

On-Time Public Comment List Southeast and Yakutat Finfish February 23–March 3, 2015

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LEGISLATIVE AFFAIRS AGENCY
LEGISLATIVE INFORMATION OFFICE
 Marie Murray, Legislative Information Officer
 201 Katlian Street, Suite 103, Sitka, AK 99835
 Phone: 747-6276 Fax: 747-5807
 Email: sitka_li@legis.state.ak.us

DATE: Feb 5, 2015

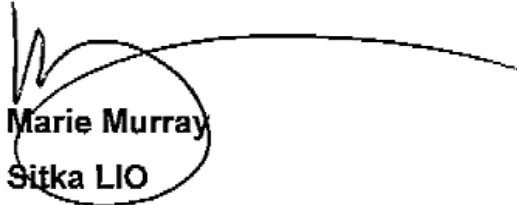
TO: Board Support Comments for Board of Fisheries meeting

FROM: John Murray
RE: Comments for Sitka Meeting,
 Southeast Alaska & Yakutat Finfish

5 pages incl cover
465-6094

Here are 4 pages of comments from John Murray.

Thank you,


 Marie Murray
 Sitka LIO

**Comments from John Murray 224 Observatory Street Sitka AK****Proposal 130 OPPOSE as written**

I do believe having a limited test fishery has merit .A region wide fishery would not be a wise move until many questions are answered. I believe a test fishery in a limited area could provide valuable information to other gear groups, ADFG, marketers and fisherman.

Proposal 140 OPPOSE

There is no biological reason for this proposal. It should be noted in some statistical areas the GHLL has not even been harvested in some seasons.

Proposal 141 SUPPORT

There is no conservation concerns currently in the Sitka Sound for ling cod. Allowing a small harvest for personnel use will increase the harvest very little.

Proposal 148 OPPOSE as written

While I generally support the concept of a community harvester this proposal needs work for the following reasons:

1) Stock assessment work needs to be done before and after a community harvest takes place. These are small island sockeye systems and without proper information they could easily be over harvested.

2) No number of fish is mentioned for harvest in proposal. I would suggest the BOF look at the Subsistence and Personal use REG book pages 62 and 63, 5AAC 01.760 Redoubt Bay and Lake Sockeye Management Plan as a template

Proposal 157 OPPOSE

1) The current size limit has been in place for over 35 years.

2) The SE Alaska King Salmon Management Plan is a real balancing act to provide the sport and charter fisherman/ guides with stability, harvest opportunity without going over the percentage of Kings allowed in the Plan .This Proposal would change the objectives in the Plan in a major way I believe.

Proposal 174 OPPOSE

Please look at 5 AAC 29.090 Management of the Spring Salmon Troll Fisheries (page91) for a well written regulation. The troll fleet and ADFG staff have worked out a good plan to harvest returning hatchery King Salmon with safe guards built in to protect wild stocks. A new management plan is not needed to



protect and conserve Taku River adult Kings .It should be pointed out this proposal is rife with misinformation.

Proposal 176 SUPPORT

This Proposal brings with it much history and baggage .It is really a hard one to sort out .I offer my bottom line:

- 1) The Allocation Plan is set up to protect all three gear groups when one is out of range for their respective value allocations .You can bet if the seine or gillnet fleet was out of their value allocation something would have been done.
- 2) While work is and has been done at NSRAA to help bring the trollers back into compliance .I have to ask .Is enough being done? Has enough been done? Trollers have fallen well short of their share for a long time.
- 3) We are talking about millions of dollars of loss to the troll fleet .Millions a year.
- 4) We are talking about the health and viability of the troll fleet .Strong fleets of all gear groups mean healthy communities. With the up and comer and the young folks coming into fishing industry.
- 5) This is complex issue there are no easy answers.
- 6) Trollers drag hooks though the ocean our catch efficiency is poor compared to net gear. That leaves time and area as a way to compensate.

Proposal 187 OPPOSE

SE gillnetters are above their enhancement value allocation (5AAC 33.364).There is also ironic twist in this proposal under "What is the issue....."a tool to facilitate corrections to enhanced allocation imbalances that may occur in the future." That is what trollers are dealing with in the present.

Proposal 188 SUPPORT

I'm not sure of the right access for trollers and seiners but some consensus should be had.

Proposal 220 OPPOSE

This proposal would open around 30 sq. miles of open water. The Yakutat trollers do well in the fall season usually in one of the top three districts of the SE Winter Troll fishery with a small amount of permits fishing the area. It might be worth looking at an increase in area in the Jan 1 to winter closure time period.

Proposal 223 SUPPORT

This proposal in a similar form has been in front of the Board of Fish before .Proposal 223 offers compromise language. That being only in higher abundance season 1.60 (abundance index) an above

2014



will the 60/40 be allowed. This breaks down to 12 seasons with AI of 1.59 and below and 8 seasons with AI of 1.60 and above in the last 20 seasons (1995 to 2014). We are talking about moving approximately 10,000 to 25000 King salmon per season to August opener on higher abundance season 1.60 and above. Please refer to my proposal especially the section under "What is the issue you....".

Abundance Index (AI) explained

Excerpts copied from the Executive Summary and Introduction sections in the 2013 Exploitation Rate Analysis and Model Calibration report, generated by the PSC as an annual report. The report is posted on the PSC website.

"The 2009 PST Agreement specifies that the AABM fisheries are to be managed through the use of the AIs. Each calibration provides the postseason AIs for the previous year and the preseason AIs for the current year. Preseason AIs are used to estimate the total allowable catch limits in the upcoming fishing season.

