Marine Mammals Protection Act and the Endangered Species Act permits when they installed the barrier net. These permits are required because the net excludes endangered Steller sea lions and depleted harbor seals from their feeding areas and impedes their free travel. To compound these issues, for years MBH installed an illegal cork line in the general location of the boundary they now propose. They were forced to remove the cork line by ADF&G. They also posted illegal signs that stated that no fishing was allowed within 100 feet of the barrier net. The Board of Fisheries must not reinforce MBH’s habitually improper behavior by allowing them to improperly appropriate more public domain and resources.

Chris Pallister,

Vice President

Whittier Boat Owners Association





Submitted By
Chitina Dipnetters Assn.
Submitted On
11/21/2014 2:11:54 PM
Affiliation

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Proposal 42 **OPPOSE**

This proposal would lower the Chitina Personal Use Dip Net Fishery (CDPUF) allocation to 100,000 salmon

The allocation of salmon for the CDPUF is based on need and to allow for growth in the fishery. The author of this proposal sites no factual data, only conjecture, justifying the claim that fishery openings in the CDPUF significantly affect the numbers of salmon available for harvest by the upriver subsistence fisheries.

The claim that the number of permits issued in the CDPUF has increased to over 10,000 does not take into the fact that in recent years only 1/2 to 2/3s of those permittees actually fished.

The claim of over harvest by the CDPUF is refuted by the fact that over the last 10 years, in the Copper River, there has been an average annual salmon surplus of 250,000 fish above the in-river goal.

The CDPUF fishery opening times and lengths are abundance based and determined by using pre-season daily salmon passage estimates coupled with actual daily sonar counts. and in determining these fishing season opener times and lengths for the CPUDF, the Alaska Dept. of Fisheries has already accounted for fish needed in the upriver subsistence fisheries



Chitina Dipnetters Association comments on 2014 Prince William Sound and Upper Copper River Finfish Proposals.

Chitina Dipnetters Association
1002 Pioneer Rd.
Fairbanks, AK 99701
Chuck Derrick-- president
Ph. 907-488-3093

Prop. 1 Oppose
Change to the Copper River district subsistence season

As regulations dealing with the Copper River District (CRD) subsistence season exist now, there is no lack of reasonable subsistence opportunity. Most subsistence fishing around Cordova is done using 50' gill nets. The number of days already open to subsistence fishers is plenty of opportunity to fill their bag limit of 15 salmon for a household of one, 30 for a household of 2 or more plus 10 salmon for each additional household member. This is especially true using a gill net to harvest. Also, many Cordova families are commercial fishers and are allowed, for family consumption, unlimited salmon under **homepack** regulations.

Prop. 18 Support
Halt the practice, termed **rolling up kings**, of hanging drift gill nets so loosely that king salmon are entangled, not gilled.

The practice of rolling up kings by drift gill netters, in the CRD, subverts an early 1990s regulation meant to reduce the king salmon harvest. That regulation limits gill nets used in the Copper River District to a maximum stretch mesh of 6". Besides the mesh size, only the length and depth of the net is regulated. Nowhere in regulation does it address the amount of mesh hung on the float line, making it legal to entangle kings in loosely hung gill nets. With the low run of king salmon to the Copper River in the last 6 years, the fact that king salmon are an easy target as they mill in the mouth of the Copper River inside of the barrier island and the fact that even in the 1990s the Alaska Board of Fisheries saw fit to protect king salmon entering the Copper River from over harvest, this practice of rolling up kings needs to be stopped.

Prop. 33 Support
Establish a king salmon Optimal Escapement Goal (OEG) in the Copper River of 28,000

An OEG of 28,000 king salmon would help king salmon stocks in the Copper River rebound from the past 6 years of low returns.

Prop. 35 Oppose
Prohibit the use of mono-filament webbing in dip nets

A majority of dip netters today use dip nets with mono-filament webbing. The difficulty in removing



fish from these nets occurs mainly with smaller sockeye when they become gilled. The larger sockeye and king salmon do not get gilled and thus are removed fairly easily from these nets. There is no evidence that mono-filament over other types of mesh increases released king salmon mortality.

Prop. 36 Oppose

Make it illegal to remove a king salmon from the water if intending to release it from a dip net

This proposal not only would create an enforcement nightmare but shows that the author of this proposal has never dip netted in the turbulent waters of the canyon within the Chitina Personal Use Dip Net Fishery (CPUDF).

Prop. 37 Oppose

Create a check station at Chitina to monitor daily harvests in the CPUDF and the Glennallen sub-district.

The CPUDF is managed using pre-season daily estimates coupled with actual daily sonar counts from the Miles Lake sonar. Fish and Game has never managed the fishery using daily harvest reports. A check station would not only be costly, but of little use in managing our fishery.

Prop. 38 Support

Re-set the CPUDF opening date back to “earliest June 1 and the latest June 7.

Prior to 2011 the earliest the CPUDF season opened was June 1 and the latest June 7. In 2011 The BOF changed the opener to the earliest June 7 and the latest June 15 in response to complaints from up river subsistence fishers that too few early salmon were making it to their fishery, as if the CPUDF was at fault.

From 2007- 2011 the average harvest in the CPUDF for the first week of June, was 2,572 salmon. As a comparison, in 2014 at the end of the first week in June the commercial drift gill net fleet in Cordova had already harvested 670,000 salmon. Since through radio telemetry and standard salmon tagging the Department of Fish and Game has determined that the majority of the earliest salmon arriving in the Copper River are those salmon which travel to spawning grounds farthest upstream, the early commercial harvest is the determining factor as to how many salmon arrive in the upriver subsistence fisheries, not the small harvest taken in the CPUDF. If sonar counts indicate that there are adequate numbers of salmon moving upstream for the CPUDF to open during the first week in June, then dip netters should be allowed to fish.

Prop. 39 Support

Increase the CPUDF bag limit to reflect household size

In the Copper River over the last ten years there has been a 250,000 salmon average annual surplus above the in-river goal. This proposal raises the CPUDF bag limit to match the South Central dip net fishery a much more family size oriented bag limit. The increase would only mean a family of two could take 5 more salmon than the current bag. Where currently a larger family is only allowed, 30 salmon, the same number of salmon as a family of two, the new bag limit would take into account the



size of ones family and allow 10 more salmon for each additional household member. If approved the CDA has in its proposal suggested the elimination of the current allowance for supplemental periods where a permit holder, if the sonar counts warrant, was allowed to take 10 additional salmon. This elimination of supplemental periods would help offset any increase in harvest due to the new bag limit. The CPUDF is an Alaska resident only fishery supplying salmon for family consumption and with such large surpluses of salmon occurring in the Copper River there is good incentive to pass this proposal.

Prop. 40 Oppose
Require harvest logs of Chitina dip net charter operators

Harvest data is already supplied on each personal use dip net permit There is no reason to place this extra burden on the one Chitina dip net charter operator.

Prop. 41 Support
Repeal the regulation reducing the CPUDF allocation to 50,000 salmon if the Cordova commercial fleet is prohibited from fishing for 13 consecutive days or more.

We remind the BOF that the CPUDF is managed by abundance. Fishing times are established using preseason daily estimates coupled with actual daily sonar counts. If the Cordova commercial drift gill net fleet is not allowed to fish because of poor salmon numbers, then this will also be reflected in low sonar counts and the closing or reduction of fishing times in the CPUDF. For this reason there is no valid justification for reducing the CPUDF salmon allocation for the rest of the season because the commercial fleet is not fishing. Only once, 2008, has the commercial fleet in Cordova not been allowed to fish for 13 consecutive days or more and by the end of the 2008 salmon run, the escapement count showed 140,000 salmon surplus above the 2008 inriver goal. 13 consecutive days does not dictate the number of fish remaining to show up during the rest of the summer. Two bad weeks of poor salmon returns does not dictate the rest of the run.

Prop. 43 Support
Allocate 3,000 king salmon to the CPUDF

The CPUDF king salmon bag limit up until 1996 was 5. In 1996 it was reduced to 4 and in 1999 reduced to 1. The 1999 one king limit was based on a BOF determination of the king salmon ANS "amount necessary for subsistence" for the Chitina dip net fishery after the fishery was shown to meet customary and tradition criteria qualifying the fishery for subsistence classification. Two years later after the BOF rescinded that subsistence classification for the dip net fishery, the one king limit was left in place.

The one king limit may be a major factor in why many Chitina dip netters have left the personal use fishery to rather dip in the Glennallen subsistence fishery where the bag limit is 5 kings. In the last 6 years fishers in the CPUDF were only allowed to retain a king in the first 1-3 weeks of the season. In order to let Chitina dip netters harvest unhindered their 1 king salmon the CDA was left with no options other than to ask for a king salmon allocation. The CPUDF has the lowest king bag limit of any in-river fishery.



Prop. 44 Support

Open the commercial fishing season only after at least one salmon has been counted passing the Miles Lake sonar

Prop. 45 Oppose

Rescind the regulation calling for mandatory commercial inside closures

In the last 2 years the Cordova commercial drift gill net fleet has been restricted to fishing outside the closure area till the majority of the king run has moved upriver and still have harvested an average of 10,000 king each year. The inside closure areas' shallow low tide waters affords commercial fishers easy harvest of large numbers of king salmon as they school and mill near the mouths of the Copper River before heading upstream. With the recent poor king salmon returns to the Copper, the inside closure restrictions must remain in place if we are ever to see a rebound in king numbers

Prop. 46 Support

Limit the commercial king homepack to the sport fish king bag limit for that area.



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:

1.A.2.(AKRO-RNR)

NOV 19 2014

Mr. Karl Johnstone, Chairman
ATTN: Alaska Board of Fisheries Comments
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Johnstone:

A number of proposals before the Board of Fisheries (BOF) for the December 3-8, 2014 meeting in Cordova may affect or have the potential to affect National Park System lands and resident zone communities in Southcentral Alaska. The National Park Service (NPS) is the land managing agency for Wrangell-Saint Elias National Park and Preserve (WRST), which contains part of the headwater area of the Copper River drainage. This conservation system unit is partially within the State's Upper Copper River/Upper Susitna River Management Area. We share with you the desire to implement a sound management strategy for the fishery resources of this management area.

Many of the proposals before the BOF that address fishery issues for the Upper Copper River area and adjacent to or within the WRST are being addressed through a letter from the Office of Subsistence Management. The NPS agrees with the recommendations in that letter.

Enclosed are the NPS comments on proposal # 55, which potentially affects fish resources within the Tebay River drainage within WRST. We appreciate your consideration of our comments. If you have any questions about these comments, please contact Bud Rice, Management Biologist (644-3597) or Molly McCormick, Fisheries Biologist (822-7280).

