

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

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Bruce J Gabrys
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February 7, 2015

Chairman
Alaska Board of Fisheries
c/o ADF&G Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Sent by Fax: (907) 465-6094
(2 pages)

Subject: SUPPORT Proposal 210, Use of Single Filament Mesh Salmon Gillnet.

I support this proposal to allow the use of single filament mesh in a commercial salmon drift gillnet in the Southeastern Alaska Area. Implementation of this proposal provides a substantial cost savings to gillnet fishermen. Single filament gillnet webbing is much less costly for manufacturers to produce than the multi-filament gillnet webbing currently required by regulation in Southeastern Alaska. This results in a 30% to 50% cost savings to gillnet fishermen on net purchases.

The Alaska Board of Fisheries (BOF) has authorized the use of single filament gillnet webbing in the Cook Inlet Salmon Drift Gillnet fishery since 2005 without any identifiable negative impact to the resource or user allocations. I am a long time Cook Inlet Salmon Drift Gillnet fisherman and thought that a brief review of the Cook Inlet BOF decision may be useful to the current Board as you deliberate on Proposal 210 for Southeast Alaska region:

1. During the November 2003 Statewide Finfish BOF meeting the use of Single Strand Gillnet Webbing (Proposal #7) was discussed. The proposal was reviewed and the Board discussed allowing the use of single strand gillnet webbing on an area by area basis. Therefore the Cook Inlet region portion of the proposal was tabled until the January 2005 Upper Cook Inlet BOF meeting.
2. For the January 2005 Upper Cook Inlet BOF meeting, Proposal 214 was generated by the Alaska Board of Fisheries to revisit the single filament gillnet webbing proposal. The proposal provided that "...in the Cook Inlet drift gillnet fishery, a person may use up to 50 fathoms of a 150 fathom drift gillnet of monofilament mesh web." The Board also proposed a sunset date of "December 31, 2007." This proposal was passed by the Board as an opportunity to validate the cost savings achieved and provide for a test period to assess the effectiveness of single filament gillnet as compared to multi-filament gillnet.
3. For the February 2008 Upper Cook Inlet BOF meeting, multiple proposals (102, 103) were submitted to provide in regulation the use of "up to 150 fathoms of monofilament mesh web in a drift gillnet" and to remove the December 31, 2007 sunset date. After Department comments, public comment, and board deliberations the use of 150 fathoms of single filament webbing was approved and the sunset date removed from regulation.



4. During this multi-year board cycle process, much of the opposition to the use of single filament gillnet webbing in our Alaska salmon fisheries was based upon reports on the Japanese High-Seas Drift fishery that uses monofilament gillnet webbing and a high "dropout" rate after the fish are caught. The "dropout" rate in the High-Seas fisheries is perhaps more attributable to the length of the nets and very long set times used in these fisheries than the type of gillnet web used. The Alaska salmon gillnet fisheries are coastal in nature, require the vessel to monitor the net, and have much shorter set times than the High-Seas fisheries. Comparing Japanese High-Seas fisheries to our Alaska Coastal fisheries is not valid or appropriate.

5. There is at least one study that I am aware of (Laboratory Leaflet Number 69, *Gill Netting*, authored by E.C.E. Potter and M.G. Pawson, from Ministry of Agriculture, Fisheries and Food Directorate of Fisheries Research, 1991) that compared "Monofilament netting versus multifilament netting" (page 19) and state: "These differing results probably reflect the variability in the materials used and suggest that the twine thickness, net dimensions and hanging ratio can have an effect on the way in which fish are caught, which is as great as the effect of the net material itself."

6. I have been fishing the single filament gillnet web in Cook Inlet since authorized by the BOF and have enjoyed significant cost savings when replacing the webbing. I have not noticed any measurable difference in the amount of fish caught in one type of webbing verses the other. My decision to use the single filament webbing is based upon the cost savings.

7. Some Cook Inlet salmon drift fishermen continue to use the multifilament gillnet web as a personal preference and are willing to pay the higher price. Some reasons I have heard for this preference is that the multi-filament webbing is easier on the fisherman's fingers when picking fish. Others have said the single filament webbing is harder to mend. It is my anecdotal observation that over time, as fishermen have a need to replace their gillnet webbing, a greater number are using the single filament webbing because it is much less expense.

Sincerely,

A handwritten signature in black ink that reads "Bruce J Gabrys".

Bruce J Gabrys



Submitted By
Jesse West
Submitted On
2/9/2015 9:35:16 PM
Affiliation

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Proposal 173 - 5 AAC 01.716

Strongly Oppose.

The path to solving Angoon's subsistence needs is unrelated to both hatchery production and interception of fish by commercial fisheries. There is no proof whatsoever that hatchery production of fish at Hidden Falls has any deleterious effects to fish stocks returning to local streams near Angoon.

In addition, there has been no hard, factual evidence that even a single Kanalku sockeye has been harvested by commercial fishermen, due to lack of sufficient genetic stock ID information. I support genetic stock ID, and am confident that the number of Kanalku sockeye and other local subsistence sockeye harvested by seiners and other commercial fishermen is insignificant. This is because the wonderful folks at the AK dept of Fish and Game have taken great pains to ensure that the vast majority of sockeye are already in stream by the time the seine fleet has a chance to fish anywhere close to them, by managing seine openings strategically to ensure that there is little to no run time overlap.

It is alarming that Kootznawoo's "solution" to the problem of not enough subsistence fish for themselves, will not make any more fish for the people of Angoon, but instead seeks to stop their friends and neighbors from harvesting both sustainable, successful, safe, and proven hatchery fish from NSRAA, and wild pink salmon in Chatham Straits via the seine fishery. It would be much more helpful, if this conversation is really about subsistence salmon, to turn the conversation inward, and look to help habitat at the Kanalku falls, which currently has a 50% mortality rate as found by USFS, as well as maintain sustainable, legal harvest of Kanalku sockeye so that fish stocks are plentiful for future generations, and equip the Angoon locals to fish not only Kanalku, but other streams traditionally used to harvest sockeye.

Proposal 193

Strongly Oppose.

No additional constraints are needed on the purse seine fishery in Northern Southeast. This is because, in addition to AK Dept of Fish and Game doing a wonderful job managing the fishery for sustainable commercial harvests in the future, Fish and Game also manages the commercial fishery to not interfere with subsistence stocks. In Northern Chatham and Icy Straits, this is done through run timing, so that no purse seining is done until subsistence stocks, including Kanlaku sockeye, are nearly completely up stream. In addition, there is almost no difference in subsistence stock numbers between consecutive years when zero commercial purse seining happened, versus the following year when very heavy harvesting was done in the area by purse seiners. Stock return numbers, when compared to fishing effort, show us that the first claim made in support of this proposal by Kootznawoo "high commercial purse seine effort in passing stock fishing areas in Icy Strait and Upper Chatham Strait has interfered with the ability of Angoon residents to meet their subsistence needs for salmon." is completely false. There is absolutely no cause and effect relationship here. It is obvious when viewing stock numbers. There is no discernable change in subsistence stock numbers between years with zero commercial seine effort and years with very heavy seine effort. Limiting seiners fishing time absolutely will not help Angoon meet its subsistence needs.