The Pacific Salmon Treaty (PST) requires the Chinook Technical Committee (CTC) to report annually on catches, harvest rate indices, estimates of incidental mortality (IM) and exploitation rates for all Chinook fisheries and stocks harvested within the Treaty area. To fulfill this obligation, the CTC uses a Chinook model to generate key outputs of relevance to the PSC's annual Chinook fishery management cycle. The PSC Chinook Model is calibrated each year, incorporating preseason stock-specific abundance forecasts with the latest information on catches, exploitation rates generated through cohort analysis, terminal runs and escapements. The Parties rely upon the PSC Chinook Model to generate annual estimates of abundance for aggregate abundance-based management (AABM) fisheries and indices for individual stock based management (ISBM) fisheries (Figure 1.1).

Abundance index (AI) prediction is at the heart of the PST Chinook salmon management process, because preseason AIs determine the preseason estimates of the total allowable catches for each of the three AABM fisheries. These preseason estimates of the total allowable catch drive the in season management of AABM fisheries, because no reliable mechanism exists to update the AIs in season. In addition to generating preseason AIs, the PSC Chinook Model provides other information of immediate relevance to PSC management, most notably postseason AIs and preseason ISBM indices. The first postseason AI estimates are used to determine the final total allowable catches to which the AABM fisheries are held accountable. The preseason ISBM indices are used to inform fishery management plans. Postseason ISBM indices are computed through a separate process using the CWT data that comes out of the exploitation rate analysis (ERA), to which ISBM fisheries are held accountable."

Proposal 224 OPPOSE

I oppose this because the trip limit option will likely become a slush fund or slush fish. I'd rather see the ADFG staff do their best to let trollers catch their summer King salmon quota via in-season management or opening and closures.

**Proposal 228 OPPOSE**

Most fisherman in the troll fleet have a high degree of confidence in our ADFG troll staffs ability to properly manage our fishery. ADFG staff have done a progressively good job on escapement, allocation issues, closures and openings which protect the salmon runs and allows for a well-managed fishery .This proposal would close all of SE waters from Dixon entrance to Cape Suckling for ten days whether there is a genuine need or not.

Proposal 230 OPPOSE

This proposal would in effect preclude trollers from fishing District 15C. The basic reason is trollers and gillnet gear do not mix well--for example, gear conflicts.

The expected armada of trollers moving into the waters of 15C or in other areas around Juneau hasn't happened and its unlikely the gillnet fleet will see the mass of trolling poles "a full blown high effort chum targeting troll fishery"...coming their way.

Lastly, having trollers continued access to 15C relates directly to the trollers' time and area needs to help balance the value allocations for enhanced salmon.



SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

February 5, 2015

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

Mr. Chairman:

Enclosed are the Seafood Producers Cooperative public comments on the Board of Fisheries proposals for Southeast Alaska and Yakutat finfish. We appreciate the opportunity to submit our public comments.

Seafood Producers Cooperative is owned by 550 vertically integrated commercial seafood harvesters. Since 1944, our member/owners have been fishing Alaskan waters from Dixon Entrance to the Bering Sea. We are the largest Fishermen's Cooperative in North America. Our member owned seafood processing facility located in Sitka, Alaska has been the center of our Alaskan Seafood Production continuously for almost four decades.

SPC supports and encourages the Alaska Board of Fisheries to adopt proposals:

#224: A good trip limit provision for the troll fishery to harvest small remainders of Chinook salmon.

S#225: (Icy Strait, Chatham Strait Chum Salmon Troll Fishery Management Plan, which had sunsetted). We seek to have the area remain available for future Chum troll harvest.

SPC strongly opposes the following proposals:

#193: Restricting the salmon seine fishery in Chatham Strait (or anywhere). Without a firm scientific basis, restrictions are without merit.

#200: There is no compelling scientific reasoning to close waters within 3000' of Admiralty Island to commercial fish harvest.

#220: We oppose Yakutat winter troll boundary line manipulations.

#221: We oppose manipulations of the winter troll boundary line, including expansion of the winter line from Yakutat Bay to Icy Bay.



#223: Leave the chinook troll harvest management as is, with the harvest goal for the July 1st opening at 70%.

#228: No mandatory 10 day fixed August Coho closure is warranted. Troll Coho closures are to rectify allocation or conservation concerns over Coho; and, also used for setting up a "fair start" for the summer Chinook fisheries. Nothing in current troll fishery management necessitates a statutory, pre-season, permanent 10 day Coho closure.

#230: Leave the waters of area 15C and time available to trollers as it currently exists. Only hatchery Chum salmon in volume will compel more than the occasional troller to concentrate effort during the summer in Lynn Canal. Relating to the proposal's absence of data, or basis in science; not infrequently, over 100 gillnetters fish lower Lynn Canal for days, targeting hatchery Chum salmon. Manipulation of the Lynn Canal gillnet fishery over adjacent troll effort borders on hysteria. Net gear is unaffected by troll gear and trollers must maneuver around and away from gillnet gear.

#231: Leave the Naha Bay troll area boundary as is. Sentiment and speculation alone fuels this proposal. If troll harvest of hatchery salmon has truly reduced local wild salmon escapement to a critical point, this should be supported by science from the Alaska Department of Fish and Game.

SPC has largely shared goals in matters that pertain to troll fishery management with ATA. Since the Alaska Trollers Association is the recognized voice of the salmon troll fleet, SPC's effort and emphasis on proposals is purposed to complement and reinforce the positions and endeavors undertaken before your board by the Alaska Trollers Association.

Thomas McLaughlin
President/CEO
Seafood Producers Cooperative



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration



PC 3
1 of 4

National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

February 5, 2015

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

Dear Members of the Board of Fisheries:

The National Marine Fisheries Service (NMFS) offers the following comments on proposed changes to regulations governing two commercial fisheries managed by the State of Alaska. NMFS requests that you take into consideration the information presented below when deciding whether to adopt the proposed changes:

Southeast Alaska Salmon Gillnet

Proposal 209 Allow drift gillnets with mesh size of four and seven-eighths inches or less to have a depth of up to 120 meshes.