Sincerely,

Debora Cooper
Associate Regional Director

Enclosure

cc's: see page 2



cc:

Cora Campbell, Commissioner, ADF&G

Pat Pourchot, Special Assistant to the Secretary for Alaska

Tim Towarak, Chair, Federal Subsistence Board

Glen Haight, Executive Director, Boards of Fish and Game

Jeff Regnart, Director, Commercial Fisheries Division, ADF&G

Charles Swanton, Director, Division of Sport Fish, ADF&G

Hazel Nelson, Director, Division of Subsistence, ADF&G

Rick Obernesser, Superintendent, Wrangell-Saint Elias National Park and Preserve

Molly McCormick, Fisheries Biologist, Wrangell-Saint Elias National Park and Preserve

Guy Adema, Natural Resources Program Manager, NPS

Mary McBurney, Subsistence Program Manager, NPS

George Pappas, Fisheries Division Chief for the Office of Subsistence Management

Bud Rice, Management Biologist, NPS

Joel Hard, Deputy Regional Director, NPS

Bert Frost, Regional Director, NPS



**NATIONAL PARK SERVICE (NPS) COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
for the
PRINCE WILLIAM SOUND MANAGEMENT AREA**

**State of Alaska
Board of Fisheries Meeting
December 3-8, 2014
Cordova, Alaska**

Proposal 55 will change the bag and possession limits for rainbow/steelhead trout in Bridge Creek, the outlet creek of Summit Lake within the Tebay River drainage, and align them with the regulations for Summit Lake. This proposal applies only to those fishing under the State's sport fish regulations.

Existing State Regulation:

5 AAC 52.022. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area

(a) Unless otherwise specified in 5 AAC 52.023, or by an emergency order issued under AS 16.05.060, the following are the seasons, bag, possession, annual, and size limits, and method and means that apply to sport fishing for finfish in the Upper Copper River and Upper Susitna River Area:

(5) rainbow/steelhead trout: may be taken from January 1 – December 31; bag and possession limit of two fish, of which only one may be 20 inches or greater in length

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits and methods and means for the Upper Copper River and Upper Susitna River Area.

(23) in the Tebay River drainage,

(A) in Summit Lake, the bag and possession limit for rainbow/steelhead trout is 10 fish, of which only one may be greater than 18 inches in length

Existing Federal Regulations:

§ .27(e)(11) Prince William Sound Area

(i) You may take fish, other than rainbow/steelhead trout, in the Prince William Sound Area only under authority of a subsistence fishing permit, except that a permit is not required to take eulachon. You may not take rainbow/steelhead trout, except as otherwise provided for in paragraph (e)(11) of this section.



(iii) If you catch rainbow/steelhead trout incidentally in other subsistence net fisheries you may retain them for subsistence purposes, unless restricted in this section.

(vi) Rainbow/steelhead trout and other freshwater fish caught incidentally to salmon by fish wheel in the Upper Copper River District may be retained.

(vii) Freshwater fish other than rainbow/steelhead trout caught incidentally to salmon by dip net in the Upper Copper River District may be retained. Rainbow/steelhead trout caught incidentally to salmon by dip net in the Upper Copper River District must be released unharmed to the water.

Is a similar issue being address by the Federal Subsistence Board (FSB)? No.

Impact to NPS-qualified subsistence users/fisheries: None.

Federal subsistence regulations prohibit Federally-qualified subsistence users residing in Wrangell-St. Elias National Park resident zone communities from harvesting rainbow/steelhead trout in the Tebay River drainage. Any trout harvested here by these residents would be harvested under State sport fishing regulations.

NPS position/recommended action: Support.

The NPS supports this proposal for resource conservation and to advance well-reasoned management objectives. Rainbow/steelhead trout were introduced to Summit Lake in the 1950s-60s. By the mid-1980s the lake was known for producing exceptionally large trout. The population's age structure changed, however, and by 1999 the population was dominated by stunted fish <10 inches in length. The Alaska Department of Fish and Game, with the approval of Wrangell-St. Elias National Park & Preserve, has removed trout from the lake for 11 of the past 12 years. This now discontinued project created a bimodal size distribution of smaller and larger trout. An appropriate management strategy to increase the numbers of larger trout, by changing the bag limit to 10 fish only one of with may be greater than 18 inches in length, was adopted by the Alaska Board of Fisheries in 2011. Also adopted at the same Board of Fisheries' meeting was the removal of the spring spawning closure and increase the minimum size to retain trout from 12 inches to 14 inches. Both of these management strategies were designed to increase the numbers of larger trout in Summit Lake and were appropriate management objectives for this lake. This proposal would align the sport fishing regulations for Summit Lake with Bridge Creek, where some of the sport fishing currently takes place under a different set of regulations, thus providing a good management strategy for maintaining the desired population structure and overall size.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503-6199



IN REPLY REFER TO:

FWS/OSM 14032.GP

NOV 21 2014

Mr. Karl Johnstone, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Johnstone:

The Alaska Board of Fisheries will consider 57 proposals, among other issues, at its Prince William Sound and Upper Copper River/Upper Susitna River Finfish meeting beginning December 3, 2014.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed the proposals and developed the enclosed preliminary comments on proposals which may have an effect on Federal subsistence users and fisheries in these areas. We may wish to comment on other proposals if issues arise during the meeting which may have an effect on Federal subsistence users and fisheries.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Eugene R. Peltola, Jr.
Assistant Regional Director, OSM

Enclosure

cc: Cora Campbell, ADF&G
Tim Towarak, Chair FSB
Lisa Olson, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Jeff Regnart, ADF&G, Anchorage
Charles Swanton, ADF&G, Juneau
Glenn Haight, ADF&G, Juneau
Drew Crawford, ADF&G, Anchorage
Chuck Ardizzone, DARD, OSM
Jennifer Yuhas, ADF&G, Fairbanks
Interagency Staff Committee
Administrative Record



**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
FOR THE
PRINCE WILLIAM SOUND AND UPPER COPPER RIVER/SUSITNA
MANAGEMENT AREAS**

**State of Alaska
Board of Fisheries Meeting
Cordova, Alaska**

December 3-8, 2014



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Federal Comments

The following comments address these proposals only as they affect Federally-qualified subsistence users and resource conservation.

Proposal 33 requests the establishment of a Biological Escapement Goal (BEG) of 28,000 Chinook salmon for the Copper River drainage. The proponent indicates the current Sustainable Escapement Goal (SEG) of 24,000 Chinook salmon is too low and is based upon depleted runs. The proponent indicates the escapement goal should be more in line with historical escapement numbers.

Current State Regulation:

5 AAC 24.361. Copper River King Salmon Management Plan

(a) The department shall manage the Copper River commercial, sport, personal use, and subsistence fisheries to achieve a sustainable escapement goal of 24,000 or more for king salmon. For the purposes of managing these fisheries, the department shall consider the best available information regarding harvest, age composition, and escapement, including escapement information obtained from mark-recapture studies, aerial surveys, or by other means.

Current Federal Regulation:

50 CFR §100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.



Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. Chinook salmon are harvested by Federally-qualified subsistence users in both the Chitina and the Glennallen Subdistricts. Federal subsistence fisheries regulations for the Upper Copper River Area do not include a Chinook salmon escapement goal for the Copper River and management of the Federal subsistence fisheries is based upon the Alaska Department of Fish and Game's established escapement goals and run estimation programs.

Increasing the Copper River Chinook salmon escapement goal by 4,000 fish may lead to reduced opportunity for Federally-qualified subsistence users to harvest Chinook salmon in the upper portions of the Copper River watershed, particularly during years of low abundance.

Federal position/recommended action: Neutral. Adoption of this proposal may allow additional Chinook salmon to escape and spawn in the Copper River watershed, and if the new escapement goal is accurate and results in additional production, Federally-qualified subsistence users may benefit from potentially increased future yields.

Conversely, adoption of this proposal may lead to additional restrictions and loss of harvest opportunity for Federally-qualified subsistence users during years of low Chinook salmon returns to the Copper River. Additionally, if this proposal is adopted and the new escapement goal results in reduced overall Chinook salmon production, Federally-qualified subsistence users may lose an undetermined amount of opportunities in future years.

Federal Subsistence Management Program staff support conservation of the resource; however, adoption of the proposal may not be possible as the Board of Fisheries does not set Biological Escapement Goals. Biological Escapement Goals are set by the Alaska Department of Fish and Game. It is our understanding that the Board of Fisheries may choose to put the goals into regulation as is, or may choose to raise or lower them for various reasons.

PROPOSAL 34 seeks to amend the Copper River King Salmon Management Plan to provide additional management measures in the Glennallen Subdistrict subsistence fishery to reduce Chinook salmon harvest in the Glennallen Subdistrict State subsistence salmon fishery. Proposed restrictions include establishing a bag limit for Chinook salmon taken by a fish wheel, reducing bag limits for Chinook salmon taken by fish wheel or dip net, prohibiting the retention of Chinook salmon taken by either a fish wheel or dip net, and modifying methods and means when warranted.

Current State Regulation:

5 AAC 24.361. Copper River King Salmon Management Plan.

(e) In the Glennallen Subdistrict subsistence salmon fishery, if the commissioner determines that additional conservation measures are necessary to achieve the escapement goals, the commissioner may, by emergency order, close the Glennallen



Subdistrict subsistence fishery season and immediately reopen a season during which the retention of king salmon is prohibited or methods and means are modified to reduce king salmon harvest in the Glennallen Subdistrict subsistence salmon fishery.

Current Federal Regulation:

(x) The total annual harvest limit for subsistence salmon fishing permits in combination for the Glennallen Subdistrict and the Chitina Subdistrict is as follows:

(A) For a household with 1 person, 30 salmon, of which no more than 5 may be Chinook salmon taken by dip net and no more than 5 Chinook taken by rod and reel;

(B) For a household with 2 persons, 60 salmon, of which no more than 5 may be Chinook salmon taken by dip net and no more than 5 Chinook taken by rod and reel, plus 10 salmon for each additional person in a household over 2 persons, except that the household's limit for Chinook salmon taken by dip net or rod and reel does not increase;

(C) Upon request, permits for additional salmon will be issued for no more than a total of 200 salmon for a permit issued to a household with 1 person, of which no more than 5 may be Chinook salmon taken by dip net and no more than 5 Chinook taken by rod and reel, or no more than a total of 500 salmon for a permit issued to a household with 2 or more persons, of which no more than 5 may be Chinook salmon taken by dip net and no more than 5 Chinook taken by rod and reel.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: No. Federal subsistence harvest and possession limits for salmon for waters under Federal subsistence fisheries jurisdiction in the Copper River drainage are established in Federal regulation and supersede State subsistence fishing regulations.

Federal position/recommended action: Support. Adoption of this proposal will provide the Alaska Department of Fish and Game managers additional tools to restrict the Glennallen Subdistrict subsistence salmon fisheries use during times of Chinook salmon low abundance requiring conservative management actions. The Federal Subsistence Management Program supports conservation of the resources, and utilization of meaningful in-season management tools and options necessary to respond to variable Chinook salmon returns to the Copper River. The Federal subsistence management program comments for this proposal are limited to supporting approval of various management tools and options to address conservation concerns for Copper River Chinook salmon. Comments for this proposal do not address application of the proposed management tools.

PROPOSAL 35 seeks to prohibit the use of monofilament mesh in dip net bag webbing in subsistence and personal use salmon fisheries of the Copper River for the purpose of Chinook salmon conservation.



Current State Regulations:

5 AAC 01.620. Lawful gear and gear specifications

(b) Salmon may be taken only by the following types of gear:

(1) in the Glennallen Subdistrict by fish wheels or dip nets;

5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans;

(i)(4) fish wheels and dip nets only may be used on the Copper River; dip nets and spears only may be used in Tanada Creek;

5AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

(c) Salmon may be taken only with dip nets.