Proposal 194



Strongly Oppose

There is no reason to close portions of Lisianski inlet to accommodate for the troll fishery. Generally, trollers seem to use the mouth of the inlet as a jumping off point to fish further out towards the ocean, where seiners cannot fish. In addition, seiners and trollers do not target the same species, as seiners are fishing for pinks and most trollers find the pinks to be nothing more than a nuisance. In addition, the troll fleet does not seem to have any difficulty fishing around seiners, as they quite are manuevarable when trolling and are generally fishing deeper than seines can. In response to the high tech spotter boats, there is only one spotter boat that drives around Lisianski and calling it high tech is laughable.

Proposal 195

Strongly Oppose

There is no reason to close any of Lisianski Inlet to seining for coho conservation, as very few cohos are intercepted by the seine fleet, and never targeted. ADF&G has done a great job managing this area for all species and there is no reason to change any portion of the management.

Proposal 196

Oppose

There is no reason to establish a new statistical area in Lisianski Inlet because the current statistical areas have allowed for a successful and abundant harvest year in and year out.

Proposal 197

Oppose

Same reason as above. With these sorts of micro statistical areas, you might as well force every seiner to log exactly what gps position their net was in during each individual tow.

Proposal 198

Oppose

It is obvious that ADF&G has a close eye on these waters and that they are in no danger of being destroyed, but closing these waters permanently would make it very difficult to open them in the future, at a time when their may be an extreme abundance of salmon in the area, making a commercial fishery viable, if not necessary.

Proposal 199

Strongly Oppose



As subsistence stock numbers have shown us, closing waters in the possessory boundary of Angoon will not give the desired result of more subsistence fish to the Angoon people. As defined above in response to Proposal 173 and 193, there is absolutely no reason to close these waters and doing so will do nothing to benefit Angoon's subsistence fisheries, but it will do severe damage to the economy of Southeast Alaska.

Proposal 200

Strongly Oppose

As subsistence stock numbers have shown us, closing waters within the Admiralty Monument will not give the desired result of more subsistence fish to the Angoon people. As defined above in response to Proposal 173 and 193, there is absolutely no reason to close these waters and doing so will do nothing to benefit Angoon's subsistence fisheries, but it will do severe damage to the economy of Southeast Alaska.

Proposal 201

Strongly Oppose

As subsistence stock numbers have shown us, closing certain waters of Chichigof and Admiralty Island will not give the desired result of more subsistence fish to the Angoon people. As defined above in response to Proposal 173 and 193, there is absolutely no reason to close these waters and doing so will do nothing to benefit Angoon's subsistence fisheries, but it will do severe damage to the economy of Southeast Alaska.

Proposal 203

Strongly Oppose

While seining has become a more efficient fishery than it was in the past, this is the nature of competition in Alaska. With the increase in efficiency has come a reduction in fleet size, as well as an understanding by managers of the efficiency of the fleet, which they have been very successful at managing. There is no need for this regulation. In addition to this, it is still mother nature (i.e. the tide and currents) that makes your seine move the very fastest, and setting a speed limit would likely hurt most some of the fishermen with older equipment, yet sharper minds, who use the tide and currents to their advantage to move their seines.

Proposal 204

Oppose

Spotter planes flying during open fisheries not only help fisherman to be more efficient, but also give very valuable information to fish and game and hatchery managers about what is happening in both open and closed areas. Banning planes during open fisheries would make it more difficult to manage the fishery, would be difficult to enforce, and is unnecessary.



Oppose

The future of unmanned aircraft is extremely uncertain and jumping to a regulation before even the FAA has made any decisions is jumping the gun.



Submitted By
Joel Randrup
Submitted On
2/9/2015 2:38:56 PM
Affiliation
Self-Gillnetter

To the Board of Fish,

I do not support proposal 209 - 5 AAC 33.331. Gillnet specifications and operations. Allow drift gillnets with mesh size of four and seven-eighths inches or less to have a depth of up to 120 meshes...

I represent myself and my comments are my own. At the Petersburg AC meeting I heard the Fish and Game say they would not be comfortable with this proposal because of the uncertainty of the CPUE. If adopted it would probably result in less fishing time for gillnetters. This is the reason I do not support it.

Thank you,

Joel Randrup



Submitted By
Joel Randrup
Submitted On
2/9/2015 2:45:58 PM
Affiliation
Self-Gillnetter

To the Board of Fish,

I do not support proposal 210 - 5 AAC 33.331. Gillnet specifications and operations. Allow the use of single filament mesh in a commercial salmon drift gillnet in the Southeastern Alaska Area, as follows...

I represent myself and my comments are my own. At the Petersburg AC meeting I heard the Fish and Game say they would not be comfortable with this proposal because of the uncertainty of the CPUE. If adopted it would probably result in less fishing time for gillnetters. This is the reason I do not support it.

Thank you,

Joel Randrup



Submitted By
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2/9/2015 1:42:46 PM
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Testimony to the Alaska Board of Fisheries concerning: proposals 181 and 184 and the "Recommendations to the Alaska Board of Fisheries from the Joint Southeast Regional Planning Team".

The following testimony was written on behalf of the Southern SE Regional Aquaculture Association (SSRAA) Board of Directors (John Burke, SSRAA General Manager).

Background: SSRAA is a not-for-profit corporation whose Board of Directors is comprised of 21 people, 13 of whom are commercial fishermen holding designated gear-group seats. The willingness of SE Alaska fishermen to annually tax themselves 3% of the ex-vessel value to fund SSRAA (and NSRAA) is the fiscal cornerstone of the corporation. SSRAA derives most of its operating revenue from the harvest of chum salmon in the Neets Bay Special Harvest Area.

SSRAA operates 5 of its own hatcheries, one state facility through contract with the Division of Sport Fish, and currently underwrites the operations of the Klawock Hatchery (Prince of Wales Hatchery Association). Summer and fall chum, summer and fall coho, and chinook salmon are produced in these facilities. SSRAA has conducted sockeye rehabilitation projects when those projects were deemed warranted. SSRAA does not produce pink salmon.

There are a number of remote release sites (Nakat Inlet, Kendrick Bay, Anita Bay and Neck Creek) currently associated with the program. These sites are deliberately situated so that returning fish are primarily harvested in traditional common property fisheries with "clean up" fisheries in the terminal SHA's.

The fishermen members of the Southern SE Regional Planning Team (RPT) are members of the SSRAA Board. These individuals comprise half the fishermen on the Joint SE RPT. NSRAA fishermen comprise the other half of the Joint RPT fishermen. The Joint SE RPT is specifically tasked by the SE Alaska Allocation Plan with recommending actions to restore or maintain the agreed balance in the harvest value of enhanced fish between the gear groups.

SSRAA Board Recommendations:

1. Support the "Recommendations to the Alaska Board of Fisheries from the Joint Southeast Regional Planning Team." This document was submitted independently from the Joint SE RPT to the Board on 9 February.
2. Support Proposal 181 - 5 AAC 40,XXX. District 6: Neck Lake Special Harvest Area. Establish a Neck Lake Special Harvest Area, as follows....

This proposal was submitted by ADF&G and is what has been called in the past, "a housekeeping proposal". When the Neck Lake summer coho project was initiated in 1996, SSRAA agreed with ADF&G stipulation that these fish be removed from the water at the terminal point of the return. The fish return to Neck Creek, which is barriered by a series of water falls at the point of high tide. SSRAA installed a fish pass in Neck Creek at this point allowing the fish to move into a raceway above the lower falls. The fish are harvested from that raceway. The Department annually issues an EO that in essence opens the raceway to allow cost recovery harvest. The EO has always included the intertidal area of Neck Creek in the event that SSRAA might be required to collect broodstock from fish holding in the creek. Proposal 181 moves this ongoing annual situation (EO) into regulation.