Proposal 210 Allow the use of single filament mesh in a commercial salmon drift gillnet in the Southeastern Alaska Area.

Yakutat Salmon Set Gillnet

Proposal 214 Remove depth restrictions from commercial set gillnet gear

Proposal 215 Allow commercial salmon set gillnets up to 60 meshes deep after July 1.

NMFS is concerned that these proposals may result in additional incidental takes of marine mammals in these fisheries, which may in turn affect the health of certain marine mammal stocks. As required under the Marine Mammal Protection Act (MMPA), NMFS observes commercial fisheries with documented marine mammal incidental takes to further assess the level and nature of those takes. The most recent studies in the Yakutat salmon set gillnet fishery (2007-2008) and in the Southeast Alaska salmon drift gillnet fishery (Alaska Department of Fish and Game Management Districts 6, 8, and 7A, 2012-2013) have documented incidental takes of harbor porpoise, Dall's porpoise, sea otters, harbor seals, Steller sea lions, and humpback whales.

The standard sampling protocol for our Alaska Marine Mammal Observer Program (AMMOP) is to collect incidental take data in a portion of the focus fishery for two seasons. Subsequent data analysis includes the extrapolation of any documented marine mammal incidental takes to the fleet-wide fishing effort to produce an overall estimate of the average annual serious injury and mortality for each marine mammal species. NMFS has defined a serious injury as an injury that will more likely than not lead to mortality of the animal. Of the documented incidental takes in these fisheries, those of harbor porpoise currently present the greatest potential concern.





The 2014 NMFS Stock Assessment Reports (SARs) for harbor porpoise in Alaska identify three stocks: Bering Sea, Gulf of Alaska, and Southeast Alaska. In areas outside Alaska, studies of harbor porpoise distribution have shown that stock structure is more finely-scaled than is reflected in the Alaska SARs. Data are not currently available to define stock structure on a finer scale in Alaska. However, based on comparisons with other regions within the U.S. and worldwide, it is likely that several regional and sub-regional populations exist. NMFS is working toward developing a finer understanding of stock structure through improved sample collection and subsequent genetic analysis. The Southeast Alaska salmon drift gillnet and Yakutat salmon set gillnet fisheries both operate within the geographic boundaries of the Southeast Alaska harbor porpoise stock as it is currently defined.

The MMPA directs NMFS to calculate a potential biological removal (PBR) level for each marine mammal stock. This is the level of human-caused serious injury and mortalities that may safely be taken, while allowing that stock to recover to or be maintained at its optimal sustainable population level. NMFS compares each marine mammal stock's PBR to the level of serious injury and mortality to assess the impact to the stock across all commercial fisheries as well as for individual fisheries. Following NMFS policy, the PBRs for the three harbor porpoise stocks in Alaska are currently undetermined because the abundance estimates are more than eight years old (although a regional decline in local abundance has been documented recently by NMFS in the area around Districts 6, 8, and 7A). The last calculated PBR for the entire Southeast Alaska stock was 91 animals. A finer harbor porpoise stock structure in Southeast Alaska would result in smaller regional PBRs compared to the current Southeast Alaska stock. A smaller PBR based on recent abundance surveys in Southeast Alaska is currently in review for the area around Districts 6, 8, and 7A.

Analysis of 2007-2008 AMMOP data for the Yakutat salmon set gillnet fishery yields an estimated mean annual serious injury and mortality level of 22 harbor porpoise, with an additional 7 harbor porpoise estimated to be caught annually and released alive. Harbor porpoise incidental serious injuries and mortalities were documented in Districts 6, 8, and 7A of the Southeast Alaska salmon drift gillnet fishery in 2012-2013. Preliminary analysis of those data indicates an estimated mean annual serious injury and mortality of 12 animals in the observed portion of the fishery, with an additional estimated 32 animals released alive, but injured, annually. Because the observed Districts 6, 8, and 7A are just a portion of the entire fishery, NMFS considers these numbers to be underestimates when considering harbor porpoise take levels for the entire fishery. The harbor porpoise serious injuries and mortalities recently documented by AMMOP in these fisheries raise potential conservation concerns at the stock level, whether using the current or a future revised stock structure, due to three factors: the amount of estimated serious injury and mortality, the documented local harbor porpoise abundance decline in the area of the observed portion of the Southeast Alaska drift salmon gillnet fishery, and the consideration that there may be a finer stock structure for harbor porpoise in Southeast Alaska. This potential concern should be viewed in the context that NMFS does not yet have a good understanding of the harbor porpoise stock structure in Alaska, and thus we have some uncertainty about appropriate PBR levels as noted above.



The proposals under consideration by the Board of Fisheries to allow the Southeast Alaska salmon drift gillnet fishery to increase net depth from the current allowable 60 meshes up to 120 meshes for nets with a mesh size of four and seven-eighths inches or less (Proposal 209), to allow the use of single filament twine in this fishery (Proposal 210), to remove depth restrictions for the Yakutat salmon set gillnet fishery (Proposal 214), and to allow additional mesh up to 60 meshes after July 1 in this fishery (Proposal 215) may result in additional serious injury and mortality of harbor porpoise.