5 AAC 39.105. Types of legal gear (under general provisions)

(24) a dip net is a bag-shaped net supported on all sides by a rigid frame; the maximum straight-line distance between any two points on the net frame, as measured through the net opening, may not exceed five feet; the depth of the bag must be at least one-half of the greatest straight-line distance, as measured through the net opening; no portion of the bag may be constructed of webbing that exceeds a stretched measurement of 4.5 inches; the frame must be attached to a single rigid handle and be operated by hand;

Current Federal Regulations:

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

(11) Prince William Sound Area. The Prince William Sound Area includes all waters and drainages of Alaska between the longitude of Cape Fairfield and the longitude of Cape Suckling.

(v) In the Upper Copper River District, you may take salmon only by fish wheels, rod and reel, or dip nets.

§100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions

Dip net means a bag-shaped net supported on all sides by a rigid frame; the maximum straight-line distance between any two points on the net frame, as measured through the net



opening, may not exceed 5 feet; the depth of the bag must be at least one-half of the greatest straight-line distance, as measured through the net opening; no portion of the bag may be constructed of webbing that exceeds a stretched measurement of 4.5 inches; the frame must be attached to a single rigid handle and be operated by hand.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. Federal subsistence methods and means are the same as those authorized in State regulations unless superseded. Currently the webbing material from which a dip net is constructed is not defined in Federal regulation. If this proposal is adopted, Federally-qualified subsistence users with out-of-compliance gear would be required to replace their dip net webbing, which could be a financial burden.

If this proposal is adopted, Federally-qualified subsistence users could be unnecessarily restricted if they do not have access to the appropriate materials. The Federal inseason manager could submit a Special Action request to the Federal Subsistence Board to temporarily change Federal regulations (effective for a maximum of 60 days) to allow continuance of using monofilament mesh for dip net webbing. However, a proposal would need to be submitted to the Federal Subsistence Board to place into regulation Federal subsistence fisheries methods and means to allow the use of monofilament mesh in dip nets.

Adoption of this proposal may result in public safety concerns for subsistence users because using larger gauge mesh or knotted twine mesh for dip net bag construction may increase drag against water current. Increasing the drag of a deployed dip net may require additional strength and agility to successfully use from a boat or from shore. Increasing the physical demands required to use a dip net in the Copper River, where the rapid currents and difficult terrain already demand extreme caution, may result in public safety concerns, e.g. physical injuries and/or water accidents. Little is published or known regarding this matter.

Federal position/recommended action: Oppose. Adoption of this proposal is unnecessary for the conservation of Chinook salmon or continuance of subsistence uses in the Copper River drainage. Adoption of this proposal would expectedly increase the cost to Federally-qualified subsistence users to participate in the fishery and increase concerns for public safety for participants in the fishery. The time and cost of the netting change needs to be addressed.

Additionally, little is published regarding the impacts monofilament mesh dip net bags have on live release of salmon. Some unknown amount of incidental handling mortality of Chinook salmon released from the dip net fisheries will happen. This amount may result in increasing conservation concerns during years of Chinook salmon low abundance potentially impacting continuance of subsistence uses for Federally-qualified subsistence users.

PROPOSAL 36 seeks to prohibit the removal of a Chinook salmon from the water in subsistence and personal use fisheries if it is to be released. The proponent indicates Chinook salmon are prone to injury from handling with a dip net during the release process. The proponent references the release of Chinook salmon from dip nets and did not discuss other legal



methods and means allowed under Federal subsistence regulations such as rod and reel and fish wheels. As proposed, all methods and means used would require release without removing the head of the fish from the water.

Current State Regulations:

No regulations address the release of Chinook salmon in the State managed subsistence or personal use fisheries.

Current Federal Regulations:

None identified. No regulations address the release of Chinook salmon in the Federal subsistence fisheries of the Copper River.

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. Adoption of this proposal would, by default, require Federally-qualified subsistence users to release Chinook salmon without removing the fish from the water. Requiring the release of Chinook salmon, when release is either voluntary or mandatory, without removal from the water could reduce handling mortality rates by some unknown amount.

The Chinook salmon handling mortality and potential spawning success detractors associated with the release from dip nets in the upper Copper River drainage are unknown. No information is available which suggests whether or not releasing a Chinook salmon from a dip net that has not been removed from the water has a greater survival and spawning rate.

Many Chinook salmon catch and release mortality rate studies are published regarding use of rod and reel. Federally-qualified subsistence users are authorized to use rod and reel as a legal methods and means to harvest Chinook salmon in the Copper River Federal subsistence fisheries. Recent Alaska Department of Fish and Game testimony to the Board of Fisheries emphasized catch and release mortality rates significantly depend upon the handling of the fish to be released among other factors. Requiring Federally-qualified subsistence users to not remove a Chinook salmon from the water prior to voluntary or mandatory release, as required in other fisheries in Alaska (e.g. Kenai River early run Chinook salmon Federal subsistence rod and reel fishery when slot limit is in effect), has been supported by the Federal Subsistence Program when demonstrated that this requirement is necessary for conservation of the resource.



Conversely, adoption of this proposal could potentially prohibit the use of fish wheels in the Copper River fisheries when Chinook salmon are present, as it is not possible to operate a fish wheel without fish being removed from the water.

Though this proposal was submitted to address conservation issues, adoption of this proposal may result in a public safety issues for Federally-qualified users who use dip nets or rod and reel in the Copper River Federal subsistence salmon fisheries. Requiring the release of a Chinook salmon out of a net (either dip net or landing net) without removal from the water may be challenging in dangerous conditions such as shore dip netting from steep and slippery embankments or from a boat operating among navigation hazard filled swift currents.

Federal Position/Recommended Action: Support Proposal 36 with modification.

The Federal Subsistence Management Program staff support conservation of the resource through establishing release restrictions to reduce handling mortalities for fish stocks with conservation concerns and/or are in low abundance. If the Alaska Department of Fish and Game determines adoption of the proposal would positively affect the viability and reproductive potential of the fish populations and additional regulatory changes are warranted for conservation of spawning fish populations, the Federal Subsistence Management Program would support a modification of Proposal 36.

The Federal Subsistence Management Program supports regulatory action that may increase catch and release survival rates of Chinook salmon in the Copper River, especially during years of low abundance. The Federal Subsistence Management Program therefore recommends modifying Proposal 36 to require fishermen to release Chinook salmon without removal from the water for all Copper River fisheries which allow the use of rod and reel or dip nets only during times when retention is prohibited or if the fish is to be voluntarily released. The recommended modification to this proposal would exempt fish wheels because fish wheels are designed to lift fish out of the water before delivering the harvest to a dry or wet storage area.

PROPOSAL 38 seeks to change the opening date for the Chitina Subdistrict personal use salmon fishery to as early as June 1, but no later than June 11. The proponent seeks additional early season opportunity to harvest in the Copper River personal use dip net fishery.

Current State Regulation

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

(b) Salmon may be taken from June 7 through September 30. The commissioner shall establish a preseason schedule, including fishing times, for the period June 7 through August 31 based on daily projected sonar counts at the sonar counter located near Miles Lake. This abundance-based preseason schedule will distribute the harvest throughout the season. The commissioner may close, by an emergency order effective June 7, the Chitina Subdistrict personal use salmon fishing season and shall reopen the season, by emergency order, on or before June 15 depending on the run strength and timing of the

sockeye salmon run. Adjustments shall be made to the preseason schedule based on actual sonar counts compared to projected counts. If the actual sonar count at Miles Lake is more than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which additional fishing times will be allowed. If the actual sonar count at Miles Lake is less than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which fishing times will be reduced by a corresponding amount of time.

Current Federal Regulations:

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§100.27 Subsistence taking of fish.

(e)(11) Prince William Sound Area. The Prince William Sound Area includes all waters and drainages of Alaska between the longitude of Cape Fairfield and the longitude of Cape Suckling.

(e)(11)(ix) You may take salmon in the Upper Copper River District from May 15 through September 30 only.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. Adoption of this proposal will reverse the 2011 Board of Fisheries decision to delay the earliest regulatory start date of the Copper River personal use dip net fishery to allow for passage of early arriving sockeye salmon into the upper watershed escapement and to provide for additional State and Federal subsistence fisheries opportunity.

Adoption of this proposal could negatively impact residents of Wrangell-St. Elias resident zone communities and other Federally-qualified subsistence users who fish in the Glennallen Subdistrict. Adoption of this proposal could reduce Federal subsistence users' early season harvest success during the first week of June due to competition with the State personal use fishermen resulting in less salmon available for harvest upriver of the State personal use fishery.

Federal Position/Recommended Action: Oppose. Re-establishing the opening date of June 1 for the Chitina Subdistrict personal use fishery could reduce Federal subsistence users' early season harvest success rates in the Glennallen Subdistrict. Maintaining the current regulatory opening date of June 7 sustains increased Federal subsistence users' harvest success rates during the first week of June.

The Federal Subsistence Management Program supports sound abundance based fisheries management and would support opening the Chitina Subdistrict personal use fishery by emergency order if managers determine an unforeseen harvestable surplus significantly above the preseason forecast becomes available during the first week of June. Additionally, if a significant harvestable surplus is forgone and escapement goals are substantially exceeded, future production may be reduced resulting in conservation concerns and challenges to continuance of subsistence uses by Federally-qualified subsistence users.

PROPOSALS 50 and 51. Proposal 50 seeks to prohibit the use of barbed hooks, multiple hooks, and bait when fishing for Chinook salmon in the Upper Copper/Upper Susitna Area. Proposal 51 seeks to prohibit use of barbed and multiple hooks for Chinook salmon once an angler has taken a bag limit or annual limit of Chinook salmon from the Upper Copper River and Upper Susitna River Area.

Current State Regulations:

5 AAC 52.022. General provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

(a)(3) king salmon: may be taken only from January 1 - July 19, as follows;

(A) 20 inches or greater in length; bag and possession limit of one fish; annual limit of four fish; a harvest record is required as specified in 5 AAC 75.006; a king salmon 20 inches or greater in length that is removed from the water must be retained and becomes part of the bag limit of the person originally hooking it;

(B) less than 20 inches in length; bag and possession limit of 10 fish;

(C) in all waters, a king salmon that is removed from the water must be retained and becomes part of the bag limit of the person that originally hooked the fish; a person may not remove a king salmon from the water before releasing the fish;

Current Federal Regulations:

§100.27(e)(11)(v) In the Upper Copper River District, you may take salmon only by fish wheels, rod and reel, or dip nets.

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

Regional Federal Subsistence Regulation Differences

Regional differences exist for Federal subsistence fisheries management. The Southeast Alaska Subsistence Regional Advisory Council supported regulations requiring users to retain Federally regulated fish species caught while using rod and reel with bait to reduce catch and release mortality rates. Once the daily, seasonal, or annual harvest limit for that species is met, the Federally-qualified subsistence users may no longer fish with bait. Additionally, for streams with steelhead, once the daily or annual limit of steelhead is met, Federally-qualified subsistence users may no longer fish with bait for any species. For conservation purposes (e.g. steelhead or high use fisheries), certain Federal subsistence fisheries in Southeast Alaska have bait use prohibitions to assist live release of landed catch.