3. Support Proposal 184 - 5 AAC 33.377. District 2: Kendrick Bay Terminal Harvest Area Salmon Management Plan. Open Kendrick Bay Terminal Harvest Area to commercial salmon fishing with troll gear...

All of the SSRAA Special Harvest Areas (SHA's) or Terminal Harvest Areas (THA's), including Neets Bay, Anita Bay, and Nakat Inlet are generally open to troll gear whenever they are open for common property harvest. Kendrick Bay is the exception. When it was first designated the Kendrick Bay Terminal Harvest Area was intended for seine gear; but, it was not the intent of the SSRAA Board to exclude trollers. At that time trollers were not interested in harvesting chum salmon. That is no longer the case as there are now significant chum troll fisheries in SE Alaska, including the Neets Bay SHA. It is not SSRAA's intent to modify the original use of Kendrick Bay as a designated seine area; but, it is not incompatible to include troll as SSRAA has done in its other SHA/THA's. Troll gear cannot compete with seine in a terminal chum harvest and because of this they wouldn't normally participate. It is possible, under some circumstances, that seiners might choose not to fish in Kendrick creating a situation that would represent an opportunity for troll.



We don't believe this would result in gear conflict since it is not our intent to exclude seine and in essence trollers would not find this a realistic opportunity - while seiners were fishing. But, in the rare event that seiners didn't chose to participate, and to make this consistent with all other SSRAA SHA/THA's, we would like to add the opportunity for trollers to participate in Kendrick..

Mr. Chairman and the the Board of Fish.
In support of 176.



PC 106
1 of 4

I am writing to you as the owner/operator of a commercial troller for 38 years with trolling as my sole means of income.

THERE'S A LOOPHOLE IN THE 1994 PLAN.

As the vanguards of the 1994 S.E. Alaska Enhanced Salmon Allocation Plan, Proposal 176 should be of the highest priority.

The Plan doesn't have any firewalls to protect against....

INTENTIONAL NON-COMPLIANCE,

How do I know this?

I've been fishing since 1975. I included chum to my repertoires in 1992. More than 10 years ago a few of us chum trollers started asking our troll reps on the hatchery association boards for more troll access to chums.

Over time, we noticed that SSRAA consistently managed to get all kinds of fish to trollers...kings, cohos, AND chums. But their northern counterparts couldn't. To understand this we asked the SSRAA board how they managed it. They told us their board understood that the 1994 S.E. Enhanced Salmon Allocation Management Plan and it's 14 Guiding Principles required "fair and reasonable" sharing. So that's what they do.

But NSRAA and DIPAC don't.

That's when it came to us. No matter the moral (and possibly legal) obligation for "fair and reasonable" sharing as prescribed by the 1994 Plan, without the will of the boards, two gear groups can deny access to a third gear group merely from the advantage point of having more votes.

THAT'S THE LOOPHOLE.

We like to say "it's two wolves and a sheep voting on what's for dinner".

Why do NSRAA and DIPAC do this?

\$0...MILLION...DOLLARS. That's the troll share of enhanced salmon left behind between 2006 and 2013.

Here's how the northern net groups work it.
A typical net argument will be...

1) We won't support your expensive king and coho programs if you ask for chum access. Of the 5 troll reps on the NSRAA board only 3 fish chum. So the troll reps work at cross purposes to one another.

But the truth is....

in 2013 NSRAA king salmon harvest was
netters 12,918
trollers 11,181

2014 NSRAA king salmon harvest
netters 5,402
trollers 6,048

How do the NSRAA chum harvests look?

2013 netters 2,956,387
trollers 455,490

2014 netters. 1,171,107
trollers. 16,726

To add insult to injury...65% of NSRAA's cost recovery was paid for by "OUR" expensive king and coho programs to subsidize "THEIR" chum programs in 2014.

2) In 2014, in order to stay compliant with the law, DIPAC gave NSRAA a whopping 1.5 million dollars to relieve NSRAA of their cost recovery burdens in Deep Inlet. Rather than using this opportunity to assist the gear group farthest behind in allocation by allowing trollers

more time in the Deep Inlet THA, or any other troll project for that matter, the net groups simply opted to allow "NOT ONE DIME", literally, went to trollers.



PC 106
2 of 4

3) At the 2013 spring NSRAA board meeting the trollers brought a proposal asking for access in Deep Inlet. A parliamentary maneuver effectively kept this proposal from even being heard.

4) Under the guise of "increasing troll opportunity" the reps agreed to allow trollers 2 days a week in Deep Inlet. In previous years, when trollers had just one day a week, the net groups would squabble over who followed the troll day, referring to it as a "build up" day. This haggling was reduced when the NSRAA board decided to magnanimously allow trollers another day a week, but not consecutively. Now each of the net groups have a "build up" day. This terminology alone indicates the net groups full awareness the trollers will not be able to utilize these troll days in any meaningful way.

The secretary documented this very efficiently in the minutes of the 2013 spring NSRAA board meeting...the "build up" terminology, the statistical data, the DIPAC contribution, the maneuvering to prevent the trollers Deep Inlet proposal off the table.

5) Asking us to wait for new production is a favorite ploy. We are asked to withhold "hostile" proposals for promises made about troll priority or exclusive access in upcoming projects. As these projects come nearer to having significant returns the net groups make agreements amongst themselves to occupy these new chum projects. S.E Cove was offered to us years ago until as recently as April 2014, but in December 2014 we see the co- proposal 187 between SEAS and USAG requesting gillnet access as well. I suspect the northern net groups are using the troll underage as an excuse for new production. This is evidenced in Crawfish Inlet, A new NSRAA project meant to come on line as a troll project, but only for two years, "then we share".

As for DIPAC,...I can sum it up in just one sentence.
In 2014 the trollers got 1% of DIPAC's entire production.

This information is available to you on the associations websites.

But the following isn't.

Perhaps the most egregious aspect of the northern net reps behavior is intimidation and bullying. In April, while troll proposals were being drafted, an NSRAA troll representative came to a meeting to discourage the chum trollers from submitting any proposals concerning access to Deep Inlet and Hidden Falls. He claimed that these proposals were considered "hostile" and in retaliation the seiners would not support the trollers at the Chinook Salmon Treaty. Once again, out of consideration for troll and industry unity we withheld these proposals.

It get's worse. Here's the substantiated rumor that no one is willing to admit to openly. In early October the Alaska Trollers Association voted to support 176. In late October, during the Seattle Fish Expo, the seiners threatened ATA by saying they would not support the trollers at the upcoming Chinook Salmon Treaty if they did not withdraw support of 176. On December 2nd, two days before the RPT meeting in Petersburg, ATA held an emergency tele-conference to vote on withdrawing support for 176. Proposal 175 was added but I suspect that was a smokescreen. The vote was 10 in favor of withdrawing, 1 abstained.

In addition, when attempting to discuss proposals with SEAS and USAG we are purposefully ostracized, often responded to with belligerence, swearing, threats and false accusations. This form of intimidation seems to be designed to keep the trollers working not only at cross purposes with ourselves but with the rest of the industry as well. VERY FEW meaningful conversations are held outside the board rooms when no eyes are watching.