The use of monofilament twine in the Southeast Alaska salmon drift gillnet fishery (Proposal 210) may result in more harbor porpoise entanglements, thereby increasing the risk of higher levels of serious injury and mortality. Gillnets using monofilament twine in areas outside of Alaska have demonstrated high rates of harbor porpoise entanglement and serious injury and mortality. Two aspects of monofilament twine use are of concern. First, the monofilament twine may reduce the visibility of the net, either visually or acoustically, to harbor porpoise resulting in an increase in physical contact between a harbor porpoise and the net leading to potential increases in entanglement. Second, harbor porpoise are particularly vulnerable to entangling dorsal and pectoral fins as well as the caudal peduncle and flukes in gillnet mesh. Monofilament twine, in comparison to multi-strand twine currently in use in this fishery, is more flexible and appears to have a higher potential for entanglement due to the additional flexibility. Both of these factors may further increase harbor porpoise entanglements and levels of serious injury and mortality in this area where a local decline has been documented.

An increase in allowable mesh depth for a subset of the nets used in this fishery (Proposal 209) will result in an increase of total net area in the water column which harbor porpoise will need to avoid, thereby increasing the likelihood of encounters between harbor porpoise and gillnets. Doubling the mesh depth of some nets from 60 meshes to 120 meshes will result in an increase in net depth in the water column from approximately 24 feet to 48 feet. Nets observed during the 2012-2013 AMMOP study in the area were typically 32-36 feet in depth. Although this proposed change affects just a portion of the nets used in the fishery, since it is limited to nets in the lower mesh size range (four and seven-eighths inches or less) used primarily to target pink salmon in August, fishermen may also use this reconfiguration for entangling other salmon species throughout the fishing season. Although the overall number of fishermen who would adopt the proposed greater mesh depth is unknown, this proposed change will increase the potential for harbor porpoise entanglements and serious injury and mortality above levels documented by AMMOP observers in an area in which a local decline of harbor porpoise has been documented.

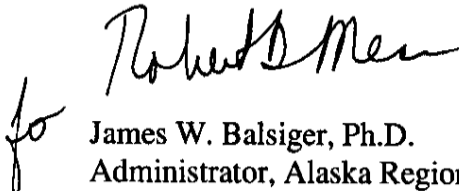
Proposals 214 and 215 in the Yakutat salmon set gillnet fishery would remove gillnet depth restrictions and would allow for an increase in allowable gillnet meshes, respectively. NMFS has documented harbor porpoise serious injuries and mortalities in this fishery as noted above, and the proposed changes for this fishery raise concerns for a potential increase in harbor porpoise entanglements, similar to those noted above for the Southeast Alaska drift gillnet



fishery. The total gillnet area in the water column would increase by some amount, depending on the number of fishermen who choose to opt for the greater net depth, which in turn would increase the potential for harbor porpoise encounters with gillnets, raising the possibility of serious injury and mortalities increasing above the levels recently documented in this fishery.

If you have questions about our comments, please contact Bridget Mansfield at 907-586-7642.

Sincerely,

A handwritten signature in black ink that reads "James W. Balsiger". To the left of the signature is a small, stylized handwritten mark that looks like "fo".

James W. Balsiger, Ph.D.
Administrator, Alaska Region



To The Alaska Board of Fisheries

My name is Robert Odmark. I live in Ketchikan, Alaska. I presently drift gillnet in S.E. Alaska.

I oppose proposal 209. I believe by increasing the depth of gillnets it would harm the gillnet fleet financially over the long term.

Robert Odmark

A handwritten signature in black ink, appearing to read "RO" followed by a long, sweeping flourish.

P.O. Box 7594

Ketchikan, Alaska 99901



Submitted By
Alan Dale
Submitted On
2/5/2015 7:10:22 PM
Affiliation

Phone
9076175085

Email
Alandaleenterprisesllc@gmail.com

Address
926 Nordstrom drive
Ketchikan, Alaska 99901

I am opposed to proposition 209 making the nets deeper will allow you to catch too much of the allocated sockeye. Same with 210 making the nets mono is also going to result in catching too much sockeye. Catching too much sockeye will limit the amount of fishing days in some districts which will cause crowding other districts causing me to lose money. No to proposition 209&210



Submitted By
Arthur Thurn
Submitted On
2/4/2015 6:22:31 PM
Affiliation
gillnetter for 35 years

Phone
907 738 1796
Email
sdthurn3@gmail.com

Address
2323 G Street
Bellingham, Washington 98225

I oppose proposal 209. The stocks in Lynn Canal can't take that kind of pressure. I just think we would wipe out all those little systems like Burners Bay, and all the other small runs that mill around Mab Island. There will also be a lot of drop-outs with the small mesh. The pink fishing really hasn't been very good lately even in Lutak.

I also oppose proposal 210. Mono fishes better but tears up quicker. When it is rough out you will have more drop-outs. You will also kill more birds which I think would be terrible for the reputation of the fleet. I know everybody wants to catch more fish but I think when we have a good strong run just give us more time, that would be best for the fish and the fishermen.



Submitted By
Brian Zwick
Submitted On
2/5/2015 7:05:53 PM
Affiliation
SE Gillnet

Phone
(907)821-0686
Email
Akdiver69@yahoo.com
Address
801peterson st.
Ketchikan , Alaska 99901

As a commercial gillnetter I am opposed to proposition 209 it will result in more sockeye catch rates and the allocated fish with Canada then my fishing days will be cut back and result in costing me money

I'm also opposed to prop #210 if we start using monofilament net we'll have the same result with catching the treaty sockeye and my fishing days will be cut back which will cost me money. I bought into this fishery for a long term financial means if either of these proposition pass I most likely won't be able to make my income that I need. Thank you.