Catch and Release Issue Related Federal Subsistence Fishery Regulations for Southeast Alaska

§_____100.27 *Subsistence taking of fish.*

(e)(13) Southeastern Alaska Area. The Southeastern Alaska Area includes all waters between a line projecting southwest from the westernmost tip of Cape Fairweather and Dixon Entrance.

(iv) In areas where use of rod and reel is allowed, you may use artificial fly, lure, or bait when fishing with rod and reel, unless restricted by Federal permit. If you use bait, you must retain all Federally regulated fish species caught, and they apply to your applicable daily, seasonal, and annual harvest limits for that species.

(A) For streams with steelhead, once your daily, seasonal, or annual limit of steelhead is harvested, you may no longer fish with bait for any species.

Is a similar issue being addressed by the Federal Subsistence Board? Partially. The barbless portion of these proposals is being addressed by the Federal Subsistence Board through Fisheries Proposal FP15-01. Proposal FP15-01 proposes establishing the definition of a hook in statewide Federal subsistence regulations. Creating a definition for a hook to include multiple points with or without a barb in Federal regulation would allow Federally-qualified subsistence users to continue to use multiple barbed hooks in Federal subsistence fisheries where rod and reel are a legal methods and means to harvest fish when the State managed fisheries are restricted to use of a single barbless hook. Adoption of FP15-01 would permanently address situations where Federally-qualified subsistence users are restricted to State fisheries regulations by default regarding the use of multiple barbed hooks.

The issue of using bait is currently being addressed by the National Park Service through a rule-making process. Currently, the National Park Service is seeking public comments on modifying National Park Service regulations which address the use of bait as follows:

The proposed language currently released for public review follows:

36 CFR §13.40 Taking of fish.

(d) Use of native species as bait. Use of species native to Alaska as bait for fishing is allowed in accordance with applicable Federal law and non-conflicting State law and regulation.

This bait portion of the proposed ruling is further described as:

(6) Allow the use of native species to be used as bait, commonly salmon eggs, for fishing in accordance with non-conflicting state law. This would supersede for park areas in Alaska the Service-wide prohibition on using certain types of bait in 36 CFR 2.3(d)(2).

Impact to Federal subsistence users/fisheries: Yes. Copper River Area Federal subsistence fisheries methods and means regulations are the same for taking of fish under State of Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57), unless specifically modified in Federal regulation. Adoption of this proposal could, by default, restrict the few Federal subsistence fishermen targeting Chinook salmon with rod and reel in the Copper River to some combination of use of single, barbless, or bait free hooks.

Single, barbless, bait free hooks are used to minimize injury to fish in catch-and-release sport fisheries, and are not as effective as barbed hooks in retaining fish for harvest. In general, the requirements for single, barbless hooks and prohibiting the use of bait have been used to reduce angler efficiency and mortality of targeted or incidentally hooked fish. Requiring the use of barbless hooks, single hooks only, and/or prohibiting the use of bait by Federally-qualified subsistence users would reduce their ability to efficiently harvest fish. Efficient harvest of wild renewable resources is one of the principles of subsistence use.

Federal position/recommended action: Neutral. Adoption of either proposal to restrict State managed fisheries methods and means to some combination of a single, barbless hook, without bait may initially restrict the few Federally-qualified subsistence users who choose to harvest Chinook salmon with a rod and reel in the Copper River.

Federal Subsistence Management Program staff support conservation of the resource, however; adoption of either proposal appears to be unnecessary for the Federal subsistence salmon fisheries in the Copper River unless single, barbless hook, and or bait restrictions for all users are necessary for conservation. Federal Subsistence Management Program staff could support methods and means restrictions for specific fisheries if the Alaska Department of Fish and Game determines such restrictions are necessary for conservation purposes.

If either proposal is adopted, the Federal inseason manager could issue an Emergency Special Action to temporarily change Federal regulations (effective for a maximum of 60 days) to allow for the use of multiple barbed hooks and bait in the Federal subsistence fisheries because the Federal Subsistence Board has not established specific terminal tackle restrictions for the Copper River Federal subsistence fisheries. A proposal would need to be submitted to the Federal



Subsistence Board to allow the continued use of existing methods and means by Federally-qualified subsistence users in the fishery.

If proposals to restrict sport fisheries methods and means as described are adopted, the action could result in divergence between Federal and State regulations which would increase regulatory complexity and enforcement concerns.



11-20-2014 The following are just some of the issues with the PSWAC request.

Issue # 01. Keeping in mind that the hatchery is "State owned" it should not be operated in such a manner that prevents sport fishermen from catching fish there which is what this request is all about.

By law, the mission of the Division of Sport Fish is to protect and improve the state's recreational fisheries resources. From ADFG fishing regs.

Issue # 02. "PSWAC installs and operates a barrier net approximately 400 feet seaward of the fish ladder."

The barrier net is not and never has been permitted by appropriate authority(Corp of Engineers) and is an illegal obstruction to the waters of the United States.

Issue # 03. "The barrier net functions as weir allowing the hatchery operator to collect and hold returning MBH salmon."

The barrier net is not necessary to hold the salmon. The salmon are returning to their stream of origin. They swim to and line up to reenter the fresh water stream into which they were born. The hatchery is where they were born.

Issue # 04. "The barrier net functions as a weir allowing the hatchery operator collect and hold." Since the fish are enroute to the hatchery and not going to return to the open ocean why does MBH really want to have a barrier seine? The answer is MBH wants to keep sport fisherman out.

Issue # 05. If MBH would maintain compliance with state and federal law they would not have to worry about snagging hooks and anchors.

Issue # 06. "Injured fish must be culled from the brood stock which results in a waste of the salmon resource."

I have pictures of approximately 4000 to 5000 salmon dead in the barrier seine. I am willing to provide pictures via email.

Please do not approve the MBH request!

John Coombes: I have had a boat in Whittier Harbor since 1984 and have fished and hunted PWS since then.

jcoombes845@gmail.com



ALASKA BOARD OF FISHERIES

PRINCE WILLIAM SOUND FINFISH

DECEMBER 3-8, 2014

Letter in Opposition to Proposal 5 - "Close a portion of Main Bay to sport fishing."

I have sport fished the head of Main Bay for nearly 20 years. It has become a tradition for my family, and several other families to meet there every single year to celebrate the 4th of July holiday, and catch our yearly Sockeye salmon.

Sockeye obviously congregate at the head of the bay, and provide an opportunity for people of all ages to successfully snag fish. This is not the case just a short distance from the head, as the fish are dispersed and the bay is thick with drift and set nets. This regulation will not "Close a portion of Main Bay to sport fishing." This proposal would effectively END the sport fishery in Main Bay, and anyone that has participated in this fishery for multiple years would agree. You simply cannot catch much outside of the head of the bay, and after the barrier net is installed (fish go in, but they can't get out), the only place a child (and sometimes anyone else) can actually get any fish is on the hatchery side of the net. Note, we have consulted ADF&G annually to confirm we are in compliance with the law before fishing behind the net.

The Eshamy district harvested 1.02 million sockeye this year. In addition, tens of thousands more fish die and rot behind the MBH barrier net. In contrast to these numbers, sport fishermen likely take less than a season total of 6 or 7 thousand fish (the number if 500 fishermen each harvested 2 daily limits, or 12 fish). Six tenths of one percent hardly seems a strain on the resource.

It is argued the 'integrity of the barrier net has often been compromised'. How, how often, and when, was this net ever compromised, much less breached? Are a few snagging hooks really a big problem? The only time I know of an anchor getting caught in the net, the boat owner cut his anchor line, informed MBH of the incident, and was told, "No worries, we'll pull the anchor when we pull the net at the end of the season". Which they did, and the anchor was later retrieved from their dock. No big deal. No damage (or compromise) to the barrier net.

It is pointed out "injured fish must be culled from broodstock...which results in a waste of the salmon resource". An overwhelming majority of the fish we sport catch are all injured by gill nets. We keep them. We eat them. They are not wasted. What does MBH do with the net damaged fish they cull? Also, how many snag injured fish could there even be, and if this is a valid concern, why do MBH employees and/or guests snag from their own docks (witnessed every year)?

It is apparent this proposal is introduced simply to put a stop to the sport fisherman nuisance in MBH, while providing zero enhancement of the fishery itself. It seems it might be a better proposal to instead remove the net, and let more fish become available for public consumption, vs. dying in and behind the barrier net (which is always choked with dead and dying fish).

Thank you for your consideration of this point of view. Please don't kill this sport fishery without just cause.

A handwritten signature in black ink, appearing to read "David Lofland".

David Lofland



Prince William Sound Setnetter's Association

The purpose of this association is to promote, develop, and enhance the setnet fishery in the Prince William Sound Area of Alaska. This non-profit association represents the interests of its members before various boards, agencies, and organizations dealing with the commercial and sport fisheries in Prince William Sound. Any person holding a set gillnet limited entry permit issued by the Alaska Commercial Fisheries Entry Commission for the Prince William Sound Administrative Area is eligible to become a member.

President: Scott Thomas, Treasurer/Secretary: Susan Harvey

November 6, 2014

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

RE: Proposed Changes in Regulations for the Department of Fish and Game
Proposal 10 – Changes to Allocation Plan

This letter responds to the Board of Fisheries request for comments on Proposed Changes in Regulations for the Department of Fish and Game. This letter provides comments from the Prince William Sound Setnetter's Association on Proposal 10 to change the allocation plan. We oppose Proposal 10, and urge the Board of Fisheries to reject this proposal.

The Prince William Sound Setnetter's Association opposes Proposal 10.

The Prince William Sound Setnetter's Association represents a group of set gillnet commercial fishermen in the Eshamy District. All members of the association oppose Proposal 10.

Proposal 10 recommends eliminating the 1% threshold for triggering penalty measures on the set gillnet gear group, while maintaining a 5% threshold for triggering penalty measures for both the drift gillnet gear group and seine gear group. Proposal 10 suggests an unfair regulatory proposal that would eliminate any margin of error prior to triggering penalties for the set gillnet gear group, while maintaining a substantially larger penalty trigger point buffer for the other gear groups. This proposal is inequitable by proposing to penalize the gear group with the smallest allocation to begin with. A 0% threshold for the set gillnet gear group would be unfair, while the other groups enjoy a 5% margin.

At the last Board of Fisheries Meeting in Valdez, we heard resounding support from most fishermen for no changes to allocation plan. We urge the Board of Fisheries to reject this proposal, and retain the current allocation plan because it is working.

Thank you for the opportunity to comment.