I resist bringing this up, but this seems to be the only forum in which I have an opportunity to make the board aware of these issues. As mentioned, the ATA comments are substantiated rumors but as for the rest I have proof.

Proposal 176 was born from the ashes of this long standing situation the trollers suffer under. We felt compelled to submit a proposal that would offer protection for ALL GEAR GROUPS, in every hatchery association board room in southeast, from the kind of grief this loophole allows... in an otherwise wonderful Plan

Thank you for your considerations.

Linda Danner
f/v Amberjack



In support of 184.

Mr. Chairman and the Board of Fish.

As chairman of the Chum Trollers Association I speak to you with one voice for 110 members.

The desire of the SSRAA Board to include the Kendrick Bay THA for troll gear is consistent with this organizations successful inclusion of trollers to their many programs.

The trollers inability to access enhanced salmon has been a major firewall preventing trollers from reaching their prescribed allocation range.

Although not all of the many shared areas between the seine and troll fleets are effective, it is helpful to include this Kendrick Bay THA rather than the exclusions presently in regulation.

This proposal would allow additional opportunity for two of the enhanced species intended for troll use, king and chum salmon.

The distances from Ketchikan to Kendrick Bay are severe, making anchorages a necessity. The allowance of troller access to the nearby anchorages without having to pull their gear during the managed spring king opening is important for better production and safety. In addition, it has been recognized that chum salmon harvest is an important inclusion to the equation if trollers are to bridge the gap in the allocation percentages.

Therefore, allowing trollers access to Kendrick Bay is "fair and reasonable" as prescribed by the 1994 S.E. Enhanced Salmon Allocation Plan.

In sincerity and respect,

Linda Danner

Chairman

Chum Trollers Association



Mr. Chairman and Board of Fish.
In support of 188.

As a troller of 38 years and chum troller of 15 years I have been on the ground floor of chum projects that have been offered to the troll fleet.

What often happens before the scenes that are playing out now..are trades. The trollers have agreed to withhold submission of proposals that ask for access to areas the net groups already fully utilize in exchange for new projects or increased production coming on line. The S.E. Cove project is an example of these unwritten promises (NSRAA spring troll report 2013 and S.E. Enhanced Salmon Allocation Workshop in 2009). Previous sacrifices have been made for this proposal. But with the ground floor so often turning to rubble(as evidenced by proposal 187) we no longer accept ineivrgle negotiations and ask the Board of Fish for protection.

Beyond this, 188 is an example to NSRAA of the block of time and area management techniques needed for the troll fleet to be successful, as demonstrated by SSRAA at Neets Bay where there are often 200 trollers participating.

The 5/2 rotation would pan out something like this. The first 5 days could be good for trollers, then 2 net days, then 2ish days for rebuild, 3 good troll days, 2 net days, 2ish days for rebuild, 3 good troll days...amounting to 3 or 4 days a week of effective fishing for trollers.

This management style is corrosive for the troll fleet. It makes it difficult to gather a committed troll fleet and it's processor counterparts. This management style DOES allow for more fish in the holds of the net groups. This is not unacceptable in itself BUT...

It offers the northern net groups a "wring their hands in glee" moment. Without significant participation of the troll fleet the net groups have the added benefit of arguing against future chum troll access.

This suggested proposal allows the net groups ample opportunity on both sides of this block of time, as well as interception in their traditional fisheries.

We wish them well.

Thank you for your consideration.

Linda Danner
f/v Amberjack



Submitted By
Matthew Lawrie
Submitted On
2/9/2015 10:40:12 PM
Affiliation

Phone
360 201 5595
Email
Matt.thusela@gmail.com
Address
P.O. Box 6006
Sitka, Alaska 99835

Proposal 227

I am in support of proposal 227. Reauthorization of the Northern Chatham Strait Enhanced Chum Troll Fishery (District 112-16), and removal of the four day/week restriction would allow for continued and expanded access by trollers working to harvest hatchery chum. This fishery, while not hugely productive in the two years it has been open, dovetails nicely with the nearby Icy Straits chum fishery, providing expanded grounds for a growing fleet, and offering up a means to harvest DIPAC chum that use the Chatham corridor rather than Icy Straits in their return to DIPAC facilities. Along with the District 14 fishery, the Northern Chatham fishery holds great promise in helping trollers toward their allocation goals as articulated in 5 AAC 33.364.

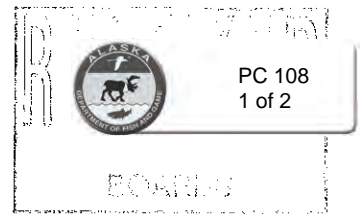
The original reasons for the sunset clause (unknown impacts on wild runs), and the four weekday restriction (potential conflicts with sport fisherman) have been shown to be of little concern and it seems reasonable and prudent to do away with both the sunset and four days/week provisions.

When the board approved the creation of the northern Chatham Strait enhanced chum troll fishery, the Icy Straight chum fishery had only been going on for two years. The impacts of the fishery on wild chum stocks were then unknown, and the sunset clause was put in place to allow for future changes to the plan. In five years of chum fishing in districts 12 and 14, the wild stock contribution has ranged from 15-20%. As wild stocks have met escapement goals in four of the five years from 2010 to 2014, it seems that the impacts of the chum fishery on wild stocks have been minimal. Because the concerns regarding impacts of this fishery on wild runs have thus far not been substantiated, I support removing the sunset clause in the District 12 and District 14 Enhanced Chum Salmon Troll Fisheries Management Plan.

As is stated in the body of proposal 227, the rationale for limiting this fishery to four days a week and precluding weekend access was out of concern for potential conflicts with Juneau based sports fishermen. As is also noted, there has been little interaction between trollers and sport fishermen in the last two years. While it is possible that an increase in available fishing days will result in a corresponding increase in troll effort in the area, the combination of restricting access to below Lizard Head Point, and the timing of this fishery seem likely to minimize potential conflicts.

The four day/week maximum has led to several problems for chum trollers wishing to access District 112-16, and these problems have led to a bit of a chicken-egg scenario with regards to getting this fishery off the ground. Though the district 14 fishery is conducted relatively close by, fishermen are none-the-less required to forgo fishing time to move between districts 14 and 12. This has led to a relatively low level of effort in the two years the district has been open. Because this fishery is conducted far removed from any land based infrastructure, it is entirely reliant on regular tender service, and the low level of effort and correspondingly low level of production has made the provision of tender service difficult, further reducing the viability of the fishery. If access were opened up to seven days/week, it seems likely that both the issue of lost fishing time and that of tender service would be alleviated as both effort and production would increase. Because conflicts with sport fishermen have not materialized, and because increasing the open days/week will increase the viability of the northern Chatham Strait fishery, I support removing the four day/week limit on this fishery.

Since the Southeastern Alaska Area Enhanced Salmon Allocation Plan was implemented in 1994, the troll fleet has been below its allocation in all but four years. Proposal 227 would work towards correcting this imbalance by increasing access to enhanced salmon for trollers while minimizing conflicts between user groups and adverse impacts on wild stocks.



Robert Briscoe
1043 Peace Portal Drive
Blaine WA 98230

February 9, 2015

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

Dear Board of Fisheries Members:

As a long-time Southeast Alaska salmon purse seine fisherman, I submit these comments to you on Proposal 202.