Submitted By
Buck Laukitis
Submitted On
12/3/2014 1:47:09 PM
Affiliation

Phone
9072990112
Email
buck.magicfish@gmail.com
Address
59065 Meadow Ln
Homer, Alaska 99603

Dear Mr. Chairman;

I respectfully request that my name be added to the 58 foot vessel size limit definition committee that I understand will meet in Sitka. I have a fairly good understanding of this complicated issue. I own a vessel that could be affected by this confusing issue, and I have conferred with many vessel owners who are concerned about the outcome of these deliberations but who also would like to get to a sensible solution. I have been involved in the Board process for over 20 years and would come to Sitka for the meeting.

Thank you for your consideration.

Sincerely,

Buck Laukitis



Submitted By
Charles Clement
Submitted On
2/5/2015 7:26:59 AM
Affiliation

My name is Charles Clement--- Alaska resident and Area1 gillnetter for 47 years. Proposal 209 would jeopardize our treaty obligations with Canada. We currently are under the rolling average and that is good for relations and fishing time, giving more access to chums and pinks. I am against this proposal. I believe proposal 210 also fits into this category which I oppose.

Thank you

Charles Clement



Submitted By
David Klepser
Submitted On
2/3/2015 9:39:50 PM
Affiliation

Phone
907-617-5148

Email
Boondockdave@live.com

Address
Po box 8946
Ketchikan, Alaska 99901

My name is David Klepser I'm an Alaska resident and have been fishing
Commercially for 30 yrs.
I do not support proposal 210
Proposal 210 would allow the use of single strand monofilament
And would increase gear efficiency which would effect allocation between
Gear types.
" gear efficiency also increases as the number of strands decreases"
From the regional information report no 1j88-19 sept 1988
By alexanderdottir,Meir ,lynch"
And would be in direct conflict with the pacific salmon treaty
"Chapter 2section4"



Submitted By
David Klepser
Submitted On
2/3/2015 9:43:39 PM
Affiliation

Phone
907-617-5148

Email
Boondockdave@live.com

Address
Po box 8946
Ketchikan, Alaska 99901

My name is David Klepser I am an Alaska resident I've been commercial fishing southeast for 30 yrs.
I am against proposal 209 .

209 would be in direct conflict with the pacific salmon treaty

Which states "chapter 2, section4 "

" in order to accomplish the objectives of this chapter,neither
Party shall initiate new intercepting fisheries,nor conduct or
Redirect fisheries in a manner that intentionally increases interception"

This would effect districts 1,6,8,11.

If more sock eyes are harvested area and time constraints will occur
Thus negatively impacting the gillnet fleet financially .



Submitted By
Donald Klepser
Submitted On
2/3/2015 3:42:39 PM
Affiliation

I oppose proposal # 209

Increased effectiveness will have detrimental effects to the drift net fisheries. It will most likely increase the catch of sockeye, which the area 1 fleet is very close to the limit set by the Pacific Salmon Treaty. This will cause fisheries management to 1 reduce time, 2 reduce area and 3 enact mesh restrictions. This would also affect the numerous systems that are listed as stocks of concern. Increased efficiency during chum season will further skew the allocation between seiners and gillnetter on enhanced fish allocation. Any change that would reduce my fishing time and area, is not supported by me.



Submitted By
Donald Klepser
Submitted On
2/3/2015 3:53:34 PM
Affiliation

I oppose proposal # 210

The cost of gear is a small portion of my operating expenses. Mono gear would likely change the nature of the southeast drift fisheries. And anything that would effect the management and escapement of the fish is wrong in my beliefs.

This gear would change the way the fisheries are managed and effect escapement and treaty issues. Not to mention that it would also change the balance of the enhanced fish allocation between seiners and gillnetters... Fisheries management would likely have to 1 reduce fishing time, 2 reduce areas around stocks of concern or treaty fish areas. 3 enact mesh restrictions. Any of these consequences directly effects my ability to fish and earn a living.



Submitted By
mike fox
Submitted On
1/31/2015 3:38:59 PM
Affiliation

Reference proposals 131 and 132.

Further restrictions on SE Alaska Resident personal use fishermen is unreasonable and unjustified. Currently SE Residents are prohibited from taking any personal use King Salmon. They are also prohibited from taking any personal use Silver Salmon. (5AAC 77.682 c) And, they have very limited opportunities for taking any other personal use fish. It is completely unreasonable to further restrict SE Alaskan Residents' personal use fishing opportunities.

Further: 5AAC 77.682 c is an example of how the Board unfairly promulgates regulation that is contrary to AS 16.05.251 d which requires them to provide opportunities for Alaskan Residents to efficiently fulfill their personal use fish needs.



Submitted By
mike fox
Submitted On
1/31/2015 4:04:07 PM
Affiliation

Reference proposals 131 and 132.

These proposals unfairly further restrict personal use fishing opportunities for SE Alaskan residents.

The vast majority of SE Alaska Residents have almost no opportunity to efficiently fulfill their personal use or subsistence fish needs. For example: The board has banned all subsistence fishing in the Juneau area. Yet they allow commercial long line fishing throughout the Juneau area. It is extremely unfair to allow unlimited commercial long line fishing in the Juneau area, and further restrict personal use fishing opportunities. It is very unfair for local skiff fishermen to have to compete with commercial long liners near Juneau.

Another example: The board allows commercial salmon gillnet fishing and trolling all around Juneau. Yet, at the same time, they do not allow any subsistence fishing for any species, and on personal use fishing at all for Kings or Cohos.

It is completely unfair and unreasonable to further restrict SE Alaskan residents from efficiently fulfilling their personal use fish needs.



Submitted By
mike fox
Submitted On
1/31/2015 8:35:43 PM
Affiliation

Reference proposals 136 and 137.

These proposals unfairly further restrict personal use fishing opportunities for SE Alaskan residents.