Sincerely,

Scott Thomas
PWS Setnetter's Association President
1852 E. 24th Ave., Anchorage AK 99508
(907) 279-0179

Sincerely,

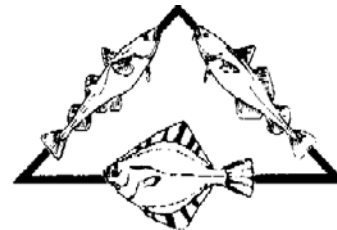
Susan Harvey
PWS Setnetter's Association Treasurer/Secretary
PO Box 771026, Eagle River, Alaska 99577
(907) 854-8998



Alaska Groundfish Data Bank

P.O. BOX 78

Julie Bonney, Executive Director jbonney@gci.net
Katy McGauley, Fisheries Biologist agdb@gci.net



Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

November 14, 2014

Dear Chairman Johnstone and Board Members,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and catcher vessels home ported in Kodiak that participate in the Prince William Sound (PWS) Pelagic Pollock Trawl fishery. The Kodiak processors and vessels have participated in the state managed PWS pollock fishery since its inception in 1995 and have demonstrated long term dependency on the fishery. The community of Kodiak benefits from both the landed catch and processed catch that occurs within the city of Kodiak. Thus not only are the Kodiak processors and harvesting vessels dependent on the PWS pollock fishery but also the overall community of Kodiak.

Our members have grave concerns regarding proposal 26 which would change the pollock trip limit from 300,000 pounds to 200,000 pounds. Reducing the trip limit will reduce the ex-vessel value of each pollock trip reducing the likelihood that vessels will continue to deliver pollock to both the city of Kodiak and the Kodiak processors. The reduced trip limit also increases inefficiencies, requiring harvesters to utilize more resources for less fish – with the high costs associated with fishing including the price of fuel this makes no economic sense.

ADFG staff have suggested that they have the necessary tools to manage the pace of the fishery allowing them to manage for both the guideline harvest level of pollock and the bycatch limits within the fishery. These tools include the check ins and check out system to monitor participation levels and fleet catches along with the department's ability to open and close the fishery for shorter fishing periods as needed. The Department has demonstrated their ability to manage the fishery effectively during the recent time clip from 2010 to 2013 with actual catches ranging from 94% to 102% of the pollock GHl and bycatch catches below the allowable bycatch caps.

AGDB members respectfully request that the Board reject proposal 26. We believe successful management of the fishery is not the core issue of this proposal – it is effectively an action that will only constrain full prosecution of the fishery, hurting vessels, processors, and Kodiak. We appreciate the opportunity to comment and look forward to engaging with the Board at the upcoming Prince William Sound meetings.

Sincerely,

Julie Bonney
Executive Director
Alaska Groundfish Data Bank



Office of the Mayor and Council

710 Mill Bay Road, Room 216, Kodiak, Alaska 99615

November 20, 2014

Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Regarding: Proposal 26 (Pollock Vessel Trip Limit)

Via: Email with original to follow by postal mail

Dear Chair Johnstone and Board Members:

The City of Kodiak and the Kodiak Island Borough have received input from local stakeholders who participate in the Prince William Sound (PWS) pollock fishery on the proposed trip limit modification. Both the Kodiak trawl pollock vessels and Kodiak seafood processors are concerned that changing the trip limit for the PWS pollock fishery would negatively affect their operations. They believe that reducing the trip limit from the current 300,000 pounds to the proposed limit of 200,000 pounds will affect their ability to participate in the fishery and negatively affect the community of Kodiak as a whole. Reducing the trip limit will reduce the value of each pollock trip making it likely that vessels will discontinue pollock deliveries into Kodiak.

Kodiak is dependent on the PWS pollock fishery. The majority of pollock harvests from PWS are delivered into the port of Kodiak. Based on the *PWS Registration Area E Groundfish Fisheries management report, 2009-2013*, recent ex-vessel value of the fishery is approximately one million dollars, a wholesale value of approximately 2.4 million dollars. Our community has invested heavily in infrastructure to support these landings – water, electricity, harbors, docks and transportation infrastructure. Landings across our docks provide jobs and wages to our resident processor labor force and tax revenue to support our local municipalities. Our community has benefited from the PWS pollock fishery since its inception in 1995 and has demonstrated long term historical dependency on the fishery.

As outlined in the management plan, ADF&G has many tools available to manage the pace of the fishery and keep catch and bycatch within levels allowed in the fishery. These tools include mandatory check-in and check-out procedures, in season catch reporting, the present trip limit of 300,000 lbs. and, finally, the department's authority to open and close the fishery for short fishing periods as needed. The Department has demonstrated their ability to manage the fishery effectively during the recent time clip



from 2010 to 2013 with actual catches ranging from 94% to 102% of Pollock GHL with bycatch amounts below the allowable bycatch caps. They have also successfully closed the fishery when either bycatch or Pollock catches have reached their limits. Given this effective management authority, the most significant effect of any trip limit change would simply be a redistribution of landings away from Kodiak.

Our community is concerned that changing the PWS pollock trip limit will reallocate access to the fishery and negatively affect the overall community of Kodiak. The City of Kodiak encourages the Board of Fish to reject the proposed reduced pollock trip limit. We appreciate your consideration of our recommendation and also want to thank you for your service to both the State of Alaska and the sustainability of Alaska's abundant fishery resources.

Sincerely,

A handwritten signature in cursive script that reads "Pat Branson".

Pat Branson
Mayor, City of Kodiak



November 11, 2014

Honorable Chairman and Board of Fisheries Members,

I am writing to you on behalf of the Seward Charter boat Association about two proposals #8 and #23, which pertain to Lingcod. The Seward Charter boat Association represents 22 charter businesses operating from Seward and fishing primarily in the waters of Prince William Sound. The organization was founded in 1996 and you have not heard much from our organization because we are not in the business of creating conflicts over fisheries. Seward is a small town and both Charter and Commercial fishers try our best to get along.

The Proposal #8 before you, is regarding lowering the limit on sport caught lingcod to one per person per day. It is our observation on the grounds, that the population of lingcod is declined to a point where most of the charter vessels have been only keeping one ling cod per person anyway, but this not binding and is only being done because of our concerns about the populations on the grounds and that a once easy fish to catch has become scarce. The confusing issue is even in areas where there is no fishing pressure, lingcod populations appear to be dwindling. We are not seeing sub legal lingcod in numbers where one would think that there are good year classes entering the population. Overall our feeling is that is would be best to take a few years of a lower limit to insure viability of the population in the baseness of a current stock assessment. Furthermore it is highly likely that the bag limit on halibut drops again this year as the charter sector is 20% over their new allocation under the Catch Share Plan for 2014. This will only serve to increase pressure on the lingcod and with a two fish limit if there is not a conservation concern now, there will be after our fleet kills two each day to make up for the lower halibut limit. For all these reasons we would ask that you pass the proposal. The second proposal involves resetting the commercial GHL in the inside waters of PWS to be more consistent with the current harvest levels, which are far below the GHL, probably because there are not enough lingcod to reach the GHL or enough interest in catching them. In the outside waters our understanding is, that even in years when the GHL is



reached, the retention of Lingcod beyond the GHL is allowed as by catch. This is not fair, if the GHL was derived on any science, which looked at stock populations and sustainable harvest levels. It is our understanding that this is not the case either and that the GHL was based on an average harvest level. If this is the case, it is not the proper way to manage a sustainable fishery and perhaps that is why the lingcod levels do not seem to be sustainable. The last thing our organization wants to do is take money or food from the commercial fishing industry in Prince William Sound. In Seward our friends and their families depend on a healthy fishery in Prince William Sound as does the charter fleet. However we are proposing that we take a 50% reduction and in turn we are asking for our friends in the commercial fishery to simply keep catching what they have been recently and to stop retaining lingcod after the GHL is reached. It is our opinion that neither of these requests will have significant financial impact on anyone. This seems more than fair and we hope that the commercial sector can agree to maintain the status quo at the current harvest levels and not to exceed their allocation in the outside waters. We would be at this meeting to present these proposals but both President Steve Zernia and I both have a prior commitment at the North Pacific Fishery Management Council. We both serve on the Charter Halibut Implementation Committee, where we are tasked to recommend which measures to constrain our halibut harvest since we were over by nearly 20%. At the same time that the Board of Fisheries is meeting in Cordova. I hope you can give due consideration to our proposals, despite our absence and if and when we find that stocks show signs of recovery that we can get back to a two fish limit again in the future.

If you have any questions or concerns please don't hesitate to contact me directly.

Respectfully

Andy Mezirow
Policy Advisor, Seward Charter boat Association
Owner, Crackerjack Sportfishing
Halibut IFQ shareholder and longline fishermen
(907) 362-1600



Submitted By
Caleb Preston
Submitted On
11/6/2014 10:38:17 AM
Affiliation

Mr. President and Board Members,

I oppose Proposal 10 to change the set gillnet component of Prince William Sound (PWS) Management and Salmon Enhancement Allocation Plan.

My grandparents bought our setnet permit in 1979 and our family has been actively involved in the fishery since then. For our family, it's become not only a livelihood but a way of life.

The author of Proposal 10 presumes that the allocation percentage was established in error.

While I was not involved personally in the original determination of allocation triggers, my family and I have fished for 30+ years and from a practical standpoint, feel that no portion of the allocation plan needs revision. Other fisherman that I know were personally involved the allocation process, and had access to the data used in determining the triggers, felt that no error was made either. Here's a comment from a fisherman that was present at the allocation meetings...

The author of Proposal 10 presumes that an error has been made in setting the setnet allocation at 4% and a remedial trigger at 5%. In his response to the question stated for all proposals, "What is the issue you would like the board to address and why?".....He states, "Correct an error in the regulation." As an attendee at the 2005-2006 BOF meetings I can assure you that an error was not made, and there is no current evidence that any portion of the allocation plan is in need of revision. His supposition of error is invalid.

(For the following comment please refer to: Alaska Board of Fisheries Findings on Prince William Sound Management and Salmon Enhancement Allocation Plan #2006-248-FB. Available online at ADFG BOF webpage under Findings/Policies section.) All members of the BOF Committee B and public panel, including myself, that met on the evening of Dec. 2 2005 (See Pg 3 of #2006-248-FB) to discuss respective gear group allocations and remedial triggers were of one mind that each gear group would have the ability to attain its full respective allocation percentage without triggering remedial action. It was also agreed that the setnet gear group would trigger remedial action by exceeding its 4% allocation percentage by one full percentage point. This was deliberate and agreed to by all parties present.

There were no discussions of attempting to trigger a remedial action by fractions of less than one percentage point. e.g. There would not be a remedial action triggered by the setnet gear group attaining say 4.25%. This was judged at the time to be a fair and reasonable action and nothing has occurred in the interim to suggest otherwise.

The current allocation plan is fulfilling it's original purpose. When the setnet group went over it's allocation one year, we got cut back, then resumed normal fishing once back under the trigger.

The original committee involved in determining the allocation had access to the historical data and collectively analyzed the facts to establish the triggers. It was a result of the proven BOF process based on hard data.

What data is the author of Proposal 10 using to claim that the trigger was established in error? In my view, he does not have access the same facts and context that was used to establish the original triggers which have worked so well for all gear types.

The plan is working as is and I personally feel there was not any original error. I trust the data and decision of the BOF that created it. Thus, I oppose the Proposal and recommend we continue with the existing allocation plan that has works for all involved.



Submitted By
Christopher S Thomas
Submitted On
10/19/2014 7:45:31 AM
Affiliation
PWS SETNET

Phone
907 632-7319
Email
thomas_scott@asdk12.org
Address
1852 East 24th Ave
Anchorage, Alaska 99508

This letter responds to the Board of Fisheries request for comments on Proposed Changes in Regulations for the Department of Fish and Game. This letter provides comments from the Prince William Sound Setnetter's Association on Proposal 10 to change the allocation plan. We oppose Proposal 10, and urge the Board of Fisheries to reject this proposal.