Proposal 202 asks the Board of Fisheries to clarify measurement standards for the salmon purse seine vessels operating in Southeast Alaska. Proposal 202 asks the BOF to either amend current regulation so that where an anchor roller ends and the hull begins is defined, or to draft a regulation that establishes a CFEC registry that requires CFEC to have federal documentation that establishes a vessel's length overall, which must be submitted to CFEC each year before a vessel can be issued a CFEC permit to operate in the Southeast Alaska salmon purse seine fishery.

I write in support of the second option. My boat has federal documentation (documentation issued by the Coast Guard and the shipbuilder) that sets forth the Length Overall (LOA) of my salmon purse seine vessel. This documentation establishes that my boat has been conclusively measured so that it qualifies as a 58-foot purse seine vessel. This documentation can be readily submitted to CFEC in order to obtain a permit. CFEC's vessel permit registration or renewal form can easily be amended to ask for such documentation for any vessel operating in this fishery. Each year, if the same vessel is operating in the fishery, CFEC's annual renewal application can have a box that can be checked to indicate that LOA paperwork has been submitted for the vessel that will be participating. If a vessel operator changes vessels, then they would submit the length documentation to CFEC to prove compliance with the regulation.



The Alaska Legislature adopted (first in 1970) AS 16.05.835, which deals with the maximum length of salmon seine vessels. That statute provides:

(a) Unless the Board of Fisheries has provided by regulation for the use of a longer vessel in a salmon seine fishery, a salmon seine vessel may not be longer than 58 feet overall length except vessels that have fished for salmon with seines in waters of the state before January 1, 1962, as 50-foot, official Coast Guard register length vessels. ...

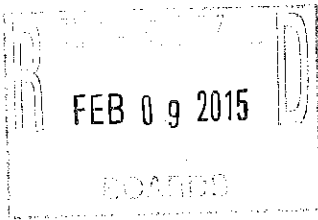
(c) In this section, "overall length" means the straight line length between the extremities of the vessel excluding anchor rollers.

CFEC statutes (AS 16.05.530(b) deals with vessel license renewals) reads that "the annual fee for a vessel license issued or renewed under this section is set according to the overall length, as defined by the United States Coast Guard"

Thank you for considering these comments.

Yours

Robert Briscoe



Doug Chaney
11719 Madera Drive SW
Lakewood, Washington 98499

February 9, 2015

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

Proposal 202

Dear Chair Johnstone and Board Members:

I am writing you about Proposal 202. Proposal 202 has two options for you to consider.

I think before taking any action on this proposal, I would like the Board to take this up in its committee process to get as much information as possible. That exchange of information will help Board members understand or dispel some "dock talk" about this vessel length matter. It appears that the Board will be taking up this proposal in committee in the afternoon on February 28 as part of the Group 6 proposals, and deliberate on group 6 proposal during the Boards afternoon meeting on March 1.

I support the second option in Proposal 202. My salmon purse seine boat has Coast Guard documentation which establishes the length overall and allows me to participate in southeast seine fisheries. I can readily submit that document to the CFEC, and it can keep track of boats that are participating and registered, and so it can require the necessary fee from us boat owners.

Thanks,


Doug Chaney



PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

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

February 9, 2015

VIA FACSIMILE (907) 465 -6094

Alaska Board of Fisheries
c/o Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115826
Juneau, AK 99811

Re: Southeast and Yakutat Finfish Board of Fisheries Meeting

Dear Board of Fisheries Members:

The Purse Seine Vessel Owners Association ("PSVOA") submits the following comments on certain proposals before Board at the upcoming Southeast and Yakutat Board of Fisheries meeting in Sitka. PSVOA represents purse seine vessel owners throughout Alaska and the Northwest, including Southeast Alaska.

Oppose Proposal 193 – Restrict salmon purse seine fisheries in Chatham Strait to 15 hrs/week

Oppose Proposal 199 – Prohibit salmon purse seine fisheries within boundary of Angoon

Oppose Proposal 200 – Close Admiralty Island to salmon purse seines

These proposals seek to severely limit or eliminate the purse seine fishery in most of District 12. The proponents of these proposals aver that broad time and area restrictions are necessary "to protect and maintain subsistence salmon and fisheries in the Chatham Straits Areas." However, as set forth in the Southeast Alaska Seiners Association's ("SEAS") comments in its February 9 letter to the Board of Fisheries, the commercial purse seine fishery's impacts on stocks that are important to subsistence fisheries in the area are *de minimis*. Conversely, these proposals would result in a large reduction in pink salmon harvest by the purse seine fleet. As SEAS points out, as recently as 2011 District 12 accounted for nearly 40% of the Southeast commercial salmon fishery.

ADF&G's management strategy currently in place for Chatham Straits provides ample protection for Kanalku sockeye and other local sockeye stocks. In most years, approximately 80% of the Kanalku sockeye run has migrated into, or near, the terminal area before the seine fishery commences in Chatham Straits. Recently completed genetic stock identification ("GSI") work, which was conducted in response to concerns raised by Angoon residents and the Federal Subsistence Board, provides further evidence that the seine fleet's incidental harvest of Kanalku sockeye is insignificant.



In sum, PSVOA respectfully requests that the Board reject Proposals 193, 199 and 200 based on the overwhelming empirical evidence that ADF&G's current management of the District 12 seine fishery does not adversely impact subsistence salmon fisheries in the Chatham Straits Areas.

Oppose Proposal 202 – Clarification of measurement standard for determining seine vessel length.

The rationale given for this proposal is "The 58 foot length limit for salmon seine boats needs clarification." In fact, the 58 foot limit is clearly defined in statute. AS § 16.05.835 provides in pertinent part: "[A] salmon seine vessel may not be longer than 58 feet overall length" The statute defines "overall length" as the straight line length between the extremities of the vessel excluding anchor rollers."

The proponent of this proposal requests this Board to adopt a regulation which incorporates the federal standards for determining vessel length, which are fundamentally different than the simple, straight forward method set forth in AS § 16.05.835. Under the federal measurement standards, a vessel can be technically classified as a 58 foot vessel even when the distance between the "extremities" of the vessel (bow to stern) is greater than 58 feet. Accordingly, this proposal which purports to "clarify" Alaska's 58 foot limit, would actually do away with the 58 foot limit as defined by statute and would allow seine vessels larger than 58 feet to participate in the Southeast salmon seine fishery.

Debating the continued rationale or validity of the 58 foot limitation cannot alter the fact it is the standard upon which permit holders have relied and the seine fleet has developed. Moreover, to allow vessels greater in length than 58 feet is inconsistent with the ongoing efforts to consolidate permits and reduce harvesting capacity in the Southeast salmon seine fishery.

Thank you for considering our comments.

Very truly yours,

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



RESOLUTION 2015-02-192

A RESOLUTION OF THE SAXMAN I.R.A COUNCIL FROM THE ORGANIZED VILLAGE OF SAXMAN IN SUPPORT OF SITKA TRIBES OF ALASKA FISH PROPOSALS 114, 118, 121, AND 125 WITH AN URGING TO THE STATE OF ALASKA TO ADOPT THESE FISH PROPOSALS FOR THE PROMOTION OF STRONG HERRING CONSERVATION AND SUBSISTENCE HARVEST NEEDS AND TO OPPOSE INDUSTRY FISH PROPOSALS 117, 119, AND 122.