The vast majority of SE Alaska Residents have almost no opportunity to efficiently fulfill their personal use or subsistence fish needs. For example: The board has banned all subsistence fishing in the Juneau area. Yet they allow commercial long line fishing throughout the Juneau area. It is extremely unfair to allow unlimited commercial long line fishing in the Juneau area, and further restrict personal use fishing opportunities. It is very unfair for local skiff fishermen to have to compete with commercial long liners near Juneau.

Another example: The board allows commercial salmon gillnet fishing and trolling all around Juneau. Yet, at the same time, they do not allow any subsistence fishing for any species, and on personal use fishing at all for Kings or Cohos.

It is completely unfair and unreasonable to further restrict SE Alaskan residents from efficiently fulfilling their personal use fish needs.



Submitted By
mike fox
Submitted On
1/31/2015 8:37:45 PM
Affiliation

Reference proposals 136 and 137.

Further restrictions on SE Alaska Resident personal use fishermen is unreasonable and unjustified. Currently SE Residents are prohibited from taking any personal use King Salmon. They are also prohibited from taking any personal use Silver Salmon. (5AAC 77.682 c) And, they have very limited opportunities for taking any other personal use fish. It is completely unreasonable to further restrict SE Alaskan Residents' personal use fishing opportunities.

Further: 5AAC 77.682 c is an example of how the Board unfairly promulgates regulation that is contrary to AS 16.05.251 d which requires them to provide opportunities for Alaskan Residents to efficiently fulfill their personal use fish needs.



FEBRUARY 2, 2014

TO THE ALASKA BOARD OF FISHERIES:

MY NAME IS RUDY FRANULOVICH. I HAVE DRIFT GILLNETTED IN THE DISTRICT 1 [TREE POINT] AREA SINCE 1969. I OPPOSE PROPOSAL 209.

I HAVE CONCERNS OF THIS PROPOSAL ON THE FISHERY THAT OCCURS IN DISTRICT 1 OF S. E. ALASKA. THIS PROPOSAL WOULD DOUBLE THE DEPTH OF GILLNETS THAT ARE USED NOW. BY DOUBLING THE DEPTH THE CATCH OF TREATY SOCKEYE SALMON WOULD BE INCREASED.

THE DISTRICT 1 FISHERY IS REGULATED BY INTERNATIONAL TREATY WITH CANADA.

CHAPTER 2 SECTION 4 OF THE U.S. CANADA TREATY: IN ORDER TO ACCOMPLISH THE OBJECTIVES OF THIS CHAPTER, NEITHER PARTY SHALL INITIATE NEW INTERCEPTING FISHERIES, NOR CONDUCT OR REDIRECT FISHERIES IN A MANNER THAT INTENTIONALLY INCREASES INTERCEPTIONS

IF MORE SOCKEYE ARE HARVESTED TIME CONSTRAINTS WOULD OCCUR ON THE EARLY SEASON OPENINGS, PRIMARILY JUNE AND JULY, THERE-BY LIMITING GILLNET CAPABILITIES TO HARVEST EARLY CHUM SALMON. THIS WOULD NEGATIVELY IMPACT THE GILLNET FLEET FINANCIALLY.

DISTRICT 1 IS ALSO CONSTRAINED BY ESCAPEMENTS TO THE SOCKEYE INDICATOR STREAM LOCATED IN BOCA DE QUADRA [HUGH SMITH]. HUGH SMITH WITHIN THE LAST DECADE HAD BEEN DESIGNATED A STOCK OF CONCERN. REMEDIES WERE INACTED AND ESCAPEMENTS HAVE RISEN NOW TO ACCEPTABLE LEVELS. BY INCREASING DEPTH OF GILLNETS SOCKEYE CATCHES OF THIS STOCK WOULD ALSO INCREASE. AS OF NOW HUGH SMITH SOCKEYE EXPLPLOITATION RATES CAN APPROACH A 60 TO 80 PER CENT RATE. FAR TO HIGH FOR ADEQUATE RECRUITMENT TO SPAWNING GROUNDS.



OTHER AREAS OF CONCERN WHICH WOULD BE IMPACTED WOULD BE LAKE
MACDONALD SOCKEYE, U.S. CANADA TREATY STIKINE, AND U.S. CANADA TREATY TAKU.
OVER A PERIOD OF YEARS THE GILLNET FLEET HAS ACHIEVED A CONSISTENT BALANCE
OF CATCHES, ESCAPEMENTS, AND TREATY OBLIGATIONS WITH THE GEAR THEY
PRESENTLY FISH WITH.

THANK YOU FOR YOUR CONSIDERATION.

RESPECTFULLY:

A handwritten signature in cursive script that reads "Rudy Franulovich".

RUDY FRANULOVICH
P.O. Bx. 5433
KETCHIKAN, ALASKA
99901
907-617-5252



February 5, 2015

To: Board of Fish
A.D.F.G.

I am writing in support of Proposals 226, 178, 188:

1. I believe that troll caught chum salmon are the future of the southeastern troll fleet.
 - a. Sockeye from Bristol Bay and the Frazier River in B.C. have placed a ceiling on the price and demand for S.E. Coho.
 - b. B.C. will never acknowledge the tremendous contribution to stock abundance that the one mile high king abundance troll closed zone has achieved.
 - c. It is not in the best self interest of B.C. to ever allow more king and Coho harvesting off of S.E. Alaska.
 - d. This leaves the S.E. troll fleet one species with which to expand harvest opportunity-chum salmon.
2. Troll caught chums have a quality to price point ratio which has made them desirable to S.E. processors as a primary as well as a diversifying product.
3. Therefore we need to expand opportunity and access to the "Fish of the Future" for the S.E. troll fleet.
 - a. As the Board of Fish, your initiative is required to break the voting block of seiners and gillnetters on the NSRAA and DIPAC boards which have marginalized and blocked proposals to move trollers closer to parity with the goals of the 1994 S.E. Enhanced Salmon Allocation Plan.
 - b. Last, our 3% enhancement tax has paid for those chums. SSRAA can and has complied with the 1994 Enhanced Salmon Allocation Plan. Without you NSRAA and DIPAC cant. Help!!