The Prince William Sound Setnetter's Association opposes Proposal 10.

The Prince William Sound Setnetter's Association represents a group of set gillnet commercial fishermen in the Eshamy District. All members of the association oppose Proposal 10.

Proposal 10 recommends eliminating the 1% threshold for triggering penalty measures on the set gillnet gear group, while maintaining a 5% threshold for triggering penalty measures for both the drift gillnet gear group and seine gear group. Proposal 10 suggests an unfair regulatory proposal that would eliminate any margin of error prior to triggering penalties for the set gillnet gear group, while maintaining a substantially larger penalty trigger point buffer for the other gear groups. This proposal is inequitable by proposing to penalize the gear group with the smallest allocation to begin with. A 0% threshold for the set gillnet gear group would be unfair, while the other groups enjoy a 5% margin.

At the last Board of Fisheries Meeting in Valdez, we heard resounding support from most fishermen for no changes to allocation plan. We urge the Board of Fisheries to reject this proposal, and retain the current allocation plan because it is working.

Thank you for the opportunity to comment.

Sincerely,
C. Scott Thomas

Scott Thomas
PWS Setnetter's Association President
1852 E. 24th Ave., Anchorage AK 99508
(907) 279-0179



United Cook Inlet Drift Association

43961 K-Beach Road, Suite E ● Soldotna, Alaska 99669 ● (907) 260-9436 ● fax (907) 260-9438
● info@ucida.org ●

UCIDA Comments for the 2014 Prince William Sound BOF Meeting

Proposals:

- | | |
|--|---------|
| 4. Special Provisions – King Salmon | Support |
| 5. Main Bay – Sport fishing | Support |
| 6. Special Provisions – Prince William Sound | Support |

Subsistence/ Personal Use:

- | | |
|--|---------|
| 36. Prohibit mono & multi filament web –
use web like landing nets
so fish can be released | Support |
|--|---------|

Copper River Drainage:

- | | |
|--|---|
| 49. Open early King fishing Klutina River | Neutral – no catch & release provisions |
| 50. Catch and Release Salmon | Support |
| 51. Continued C & R with barbless hooks | Oppose – C & R Mortality |
| 52. Use of bait when C & R rules in effect | Oppose |
| 53. Clarifying single lure and fly | Support |



**PERSONAL COMMENTS ON PROPOSALS TO THE
ALASKA BOARD OF FISHERIES**

PRINCE WILLIAM SOUND & UPPER COPPER/SUSITNA FINFISH

From Don Quarberg, HC 60 Box 3070, Delta Junction, Alaska 99737
907-895-4650, dmqlaf@yahoo.com

<u>PROPOSAL #</u>	<u>RECOMMENDATION</u>	<u>COMMENTS</u>
4	Oppose or amend	This would only be a consideration if/when angler is using bait.
6	Support	Catch and release using bait greatly increases hooking mortality.
33	Support	Increasing spawning numbers will increase the population.
34	Support	This provides the Department with more management options.
35	Support ?	If this would increase survival of released kings, support it.
36	Support	This should improve the survival of fish to be released.
50	Oppose	The issue of permanent scars is irrelevant – they spawn and die in a short period of time anyway. Catch and release anglers contribute significant financial resources to the management of King Salmon. Eliminate bait if hooking mortality is really a concern.
54	Oppose	Grayling are such voracious feeders that bait is unnecessary. Doubling the daily bag limit would quickly lead to over harvest. This is why the bag limit was reduced in the 80's.





CDFU COMMENTS

November 20, 2014

ATTN: BOF COMMENTS

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

RE: 2014 PWS & UPPER COPPER/UPPER SUSITNA RIVERS FINFISH MEETING

Dear Chairman Johnstone and Members of the Board;

Cordova District Fishermen United (CDFU) is a non-profit membership organization representing over 300 family fishermen who participate in the commercial fisheries in the Prince William Sound and Copper River region. It is our mission is to preserve, promote and perpetuate the commercial fishing industry in Area E in the state of Alaska; to further promote safety at sea, legislation, conservation, management and the general welfare for the mutual benefit of all our members.

It is important to note that CDFU as an organization does not take positions on commercial gear-group allocations. CDFU's divisional structure features 4 separate divisions: Gillnet, Seine, Groundfish and Herring. This structure enables the organization to address issues relevant to all commercial fishermen while also allowing each division the flexibility to directly deal with gear-specific issues without compromising the core functions of the organization.

Thank you for the opportunity to comment on Proposals as part of the 2014 PWS & Upper Copper/Upper Susitna Rivers Finfish meeting in Cordova, Alaska. Attached, you will find written comments prepared by Cordova District Fishermen United on behalf of the Board of Directors and members of the commercial fishing fleet in Prince William Sound and Copper River.

We trust that the points we raise in these comments provide you with sufficient information to aid your final determinations during this regulatory cycle. If you require further clarification on any of the points we raise, we welcome questions either during the public testimony portion of the meeting or at any other time preceding deliberations.

Sincerely

Alexis Cooper, Executive Director
Cordova District Fishermen United
Director@cdfu.org



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
PWS	Sport (6)		
5	Close a portion of Main Bay to sport fishing. <i>PWSAC</i>	SUPPORT	We support PWSAC's request to avoid future destruction to property and brood stock. We also support sport access to these fish and recommend a line of buoys or corkline to delineate and help sport users know where to stop casting.
6	Prohibit the use of bait for salmon once the bag limit has been achieved on drainages crossed by the Copper River. <i>CR/PWS Advisory Com.</i>	SUPPORT	Although there is currently no conservation concern identified, sport fishing pressure along these drainages continue to increase every year and we support the Advisory Committee in their effort to reduce mortalities in the catch and release fishery.
	Commercial Salmon (13)		
18	Change drift gillnet gear specifications in the Copper River District. <i>FBX F&G Advisory Com</i>	OPPOSE	The goal of this proposal is to create an inefficiency in king harvest inside the barrier islands. This is unnecessary, as ADFG has the ability to reduce king harvest with time and area restrictions. This proposal will not direct its intended purpose.
19	Allow use of spotter planes in PWS salmon purse seine fisheries. <i>Scott McKenzie</i>	OPPOSE	
20	Allow use of spotter planes in PWS salmon purse seine fisheries. <i>Kris Phillips</i>	OPPOSE	The proposal is vague and the author's intent is unclear.
21	Allow use of spotter planes in PWS salmon purse seine fisheries. <i>Bruce Stamper</i>	N/A	We encourage author to request Dept. of Law to clarify position on intent of regulation.
22	Identify certain landmarks in description of the WNH THA using latitude and longitude coordinates. <i>Fred Marinkovich</i>	SUPPORT	We support the update of latitude and longitude in effort to offer clear and precise fishing lines for users.



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
	Commercial Groundfish(10)		
27	Establish directed commercial purse seine and jig Pollock fisheries in PWS. NASA	SUPPORT	If adopted, this proposal could create expanded regional economic fishing opportunity in years of low salmon abundance for fishing vessels 58 feet and under in length. PWS Pollock management should also be consistent with other state management plans being considered.
	Escapement Goal (1)		
33	Establish a BEG of 28,000 king salmon for the Copper River drainage. <i>FBX Advisory Com.</i>	OPPOSE	We support the department's process to establish the Copper River's Sustainable Escapement Goal, published in the "Escapement Goal Review of Copper & Bering Rivers, and PWS P. Salmon Stocks, 2014"
	Subs. & PU Salmon (10)		
37	Require a department operated check station to monitor subsistence and personal use harvest and permit compliance in the Chitina and Glennallen subdistricts. <i>Ahtna Tene Nene' C&T Com.</i>	SUPPORT	<p>We support timely and accurate reporting for best management of the resource. We believe this information can assist managers with making in-season decisions, provide a higher quality of reporting and ensure regulations are followed.</p> <p>Reinstatement of the check station will also provide an outreach opportunity for education on resource use and stewardship, which was lost following the termination of the program.</p> <p>If a check station is out of the department's budget and capabilities, perhaps a 48-hour reporting deadline from date of harvest for subsistence and personal use users could assist managers in season. This could be conducted via phone or email along with best practices information.</p>
38	Change the opening date for the Chitina Subdistrict personal use salmon fishery to open as early as June 1, but not later than June 11. <i>Chitina Dipnetter Assoc. &</i>	OPPOSE	CDFU generally supports Management Plan flexibility to allow ADF&G to react and manage in-season, through E/O authority over time and area. CDFU generally opposes management plan elements codified in regulation that reduce the ADF&G's ability to react and manage in-season.



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
38 cont	<i>FBX Advisory Com.</i>		<p>Regulations restricting ADF&G's flexibility may be detrimental to all user groups.</p> <p>However, the CRPU Dip Net Salmon Fishery Management Plan was amended in this manner at the 2011 CRPWS BOF meeting as part of a compromise including an amendment to CR King Salmon Management Plan adding a third mandatory inside closure. Therefore, CDFU opposes this proposal.</p> <p>(See RC 61. 2011 CR/PWS BOF meeting in Valdez)</p>
39	Change the Chitina Subdistrict personal use annual limit to be based on household size. <i>Chitina Dipnetter Assoc. & FBX Advisory Com.</i>	OPPOSE	<p>PU Fisheries were not intended to fully meet a family's salmon needs for the year although they usually do. The Copper River is a fully allocated fishery. Increasing bag limits for one user group will only negatively impact the balance between all users.</p> <p>Additionally, there are many Alaskans whose access to the resource depends on commercial fisheries via gifting, grocery stores and local farm markets.</p>
40	Require charter operators that transport personal use fishermen keep a daily logbook. <i>Shawn Gilman</i>	SUPPORT	CDFU supports timely and accurate reporting from all users. Commercial operators have always been held to rigorous reporting requirements.
41	Repeal the reduction of the Chitina Subdistrict personal use allocation if the commercial salmon fishery is closed for 13 or more consecutive days. <i>Chitina Dipnetter Assoc. & FBX Advisory Com.</i>	OPPOSE	This regulation was written for all to share in conservation when necessary. Recently, conservation hasn't been an issue. Run stability requires everyone to take part in natural ebbs and flows of production
43	Establish an allocation of 3,000 king salmon to the	OPPOSE	King salmon have been and still are a fully allocated and fully utilized resource amongst all