WHEREAS, the Organized Village of Saxman is a duly constituted Indian Tribe organized pursuant to the authority of the United States Congress by the Indian Reorganization Act, and such legislation of June 8, 1934, and the Saxman I.R.A. Council is authorized by the Organized Village of Saxman Constitution and By-laws approved on October 18, 1940 by the Secretary of Interior, and ratified on January 14, 1941, as the Organized Village of Saxman's governing body; and

WHEREAS, the Organized Village of Saxman is a federally recognized Tribal Government with all powers and responsibilities inherent in a sovereign government and has the authority to represent and act in all matters that concern the health, education, and welfare of the Native people who reside in the Village of Saxman; and

WHEREAS, the Organized Village of Saxman has a responsibility to steward the land, water, and other natural resources to maintain a cultural subsistence way of life for future generations; and,

WHEREAS, the Organized Village of Saxman seeks to accurately represent the concerns of the Tribe; and,

WHEREAS, currently the Sitka Sound herring stock is the only remaining and surviving herring stock in Alaska that supports a viable subsistence harvest; however this remaining stock is at stake if management is complacent and unwilling to develop sound conservation measures; and

WHEREAS, throughout the Southeast Alaska region the herring species has drastically declined and herring stock has been pushed to the brink of extinction in other Southeast Alaska regions;

WHEREAS, the State of Alaska Board of Fisheries has due diligence with a powerful position to preserve and bring recovery to increase herring stock and promote herring conservation for all, and

WHEREAS, the Organized Village of Saxman supports management for increased subsistence use and for conversation to prevent herring stock from being fished-out like other areas in Southeast Alaska region, and supports a modification to proposals and supports as amended:



PROPOSAL 114. Herring Management Plan for Southeastern Alaska Area.

amended, "(7) shall allow spawning biomass to exceed minimum biomass thresholds for five (5) consecutive years before fishing can occur." To explain this amendment, currently, the Southeast Alaska Sac Roe Herring Fishery Management Plan harvests Pacific herring stocks exceeding minimum biomass thresholds determined by Alaska Department of Fish and Game. These thresholds are a measure of biomass available, but care needs to be taken when harvesting stock thresholds do not meet significant consistent stock increases in an adequate time period. Stocks that have been depressed, but recently show a spike in biomass, could be at risk of overharvest or be unsustainable if conservative measures, such as meeting thresholds for five consecutive years, are not put in place. Current thresholds do not allow for stocks to rebuild to pre-fishery biomasses and are managed under a shifted baseline. This proposal was submitted by Sitka Tribe of Alaska (STA) to address the management of herring sac roe fisheries throughout Southeast Alaska. Fisheries are not allowed to occur unless biomass projections meet established thresholds. Unfortunately, the State's management of herring stocks under a shifted baseline keeps these stocks in a severely depleted state. The majority of these stocks are allowed to "creep" above the established thresholds, then fished for a year or two and "knocked back down" below the threshold levels. If these stocks are lucky they build back up over time, some never recover. This proposal would require stocks be above the threshold level for five consecutive years prior to a fishery occurring. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels.

PROPOSAL 118. Sitka Sound Commercial Sac Roe Herring Fishery. Supports as amended, "(2) distribute the commercial harvest *over space and time* [by fishing time and area] *by allowing fifty (50) percent of the Guideline Harvest Level (GHL) to be harvested then allowing twenty-five (25) percent of the anticipated nautical miles of spawn to occur prior to harvest the remaining GHL* [if the department determines that is necessary] to ensure that subsistence user have a reasonable opportunity to harvest the amount of herring spawn necessary for subsistence uses specified in 5 AAC 01.716(b)." To explain this amendment, at the 2012 preseason stakeholder meeting, the Sitka Sound commercial herring fishery manager was asked, "considering that subsistence needs were only met twice in the last seven years, how do you plan on changing the way you manage the fishery over space and time to ensure a more reasonable opportunity exists for subsistence needs to be met?" He replied that he was not going to change the way he managed the fishery and that he felt there were other variables (outside of the fishery) that affected the subsistence harvest. Although there may be variables outside the manager's control that affect the subsistence harvest, those variables need to be taken into account when managing the one variable he can control, the commercial sac roe fishery. This proposal will force the distribution of the fishery over time to ensure a more reasonable opportunity exist for subsistence needs to be met. What would happen if nothing is done? The fisheries manager's refusal to change the way the fishery is managed over space and time will continue to result in a high frequency of needs not being met. Other solutions considered: Administrative action is the only remedy at this time. Subsistence herring egg harvest data shows that the amount necessary for subsistence is not being harvested and subsistence needs are



not being met 50% of the time, since data collection began in 2002. Although fishery managers are required by law to allow a reasonable opportunity for subsistence needs to be met, the Sitka Fish and Game Managers refuse to change the way the fishery is managed to give harvesters a greater opportunity to meet their needs. Currently the fishery harvests the majority, if not all of the Guideline Harvest Level (GHL) prior to the start of the spawn and at the beginning of the subsistence harvest. This proposal would require fishery managers to only allow 50% of the GHL to be harvest prior to 25% of the anticipated nautical miles of spawn being recorded. Managers would use the projected biomass and the ten (10) year average spawn deposition to calculate out this 25%.

PROPOSAL 121. *Waters Closed to Herring Fishing in Southeastern Alaska Area.* Supports as amended, "(7) District 18, in the waters encompassed by a line extending from the western most tip of Makhnati Island, to the northern most tip Aleutski Island, to the Baranof Island shore at the O'Connell Bridge, north along the Baranof Island shoreline, to Harbor Point, to the northern most point of Big Gavanski Island, from the western most point of Big Gavanski Island, to northwestern tip of Crow Island, to Bieli Rocks, and ending at western most tip of Makhnati Island." To explain this amendment, in the last 13 years, subsistence needs (amount necessary for subsistence) have been met six times, with needs only being met twice in the last seven years (2007-2013). The harvest of herring by the sac roe fishery in or adjacent to the core subsistence herring egg harvest area disrupts pre-spawn and spawning herring and has a negative impact on the quantity and quality of the subsistence harvest. In 2012 the Board of Fisheries modified a similar proposal and approved a closure area approximately half the size of what was requested. The closure of this approved area was adhered to in 2012 and 2013; unfortunately the ANS was not met in either of those years. Closure of the full area requested will increase the opportunity for the ANS to be met. At the 2012 Board of Fisheries meeting in Ketchikan, STA requested the area described in this proposal be closed to commercial fishing to protect the core subsistence harvest area. The Board approved the closure in an area about half of the size. This closure has helped the subsistence harvest to some degree but the area needs to be expanded to provide greater protection to the subsistence harvest and increased opportunity for needs to be met. This proposal is a re-submittal of what was asked for in 2012.

PROPOSAL 125. *Quotas and Guideline Harvest Levels for Southeastern Alaska Area.* Supports as amended: "(g) The guideline harvest level for the herring sac roe fishery in Sections 13-A and 13-B shall be established by the department at [and will be] a harvest rate of ten (10) percent of the spawning biomass....The guideline harvest level shall not exceed 10,000 tons." To explain this amendment, the current Guideline Harvest Level (GHL) for the Sitka Sound sac roe fishery is exceeding market demand and is one of the variables affecting subsistence herring egg harvester's ability to meet their needs or the amount necessary for subsistence. A proposed ten (10) percent GHL with a 10,000 ton cap would maximize the value of the resource to the sac roe fishery, other commercial, sport, and subsistence fisheries (salmon, ground fish, etc.), and the ecosystem. The proposed amendments would increase subsistence herring egg harvest opportunities under the same premise that the State's Hatchery Program operates



under that, putting/leaving (in the case of herring) more fish in the water to support harvest opportunities. The Sitka Sound herring stock has declined by 70% since 2011, at the same time the ex-vessel value of the stock is the lowest it's been in the last 20 years and there is a high frequency of subsistence needs not being met. By cutting the harvest rate in half and placing a hard cap on the GHL, this proposal will increase the economic value of the fishery and leave more herring in the water to support the ecosystem and subsistence harvesters.