With sincere thanks, Fred Sears
FV Pala II



Submitted By
Heather Meuret
Submitted On
1/26/2015 11:29:18 AM
Affiliation
Herring Research Biologist

Phone
9077471139
Email
bwoodyham@gmail.com
Address
5 Maksoutoff Street
Sitka, Alaska 99835

Addressing Proposal #117 5 AAC 01.716. Customary and traditional subsistence uses of fish stocks and amount necessary for subsistence uses. Lower the amounts reasonably necessary for subsistence for Sitka Sound herring.

The Southeast Herring Conservation Alliance is requesting a lower ANS based on their data. I would recommend this be rejected as ANS is already monitored annually in partnership with ADF&G Division of Subsistence and the Sitka Tribe of Alaska since 2002. Since 2010, staff from the Division of Subsistence spend over 1 week in Sitka during the herring egg harvest to assist the Sitka Tribe of Alaska with weighing eggs and recording weights. Additionally, ADF&G staff developed a conversion method and the survey instrument that is used during the subsistence herring egg harvester survey. This data is reported in an annual report published by the Division of Subsistence. What the Southeast Herring Conservation Alliance is proposing is not only duplicative of work that is already being done by the Department, it is un-necessary, especially coming from this industry group disguised as a conservation group. Also their methodology is questionable as their process is not transparent like the Division of Subsistence's is.

Additionally, I'd like to point out that the Southeast Herring Conservation Alliance proposals claims that they did not record data in 2011 because a local group prevented the harvest, when in fact it was the Alaska Wildlife Troopers. This group paid a non-resident to harvest subsistence herring eggs, a clear violation of the State's harvesting laws.



Submitted By
Heather Meuret
Submitted On
1/26/2015 12:22:55 PM
Affiliation
Herring Research Biologist

Phone
9077471139
Email
bwoodyham@gmail.com
Address
5 Maksoutoff Street
Sitka, Alaska 99835

PROPOSAL 125 - 5 AAC 27.160. Quotas and guideline harvest levels for Southeastern Alaska Area. Reduce the harvest rate and establish a maximum guideline harvest level for the Sitka Sound commercial sac roe herring fishery. I support this proposal submitted by Sitka Tribe of Alaska.

It is no surprise as the GHL increased over the past 10-15 years, the prices of herring sac roe has dropped dramatically. A simple lesson in economics explains this occurrence, as supply increases, demand decreases as does price. As supply decreases, demand increases. The Sitka Sound Sac Roe fishery has saturated its market as evidenced by low prices on tonnage and a healthy oversupply in Asia. In fact Asian markets, specifically Japan, prefer sac roe from San Francisco and British Columbia as opposed to sac roe from Sitka. For example in 2014, landings in Sitka have tripled while price per ton was about \$150. In 1996, prices were \$2,000 a ton and harvest levels were at 8,000 tons. Sitka could create a market for demand if they reduce the harvest levels. Sitka's herring sac roe harvest is solely dependent on Japan's interest, which has been losing interest in eating sac roe for many years now. It seems evident now that the only way to make any money off this fishery is to catch more fish.

Additionally, British Columbia is required to extract roe inside the province under employment measures by the government, whereas Sitka ships round-form fish with roe to Asia for them to extract. Sitka could be processing this herring roe in Sitka, creating jobs and demand for a high valued product. On a personal note, creating new herring products (e.g. kippered snacks, smoked fillets, pickled and canned) and processing them in Sitka would be a sustainable future for herring and for Sitkans who need jobs.



Submitted By
Heather Meuret
Submitted On
1/26/2015 2:36:59 PM
Affiliation
Herring Research Biologist

Phone
9077471139

Email
bwoodyham@gmail.com

Address
5 Maksoutoff Street
Sitka, Alaska 99835

PROPOSAL 122 - 5 AAC 27.160. Quotas and guideline harvest levels for Southeastern Alaska Area. Lower the spawning biomass threshold for Sitka Sound sac roe herring fishery from 25,000 to 20,000 tons. I submit these comments as I do not support this proposal.

The current regulation regarding threshold allocation of 25,000 tons was set during the previous BOF meeting in 2009. Since then, there has been no issue that would prompt a need to change the regulation. ADF&G has found no need to analyze nor justify a reason that there is a need for this regulation to be changed. This is purely an attempt by the industry to undermine ADF&G and the Sitka Tribe of Alaska, DBA "Southeast Herring Conservation Alliance," on the regulation set by the BOF. I encourage the BOF to not support this proposal, but allow for the current regulation to evolve so that a legitimate analysis and subsequent synthesis can be developed; which will be based on data, not the industry's whims and wishes.



Submitted By
Heather Meuret
Submitted On
1/26/2015 3:02:14 PM
Affiliation
Herring Research Biologist

Phone
9077471139
Email
bwoodyham@gmail.com
Address
5 Maksoutoff Street
Sitka, Alaska 99835

PROPOSAL 119 - 5 AAC 27.150. Waters closed to herring fishing in Southeastern Alaska Area. Remove the area locally known as the "core area" from the closed waters of District 13 in Sitka Sound.

PROPOSAL 120 - 5 AAC 27.150. Waters closed to herring fishing in Southeastern Alaska Area. Remove the area locally known as the "core area" from the closed waters of District 13 in Sitka Sound.