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
43 cont	Chitina subdistrict personal use fishery. <i>Chitina Dipnetter Assoc. & FBX Advisory Com.</i>		users on the Copper River. Additionally, it isn't feasible to manage a limit of 3,000 king salmon in a PU fishery of 10,000 users without in-season harvest information. Currently, EO authority can be used to expand opportunity with increased king abundance.
Commercial Salmon (5)			
44	Prohibit commercial salmon fishing until a salmon is recorded at the Copper River Sonar. <i>FBX Advisory Com.</i>	OPPOSE	<p>Information from commercial catch is the first and best index of run strength. Escapement and harvest information from past years exhibit the stability of returns for all users resulting from ADF&G's management.</p> <p>Recent returns have proven false the proposals at prior board cycles regarding "overharvest" of the early run.</p> <p>Claiming conservation, while actually attempting to reallocate belittles the process.</p>
45	Repeal mandatory inside waters closures in the Copper River King Salmon Management Plan. <i>Shawn Gilman</i>	SUPPORT	Mandatory inside closures are unnecessary as ADFG has the ability and confidence to use EO authority as needed. ADF&G opposes mandatory language regarding sport fisheries because it limits their ability to react to natural variations in run strength and timing. The same holds true for commercial fisheries.
46	Restrict retention of commercially caught king salmon for a person's own use not to exceed the king salmon sport bag limit in area caught. <i>FBX Advisory Com.</i>	OPPOSE	<p>Cordova's subsistence needs incorporate home pack retention of commercially caught fish. This is reflected by Cordova's unique two level ANS finding.</p> <p>The proposal does not affect conservation or allocation, as the fish retained for home pack would be sold commercially if home pack were limited.</p>
47	Allow use of dip nets for	OPPOSE	ADFG has the ability and confidence to utilize EO



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
47 cont	commercial salmon fishing during emergency order closures of the commercial drift gillnet fishery. <i>FBX F&G Advisory Com.</i>		<p>authority as needed in order to restrict the commercial harvest of CR Chinook salmon.</p> <p>Dipnets are not a feasible harvest method for the CR commercial fishery. Removal of historic harvest method & opportunity when there are no listed stocks of concern is unwarranted. Proposal author shows a lack of knowledge of the fishery and area involved.</p>
	Sport (9)		
49	Change the sport fishing season opening date for king salmon on the Klutina River from July 1 to June 1. <i>Jim West`</i>	OPPOSE	King salmon have been and still are a fully allocated and fully utilized resource amongst all users on the Copper River. Opening up a fishery for another month on king salmon spawning grounds is not prudent.



CDFU SEINE DIVISION 2014 BOF POSITIONS

November 20, 2014

ATTN: BOF COMMENTS

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

RE: Commercial Salmon - See positions in chart below.

Dear Chairman Johnstone and Members of the Board;

Cordova District Fishermen United, Seine Division represents those seine permit holders who are members of the Division. CDFU's divisional structure enables each gear group to deal with gear-specific allocative issues without compromising the function of the entire organization. The following comments being submitted are specific to enhanced salmon allocation proposals.

	Proposal	Position	Comments
#	Commercial Salmon (13)		
11	Change PWS Management and Salmon Enhancement Allocation Plan to include VFDA in calculation.	O	If adopted, this proposal would drastically unbalance the current allocation plan. The latest COAR report shows that the current allocation plan is working.
12	Change PWS Management and Salmon Enhancement Allocation Plan to exclude Gulkana Hatchery production in calculation.	O	Again, the current allocation plan is working. We think the Gulkana enhanced salmon are marked, counted and valued fairly.
13	Open certain waters of College Fjord to purse seine fishery before July 21.	NA	



CDFU SEINE DIVISION 2014 BOF POSITIONS

	Proposal	Position	Comments
14	Reestablish historic purse seine gear access to Coghill Lake sockeye salmon in Coghill River terminal area. NASA	NA	
15	Establish standards to alleviate gear conflicts in Esther subdistrict during the commercial pink salmon fishery.	NA	
16	Establish alternating purse seine and drift gillnets fishing periods in certain areas to alleviate gear conflicts in Esther Subdistrict during the commercial pink salmon fishery.	O	The issue, if it exists, is better addressed under language contained in proposal 15. It is our collective belief that gear conflicts are limited and can be effectively worked out by the fishermen themselves. Additionally, this proposal carries unintended consequences that could result in a potential loss of fishing area for both the drift and seine fleet.

Thank you for the opportunity to provide comment.

Sincerely,

Rich Collins, Seine Division Chair
 Cordova District Fishermen United

Bernie Culbertson, Seine Division Chair
 Cordova District Fishermen United



CDFU GILLNET DIVISION 2014 PWS/CR BOF POSITIONS

November 20, 2014

ATTN: BOF COMMENTS

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

*RE: PWS Enhanced Salmon Allocation Plan Proposals 10-16 - **No Action.***

Dear Chairman Johnstone and Members of the Board;

Cordova District Fishermen United, Gillnet Division membership represents over half of the 536 drift gillnet permit holders operating in the waters of Prince William Sound and the Copper River. Because of CDFU's divisional structure, each gear group is able to deal with gear-specific allocative issues without compromising the function of the entire organization.

The following Division comments further explain the No Action position regarding the Enhanced Salmon Allocation Plan proposals.

It is the position of the Gillnet Division that fair and equitable historic percentages as well as equal percentage triggers are important to an enhanced salmon allocation policy's success. A fair and equitable allocation plan of enhanced fish stocks and the methods of reporting are cornerstones to the future success of said plan.

Rather than attempt to edit or fix the Enhanced Salmon Allocation Plan at a four-day meeting, we would encourage the Board to assign a stakeholders' meeting to review and propose any changes that may be necessary.

Additionally, the Gillnet Division would like to comment on the recent change to the proposal forms for this cycle. We feel that the intent to streamline the process has changed the reasoned thought that should go into each and every proposal. While acknowledging the board does answer these deleted questions when deliberating, we feel the public at large has lost some of the necessary culture for approaching resource management.

Thank you for consideration and we welcome questions at any time during the meeting should you require further clarification on this position.

Sincerely,

Shawn Gilman, Gillnet Division Chair
Cordova District Fishermen United

Rich Wheeler, Gillnet Division Chair
Cordova District Fisherman United



CDFU GROUND FISH DIVISION 2014 PWS/CR BOF POSITIONS

November 20, 2014

ATTN: BOF COMMENTS

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

RE: 2014 PWS & UPPER COPPER/UPPER SUSITNA RIVERS FINFISH MEETING

#	Proposal	Position	Comments
	Commercial Groundfish(10)		
23	Close PWS management area to commercial lingcod harvest when inside and outside district guideline harvest levels are achieved, including lingcod caught as bycatch. <i>Seward Charter Boats Assoc.</i>	OPPOSE	Charter operators would like to catch more lingcod by reducing what the commercial catches. There is no documentation to support action on this proposal.
24	Clarify that lingcod may only be retained from July 1 through December 31. <i>ADFG</i>	SUPPORT	Housekeeping Issue: ADFG as stated in the proposal says that the change will make it easier to understand the regulation and aid with enforcement.
25	Change PWS Inside District sablefish season opening and closing date for pot gear. <i>Rod Jensen</i>	SUPPORT	Make the opening and closing dates concurrent for both fisheries, not just the one. It is a permit only fishery with a quota that will not affect the GHL.
28	Change the amount of rockfish that may be retained as bycatch during P. cod and walleye Pollock fisheries. <i>ADFG</i>	SUPPORT	The regulation needs to be clearly defined within the user groups regulations to be consistent, which in turn will make all individuals and enforcement adhere to the same rules.
29	Require retention of all rockfish in the sablefish fishery on gear sets below 150 fathoms, remove rockfish bycatch limits and requirements, such that proceeds from rockfish bycatch are not surrendered	OPPOSE	Rockfish allocations are already being reached early each year. Save the resource, do not remove or decimate the species for the benefit of another species.



CDFU GROUND FISH DIVISION 2014 PWS/CR BOF POSITIONS

#	Proposal	Position	Comments
30	to the state. Jon Van Hying Eliminate closure of P. cod pot season at 90% of guideline harvest level and combine pot and jig allocations, provide a step up/step down allocation depending on achievement of guideline harvest level. Rod Jensen	Neutral	Still confused about what is being proposed. However, it is our opinion there should be a trigger point established that would work to the benefit of both user groups and still adhere to the allocations set forth by the management plan.
31	Change P.cod allocation to provide 10% for jig gear until June 10, after which it will then be available to pot gear, and designate the state-waters jig fishery as non-exclusive. Greg Gabriel	SUPPORT	This would allow individuals an opportunity to get into an affordable and open fishery. Currently, for this user group there is no incentive to do so. 10% of the GHF is not that much during this time of the year and if the quota isn't harvested it is rolled over into opportunity for other user groups in the latter part of the year.
32	Correct coordinates within the described closed waters section for groundfish at Zaikof Point. ADFG	SUPPORT	Housekeeping Issue: Clear and precise coordinates make it easier for users and enforcement.

Thank you for the opportunity to comment,

Mike Simpson, Groundfish Division Chair
Cordova District Fishermen United

Robert Beedle, Groundfish Division Chair
Cordova District Fishermen United



Submitted By
Forest Jenkins
Submitted On
11/5/2014 7:02:09 AM
Affiliation
Prince William Sound Setnetter's Association

Phone
6083858962
Email
jenkfo01@gmail.com
Address
W25126 Sullivan Road
Trempealeau, Wisconsin 54661

My name is Forest Jenkins and I am a member of the Prince William Sound Setnetter's Association, which represents a group of set gillnet commercial fishermen in the Eshamy District. All members of the association, including myself, oppose Proposal 10.

Proposal 10 recommends eliminating the 1% threshold for triggering penalty measures on the set gillnet gear group, while maintaining a 5% threshold for triggering penalty measures for both the drift gillnet gear group and seine gear group. Proposal 10 suggests an unfair regulatory proposal that would eliminate any margin of error prior to triggering penalties for the set gillnet gear group, while maintaining a substantially larger penalty trigger point buffer for the other gear groups. This proposal is inequitable by proposing to penalize the gear group with the smallest allocation to begin with. A 0% threshold for the set gillnet gear group would be unfair, while the other groups enjoy a 5% margin.

At the last Board of Fisheries Meeting in Valdez, we heard resounding support from most fishermen for no changes to allocation plan. We urge the Board of Fisheries to reject this proposal, and retain the current allocation plan because it is working.

Thank you for the opportunity to comment.

Sincerely,

Forest Jenkins



Submitted By
Jack Willard
Submitted On
11/6/2014 10:29:06 AM
Affiliation

~~I support the Chitina personal use fishery and proposals 38, 39, 41, 43 and 18" .

I oppose proposal 35,36,42 and 45



Submitted By
Jake Sprankle
Submitted On
11/19/2014 5:06:34 PM
Affiliation

Phone
907-590-3462
Email
jakesprankle@gmail.com
Address
2665 Montevrde RD
Fairbanks, Alaska 99709

Prop. 1 Oppose

PROPOSAL 1 - 5 AAC 01.610. Fishing seasons. Establish a weekly 36-hour subsistence fishing period until the two days after the closure of the commercial salmon season:

There is no lack of reasonable subsistence opportunity, especially for the commercial fishermen who sponsor this change. Current "homepack" regulations also allow these commercial fishermen plenty of opportunity to fill their freezer, especially when they are using 50' gillnets to do so.

Prop. 18 Support

PROPOSAL 18 - 5 AAC 24.331. Gillnet specifications and operations. Change drift gillnet gear specifications in the Copper River District,

The practice of "rolling up kings" by drift gill netters, in the Copper River District allows fishermen to entangle kings in loosely hung gill nets and undermines earlier regulations that were meant to reduce the king salmon harvest. King salmon are an easy target as they mill in the mouth of the Copper River inside of the barrier island and this practice needs to stop—especially with the loss of king salmon numbers over the last 6 years.