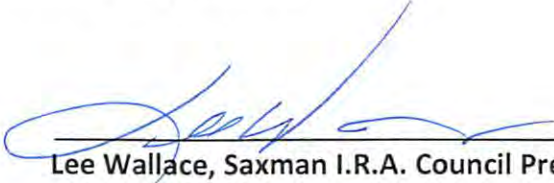
WHEREAS, the Organized Village of Saxman to oppose Industry Fish Proposals 117, 119, and 122 as these proposals are counter to a viable subsistence fishery and will place everyone at risk.

BE IT RESOLVED BY THE COUNCIL OF THE ORGANIZED VILLAGE OF SAXMAN to strongly support Sitka Tribes of Alaska Fish Proposals 114, 118, 121, and 125 and to oppose Industry Fish Proposals 117, 119, and 122.

CERTIFICATION:

PASSED and **APPROVED** by a duly constituted quorum of the Saxman I.R.A. Council on February 4, 2015 in Saxman, Alaska by a vote of 3 YES, 0 NO, and 3 ABSENT.

ATTESTED:



Lee Wallace, Saxman I.R.A. Council President 2.4.15
Date

 2-4-15

Harvey Shields, Saxman I.R.A. Council Secretary Date



Dear Chairman Johnstone and the Alaska Board of Fisheries,

As a stakeholder in the marine ecosystem and the health of the local economy, I firmly support these important proposals regarding herring management in Southeast Alaska:

Proposals 114 and 115—I support this region-wide proposal to require herring stocks to be above their minimum stock biomass for five consecutive years before a sac-roe fishery (seine or gillnet) can occur. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels. The closures of all sac-roe fisheries except Sitka Sound this year shows that depleted stocks need more time to recover.

Proposal 118—I support this proposal to only harvest 50% of the Guideline Harvest Level over 25% of the anticipated nautical miles of spawn before a temporary commercial closure. This proposal would slow down the rate of commercial harvest, allowing greater opportunity for subsistence harvesters to meet their needs.

Proposal 121—I support this proposal to increase the size of the subsistence only zone in Sitka Sound. The closure has helped subsistence harvesters to meet some of their needs, but more area is necessary for subsistence harvesters to continuously meet their needs.

Proposal 125—I support this proposal to reduce the harvest rate to 10% and to place a cap on the commercial sac-roe harvest at 10,000 tons. This will increase the economic value of the roe harvested and leave more herring in the water to support the ecosystem and subsistence harvesters.

Despite these excellent proposals to sustain commercial and traditional herring industries, there are several proposals which will remove conservation measures put in place by the Board of Fisheries. These proposals will crash the Sitka Sound herring populations, ruining both commercial and subsistence livelihoods. I do not support the following proposals:

Proposals 116 and 117—I *do not support* this proposal which would reduce the Amount Necessary for Subsistence (ANS). The results of ADF&G Division of Subsistence herring harvester survey shows that the ANS is achievable, and that there is a high frequency of needs not being met.

Proposals 119 and 120—I *do not support* this proposal to close the subsistence only area in Sitka Sound. This proposal would remove existing protections that make it possible for subsistence harvesters to meet their needs.

Proposal 122—I *do not support* this proposal to reduce the biomass threshold for the Sitka stock from 25,000 tons to 20,000 tons. This proposal would remove existing conservation measures enacted by the Board of Fisheries and will be detrimental to the health of the marine ecosystem.

I hope you can take my comments into account for the upcoming Board of Fisheries meeting in Sitka February 23-March 3.

Mabel Kochutin
Signature

01-29-15
Date

Mabel Kochutin
Printed Name

104 Skuler Dr.
Street Address

244-6163
Contact Phone

Sitka, AK 99835
City, State and Zip



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Proposals 114 and 115—I support this region-wide proposal to require herring stocks to be above their minimum stock biomass for five consecutive years before a sac-roe fishery (seine or gillnet) can occur. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels. The closures of all sac-roe fisheries except Sitka Sound this year shows that depleted stocks need more time to recover.

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I hope you can take my comments into account for the upcoming Board of Fisheries meeting in Sitka February 23-March 3.

Marilyn Fayton
Signature
Marilyn Fayton
Printed Name
623-0930
Contact Phone

2-8-15
Date
110 Andrew Hope
Street Address
Sitka, AK 99835
City, State and Zip



Dear Chairman Johnstone and the Alaska Board of Fisheries,

As a stakeholder in the marine ecosystem and the health of the local economy, I firmly support these important proposals regarding herring management in Southeast Alaska:

Proposals 114 and 115—I support this region-wide proposal to require herring stocks to be above their minimum stock biomass for five consecutive years before a sac-roe fishery (seine or gillnet) can occur. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels. The closures of all sac-roe fisheries except Sitka Sound this year shows that depleted stocks need more time to recover.

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I hope you can take my comments into account for the upcoming Board of Fisheries meeting in Sitka February 23-March 3.

Tyler Payton
Signature

2-8-15
Date

Tyler Payton
Printed Name

110 Andrew Hopse st
Street Address

907-738-8483
Contact Phone
623-0930

Sitka AK
City, State and Zip



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Proposal 125—I support this proposal to reduce the harvest rate to 10% and to place a cap on the commercial sac-roe harvest at 10,000 tons. This will increase the economic value of the roe harvested and leave more herring in the water to support the ecosystem and subsistence harvesters.

Despite these excellent proposals to sustain commercial and traditional herring industries, there are several proposals which will remove conservation measures put in place by the Board of Fisheries. These proposals will crash the Sitka Sound herring populations, ruining both commercial and subsistence livelihoods. I do not support the following proposals:

Proposals 116 and 117—I *do not support* this proposal which would reduce the Amount Necessary for Subsistence (ANS). The results of ADF&G Division of Subsistence herring harvester survey shows that the ANS is achievable, and that there is a high frequency of needs not being met.

Proposals 119 and 120—I *do not support* this proposal to close the subsistence only area in Sitka Sound. This proposal would remove existing protections that make it possible for subsistence harvesters to meet their needs.

Proposal 122—I *do not support* this proposal to reduce the biomass threshold for the Sitka stock from 25,000 tons to 20,000 tons. This proposal would remove existing conservation measures enacted by the Board of Fisheries and will be detrimental to the health of the marine ecosystem.

I hope you can take my comments into account for the upcoming Board of Fisheries meeting in Sitka February 23-March 3.

Andrew L Roberts
Signature

2-2-15
Date

Andrew L Roberts
Printed Name

PO Box 2075
Street Address

(907) 738-0741
Contact Phone

Sitka AK 99835
City, State and Zip



Dear Chairman Johnstone and the Alaska Board of Fisheries,

As a stakeholder in the marine ecosystem and the health of the local economy, I firmly support these important proposals regarding herring management in Southeast Alaska:

Proposals 114 and 115—I support this region-wide proposal to require herring stocks to be above their minimum stock biomass for five consecutive years before a sac-roe fishery (seine or gillnet) can occur. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels. The closures of all sac-roe fisheries except Sitka Sound this year shows that depleted stocks need more time to recover.