I submit these comments as I do not support either proposal. I would recommend these proposals both be rejected. The subsistence area does not affect the commercial sac roe industry in any comparable manner. The subsistence area allows for a subsistence priority opportunity, as required by state and Federal law. Both proposals are clearly an attack on subsistence harvesters by the industry, DBA "Southeast Herring Conservation Alliance." In 2012 the BOF voted in support of this proposal, but the industry is against it as it puts regulations on the location of where the fishery can occur so it will not interfere with subsistence harvesting.

ANS is already monitored annually in partnership with ADF&G Division of Subsistence and the Sitka Tribe of Alaska since 2002. Since 2010, staff from the Division of Subsistence spend over 1 week in Sitka during the herring egg harvest to assist the Sitka Tribe of Alaska with weighing eggs and recording weights. Additionally, ADF&G staff developed a conversion method and the survey instrument that is used during the subsistence herring egg harvester survey. This data is reported in an annual report published by the Division of Subsistence.

What the Southeast Herring Conservation Alliance is proposing is not only duplicative of work that is already being done by the Department, it is un-necessary, especially coming from this industry group disguised as a conservation group. Also their methodology is questionable as their process is not transparent like the Division of Subsistence's is.

Additionally, I'd like to point out that the Southeast Herring Conservation Alliance proposals claims that they did not record data in 2011 because a local group prevented the harvest, when in fact it was the Alaska Wildlife Troopers. This group paid a non-resident to harvest subsistence herring eggs, a clear violation of the State's harvesting laws.



Submitted By
Jacob Rodriguez
Submitted On
2/5/2015 6:56:43 PM
Affiliation

Phone
2069981906

Email
Jjrod44@hotmail.com

Address
Box 5691
Ketchikan , Alaska 99901

I'm againts proposition 209 because the deeper nets will catch to many sockey. I'm also against proposition 210 for the same reason.



Submitted By
Jeffrey McKean
Submitted On
2/6/2015 10:54:33 AM
Affiliation
Gillnetter

I oppose proposal 209.

This proposal to change a gear regulation to increase the net depth from 60 mesh to 120 mesh with 4 and 7/8" as maximum mesh size could bring up unintended consequences. It could increase the Enhanced salmon allocation imbalance, it could create friction at the Pacific Salmon treaty level, transboundary stocks, and could put recovering local sockeye stocks onto a list of concern.

I see favoring this proposal, being like a ride on a big ferris wheel, we go up, then back around and down. The gillnetters could be back in front of the Board of Fish lamenting that we need to fish to keep our jobs, but you will be looking at the list of problems and deciding on very drastic solutions.

There is an economic component, not all SE Alaska gillnet boats have a net reel large enough for this increase volume of gillnet. Sure there will be an increase in capital spending in the local machine shops, but the world fish market buys fish. If the gillnet fleet cannot fish because of new restrictions, it could be, at the bottom please exit at the gate.



Submitted By
Joseph Lyle Weyhmiller
Submitted On
2/6/2015 7:30:54 AM
Affiliation
CTA

Thank you for your consideration of the following comments. Trollers are willing and skilled enough to catch a full allocation when given the appropriate opportunities per the current allocation program.

I OPPOSE PROPOSAL 175 submitted by Donald Churchill asking the BoF to establish a task force to “*revisit the current allocation plans effectiveness since inception and recommend any changes.*” The 1994 Board of Fish’s *Findings 94-148-FB* creates the 27-32% troller allocation, with the seiners 44-49% and the glitters 24-29%.

The Board of Fish’s 94-148-FB is a wise and workable document. There is NO problem with the allocation formula. The issue is more closely related to the lack of oversight in implementing those 1994 BoF Findings.

Our northern hatchery association reps have been largely unsuccessful in advancing proposals favorable to troller opportunity. Proposals presented to the Northern Regional Planning Team (RPT) are met by the same opposition at the hatchery level. Consequently, most troll proposals for improved opportunity have failed at NSRRA and again at the RPT. Proposal 176 effectively addresses this problem.

I SUPPORT PROPOSAL 176 submitted by CTA, the Chum Trollers Association, to add oversight to the 1994 BoF Findings. It asks NSRAA and DIPAC to each submit a yearly plan to the BoF detailing what policies and practices they will put in place to bring the gear group *lowest in allocation* into range through improved opportunity. Our hatchery managers and staff are talented, science-based and innovative. Biologists at ADF&G are first rate. Proposal 176 provides a workable solution. It can be done as shown by SSRAA’s long history of striving to get all three gear groups to their allocation in the southern program.

Proposal 176 adds oversight to a sound management plan which *ultimately benefits all three gear groups*. The Board of Fish’s 1994 Findings clearly lay out what steps *must* be taken to bring a gear group into allocation. Section 13 (A) of 94-148-FB states “*The joint RPT will make appropriate recommendations through the Commissioner to facility(s) annual operating plan(s) to attain allocation goals.*” It requires hatcheries to take initiative to correct the imbalance in their areas. Its time to move forward in implementation of the management plan.

Thank you again for your consideration.

Joseph Weyhmiller, F/V Sugar



Submitted By
Karl Jordan
Submitted On
2/2/2015 7:14:13 PM
Affiliation
Commercial fisherman

I oppose proposal 175. Trollers can to their 1994 BoF allocation levels if given the opportunity to fish where the hatchery fish are abundant. Neets bay and SSRAA troll fisheries has proved that trollers can consistently catch. Please avoid further allocation battles by rejecting proposal 175.

I support proposal 176. It adds oversight to a sound management plan which ultimately benefits all three gear groups. The Board of Fish's 1994 Findings clearly lay out what steps must be taken to bring a gear group into allocation. Section 13 (A) of 94-148-FB states "*The joint RPT will make appropriate re ommendations through the Commissioner to fa ility(s) annual operating plan(s) to attain allo ation goals.*"