Prop. 33 Support

PROPOSAL 33 - 5 AAC 24.361. Copper River King Salmon Management Plan. Establish a biological escapement goal of 28,000 king salmon for the Copper River drainage.

An OEG of 28,000 king salmon would help king salmon stocks in the Copper River rebound from the past 6 years of low returns.

Prop. 35 Oppose

PROPOSAL 35 - 5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Prohibit the use of monofilament mesh in dip net bag webbing in subsistence and personal use fisheries.

The only problems that occur with monofilament mesh in dip nets occur with smaller salmon that get gilled by the net--- similar to the gillnetting done by commercial fisherman. Larger sockeye and king salmon do not get gilled and thus are removed fairly easily from these nets. There is no evidence that mono-filament over other types of mesh increases released king salmon mortality. If we are going to prohibit the use of monofilament mesh in dip nets, then we should also prohibit their use in all commercial gillnets. The author of this proposal has obviously not dipnetted because one can easily release a king or large sockeye with these nets without harm to the fish--- much less harm than being rolled in a commercial gillnet, or caught on rod and reel and then released.

Prop. 36 Oppose

PROPOSAL 36 - 5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. In subsistence and personal use fisheries, prohibit removing a king salmon from the water if it is to be released

Again, this proposal illustrates that the author has no idea of the practice of dipnetting. This is a non-issue and is impractical.



Prop. 37 Oppose

PROPOSAL 37 - 5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans; and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Require a department operated check station to monitor subsistence and personal use harvest and permit compliance in the Chitina and Glennallen subdistricts.

Alaska State Trooper presence is already sufficient—been checked many times. The fishery is already managed using pre-season daily estimates coupled with actual daily sonar counts from the Miles Lake sonar. A check station would be costly, and provide no help in managing our fishery.

Prop. 38 Support

PROPOSAL 38 - 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Change the opening date for the Chitina Subdistrict personal use salmon fishery to open as early as June 1, but not later than June 11

Look at the numbers: From 2007- 2011 the average harvest in the CPUDF for the first week of June, was 2,572 salmon. As a comparison, in 2014 at the end of the first week in June the commercial drift gill net fleet in Cordova had already harvested 670,000 salmon. If you want to increase the numbers in the farthest upstream spawning grounds, restrict the commercial fisheries start as it is the determining factor as to how many salmon arrive in the upriver subsistence fisheries, **not** the small harvest taken in the personal use dipnet fishery. Radio telemetry and salmon tagging by ADF&G has determined that the majority of the earliest salmon arriving in the Copper River are those salmon which travel to spawning grounds farthest upstream. Please use the science from ADF&G—and then common sense.

Prop. 39 Strongly Support

PROPOSAL 39 - 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Change the Chitina Subdistrict personal use annual limit to be based on household size, as follows:

Change the Chitina Personal Use Dip Net Fishery (CPUDF) annual bag limit to match the Upper Cook Inlet Personal Use Dip Net Fishery annual bag limit (25 salmon for a permit holder and 10 salmon for each additional household member).

Again—please use the science from ADF&G and common sense. Just looking at 2012 numbers, Personal Use Dipnetters harvested 127,000 sockeye and only 567 chinooks. That's total harvest for 10,016 permit holders. Five hundred (500) or so commercial fishermen harvested 1,900,000 sockeyes and over 12,000 chinook salmon. That's over 90% of the sockeye harvest and 82% of the chinook harvest by 4% of the people targeting these fish. Allocating more fish for the largest number of users (Alaska residents by the way!) is a no-brainer. Also, in 2012, 1,527 subsistence fishermen harvested 76,305 sockeyes and 2,095 chinooks (4% of the sockeye harvest and 14% of the chinook harvest). Allocating more fish for subsistence users is a no-brainer as well. This proposal would also match the South Central dipnet fishery. Why there is a difference between the two also makes no sense. The current allocation structure of 30 salmon for a family of 2 or more and 15 for a single household does not take into consideration the size of the family. A family of 6 people is only allocated five salmon per member, while a family of one or two is allocated 15 salmon per member. That makes no sense. Please adopt this proposal **and** do away with the supplemental harvest periods.

Prop. 40 Oppose

PROPOSAL 40 - 5 AAC 77.XXX. New Section. Require charter operators that transport personal use fishermen keep a daily logbook

This proposal is not warranted. Harvest data is already supplied on each personal use dip net permit There is no reason to place this extra burden on the few Chitina dip net charter operators. If you are concerned with how many people use commercial operators, have a check box on the permit like hunting harvest reports do.

Prop. 41 Strongly Support

PROPOSAL 41 - 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Repeal reduction of the Chitina Subdistrict personal use allocation if the commercial salmon fishery is closed for 13 or more consecutive days

There is no valid justification for reducing the CPUDF salmon allocation for the rest of the season because the commercial fleet is not fishing. Again—please use the science from ADF&G and common sense. As stated above and just looking at 2012 numbers, Personal Use Dipnetters harvested 127,000 sockeye and only 567 chinooks. That's total harvest for 10,016 permit holders—only 6% of the total harvest by 83% of the users. Five hundred (500) or so commercial fishermen harvested 1,900,000 sockeyes and over 12,000 chinook salmon. That's over 90% of the sockeye harvest and 82% of the chinook harvest by 4% of the people targeting these fish. We should



Prop. 43 Strongly Support

PROPOSAL 43 - 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Establish an allocation of 3,000 king salmon to the Chitina Subdistrict personal use fishery

The Board of Fish has essentially taken over 100 pounds off my family's table by its mismanagement and unjust allocation of this species. Dipnetters used to be able to harvest five (5) chinook salmon per family per season. Then it got reduced to 4 and now it's pretty much none (0) as we are only allowed to retain 1 king in the first 1-3 weeks of dipnetting. Five sockeyes do not equal 5 chinooks by the way—in weight or in nutrition. Again—let's just look at the numbers: commercial fishermen harvested over 12,000 chinooks in 2012. Dipnetters harvest: 567. That's it. 567! It does not pass the straight face test/ the smell test—or any common sense test. It is bordering on being criminal it is so unjust and in violation of our Alaska State Constitution. I implore you, re-establish the allocation of king salmon to personal use dipnetters.

Prop. 44 Support

PROPOSAL 44 - 5 AAC 24.310. Fishing seasons. Prohibit commercial salmon fishing until a salmon is recorded at the Copper River sonar

I agree with Fairbanks Advisory Committee's rationale for supporting this proposal.

Prop. 45 Oppose

PROPOSAL 45 - 5 AAC 24.361. Copper River King Salmon Management Plan. Repeal mandatory inside-waters closure in Copper River King Salmon Management Plan

Our chinooks are in trouble—please keep the inside closure restrictions in place until we see a dramatic rebound in their numbers

Prop. 46 Support

PROPOSAL 46 - 5 AAC 24.3XX. New Section. Restrict retention of commercially caught king salmon for a person's own use to not exceed the king salmon sport bag limit in area caught.

I agree wholeheartedly with the Fairbanks Advisory Committee's rationale for this proposal. We should do away with the "home pack" loop hole altogether.



Submitted By
James Mykland
Submitted On
11/15/2014 12:12:54 PM
Affiliation

Alaska Department of Fish & Game
Board of Fisheries,
PWS Finfish Proposals

My name is James Mykland and I have commercially fished, out of Cordova, AK, since 1976. I currently hold both PWS drift gillnet & herring permits.

Proposals I support:

- #5: I support PWSAC's request to avoid damage to brood stock and the barrier seine.
- #6: The huge increase of the coho sport fishery, during the last ten years, in the Copper River Basin, needs more regulatory measures, to ensure adequate sustainability.
- #12: I tentatively support the author's proposal, due to the fact, that even though, after the 2005 BOF mtg., ADF&G did separate out sockeye value between PWS & CR, the department was not willing to go the extra step and separate the CR sockeye fishery value. The entire CR sockeye fishery value is incorporated (in the COAR) from the start of the CR fishery (usually May 15th) to the end (usually August 1st). The Gulkana hatchery enhanced sockeye run entry is June 15th-August 1st. The point here, is that the Gulkana enhanced sockeye value is averaged in over the entire CR sockeye fishery, with the result that the drift gillnet fleet's ex-vessel value is over inflated, on average, by \$250K-\$400K each season. The department has refused repeated requests to work on this issue. If the BOF does not exclude the Gulkana portion from the allocation plan, at least they could request that the department separate the early wild sockeye value component from the COAR.
- #17: The department limits the drift fleet by time and area. Mono gear is already in use in Cook Inlet, no issues with sustainability of the resource.
- #22: Using GPS coordinates are needed here.
- #34: This proposal gives the department more tools to manage the CR for sustainability.
- #37: I support timely and accurate reporting of all salmon harvested, from the Copper River, by all user groups.
- #40: Timely and accurate reporting of all salmon is imperative tool, which the department uses to make management decisions.
- #45: The department has shown, through their EO authority, that it has the tools to make management decisions, without mandatory regulations impeding their decision making.

Proposals I oppose:

- #1: There are already plenty of opportunities for subsistence fishing on the lower CR, mandatory subsistence fishing periods are not needed.
- #2: The department has always given ample opportunity for subsistence fishing on the lower CR. EO authority is the most efficient tool for CR sustainability.
- #3: This will be an enforcement nightmare, commercial fishers already have ample time and opportunity to participate in the subsistence fishery on the lower CR.
- #10: The PWS salmon set net gillnet fleet, has one area to fish in PWS, no change is currently needed in their allocation percentage.
- #13: Early run timing chums, returning to WNH, are harvested all the way up Port Wells (including College Fjord). The drift fleet has been able to harvest all surplus fish in this area. If the department has an issue with quality or over escapement, they then have the EO to use the purse seine fleet in this area, before July 21st of each year.
- #14: Same as #13, the western early run chum fishery, is fully allocated to the drift gillnet fleet, and is part of the PWS salmon allocation plan. This proposal is an end run around the allocation plan, that is currently working well for all user groups.
- #15: What gear conflict? Both user groups have been able to efficiently harvest surplus fish in the Esther sub district (within the Coghill district), after July 21st of each year.
- #16: Same as #15, there is no gear conflict.
- #18: Not needed, since using excess amounts of web, actually hinders a drift fisher's ability to catch sockeye, which makes up the majority of their harvest.
- #33: The department is already guided by the SEG, in all their management decisions. What would be more of a actual benefit is timely and accurate harvest reporting by all users along the CR.
- #38: This proposal would decrease the department's ability needed to manage the CR for sustainability.
- #39: The CR is a fully allocated fishery. PU fisheries were never intended to fully meet all Alaskan families salmon needs. That is what the subsistence fishery is for.
- #41: All user groups need to share in the conservation of the CR salmon runs.
- #43: The CR is already a fully allocated fishery, the PU fishery was never intended to supply families, with all their salmon needs.
- #46: Whatever salmon are caught, by the CR commercial fleet, are already part of the harvest, managed for sustainability by the department. This is a needless proposal, that for one, would create another enforcement nightmare.
- #47: Not needed, the department is doing a great job of managing the CR for sustainability.
- #48: GPS coordinates are working, the department does not have the dollars to install temporary district boundary markers. All other salmon areas in Alaska have gone to GPS readings.

#49: Already a fully allocated resource, this proposal is not warranted.