Proposal 118—I support this proposal to only harvest 50% of the Guideline Harvest Level over 25% of the anticipated nautical miles of spawn before a temporary commercial closure. This proposal would slow down the rate of commercial harvest, allowing greater opportunity for subsistence harvesters to meet their needs.

Proposal 121—I support this proposal to increase the size of the subsistence only zone in Sitka Sound. The closure has helped subsistence harvesters to meet some of their needs, but more area is necessary for subsistence harvesters to continuously meet their needs.

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I hope you can take my comments into account for the upcoming Board of Fisheries meeting in Sitka February 23-March 3.

Tommy J. Jimmie
Signature
Tommy J. Jimmie
Printed Name
(907) 321-5230
Contact Phone

3 February 2015
Date
345 GASTINEAU AVE Apt. 2C
Street Address
JUNEAU, AK 99801
City, State and Zip



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As a stakeholder in the marine ecosystem and the health of the local economy, I firmly support these important proposals regarding herring management in Southeast Alaska:

Proposals 114 and 115—I support this region-wide proposal to require herring stocks to be above their minimum stock biomass for five consecutive years before a sac-roe fishery (seine or gillnet) can occur. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels. The closures of all sac-roe fisheries except Sitka Sound this year shows that depleted stocks need more time to recover.

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I hope you can take my comments into account for the upcoming Board of Fisheries meeting in Sitka February 23-March 3.

Kenneth Jackson
Signature

Kenneth L Jackson
Printed Name

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FEB 8, 2015
Date

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LAKA, ALASKA 99630
City, State and Zip



Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

February 9, 2015

Dear Board of Fisheries,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government for over 5,000 tribal citizens located in Sitka, Alaska. As a tribal government, STA is responsible for health, welfare, safety and culture of its citizens. STA provides the following comments on Board of Fisheries (BoF) proposals 114, 115, 116, 117, 118, 119, 120, 121, 122 and 125.

Herring not only play a role as forage fish in the marine food web but they have also been an integral part of the Native culture in Southeast Alaska for over 10,000 years. This once abundant ecological and cultural keystone species thrived throughout the region. Over exploitation by the commercial fishing industry has eradicated spawning herring population from a significant portion of the regions waters. The regions remaining herring stock survive in a significantly depleted state.

STA supports BoF proposals 114, 115, 118, 121, and 125. These proposals address real conservation concerns that affect not only herring stock biomasses throughout Southeast Alaska, but all who utilize these herring. These concerns arise from; the management of Southeast Alaska herring stocks under a shifted baseline, the significant decline in biomass of the Sitka Sound herring stock in the last 4 years, the lack of in season management for conservation, and most notably the inability of managers to accurately assess the ocean survival of juvenile herring prior to recruitment. All of these proposals provide an extra level of conservation, benefit subsistence and all other direct and indirect users of the resource, and still provide for a profitable commercial fishery.

STA is opposed to BoF proposals 116, 117, 119, 120 and 122. These proposals are unwarranted, generated out of greed and would have devastating impacts on the region's herring stocks, the ecosystem, and subsistence harvesters and other users of this invaluable resource.

Alaska's constitution requires the State's resources be managed for the maximum benefit of all Alaskans. The Board is encouraged uphold Alaska's constitution and follow STA's lead when voting on these proposals.

If you have any questions regarding these comments or these proposals contact STA's Resource Protection Director Jeff Feldpausch at (907)747-7469 or email jeff.feldpausch@sitkatriben-sn.gov.



Sincerely,

Michael A. Baines

Michael Baines
Council Chairman



Submitted By
Thatcher Brouwer
Submitted On
2/9/2015 4:50:47 PM
Affiliation

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

Dear Alaska Board of Fish Members:

Thank you for the opportunity to submit written comments on Southeast Alaska Finfish proposals. I own and operate a commercial freezer troller in Southeast, Alaska. I am proud to be a resident, commercial fisherman and I am grateful for the work Alaska Board of Fish and Department of Fish and Game have do to ensure our fisheries are managed in a sustainable manner. Thanks to this sound, science based management the fisheries will support Alaskans for generations to come. I offer written comments for your consideration on a number of Board of Fish, finfish proposals for the Southeast, Alaska board cycle.

PROPOSAL 136

I support proposal 136 with an amendment to reduce harvest limit for the personal use sablefish fishery to 25 fish rather than the 50 fish limit in the proposal. I fully support an individual's right to participate in the personal use sablefish fishery, but I strongly believe a reasonable limit needs to be put into place. As the fishery gains popularity I think it is important that the needs of personal use fisherman are balanced with the needs of the other users of the limited sablefish stocks. Twenty-five sablefish seems like an adequate number of fish for an individual to consume during the course of the year.

PROPOSAL 159

I support proposal 159. Alaska Department of Fish and Game has done an excellent job managing both the sport and commercial fisheries to date, but I am concerned that the stocks are already fully allocated and if there is an increase in nonresident fishing participation it may become problematic in the future. The daily nonresident bag limit is 6 fish of each species. The proposed annual limit of three times this seems to allow nonresidents plenty of fish to take home with them. I think few individuals eat more than 72 salmon annually. A nonresident king salmon annual limit has proved to be an effective way to manage the Chinook salmon stocks. While I do not support an annual limit for residents, I believe an

annual limit for nonresidents is a logical way to ensure our fisheries are managed in a sustainable manner in perpetuity, while still allowing nonresidents plenty of fish to take home with them.

PROPOSAL 174

I oppose proposal 174. Alaska Department of Fish and Game does a fine job managing the Taku River Chinook fishery. They have tools to ensure that escapement is met, and it has been met almost every year. I cannot support an allocative proposal, especially when there is not a conservation concern about Taku River Chinook returns.

PROPOSAL 175

I oppose proposal 175. This is not the time to revisit the enhanced salmon allocation plan. There will be a number of new hatchery projects coming on line within a few years. The commercial troll fisheries has historically been well below their enhanced salmon allocation, but enhanced salmon still holds great value for troll fishermen. Additionally, with the new hatchery projects and different fishing techniques commercial trollers will likely come closer to their enhanced salmon allocation that they pay for.

PROPOSAL 208



I support proposal 208 amended to limit the mesh size restriction until July 1st. When there is no directed king salmon fishery it makes sense to limit the mesh size of the gillnets so they are not incidentally catching king salmon. This mesh restriction would still allow gillnetters to effectively participate in the directed sockeye fishery and this seems like a logical compromise that are consistent with the District 11 fisheries and allows king salmon stocks to be protected during years of low abundance.

PROPOSAL 224

I support proposal 224. Allowing the Alaska Department of Fish and Game to implement trip limits when there are not enough Chinook on the table to allow a competitive opening would be an effective way for the troll fleet to catch all the treaty Chinook they are entitled to. The commercial troll fleet has left Chinook salmon on the table eleven times since 1985. With a simple registration program the department would know how many boats plan to participate in the fishery and then the department of Fish and Game could set the trip limit and allow the trollers to catch the Chinook salmon they are entitled to catch.

PROPOSAL 228

I oppose proposal 228. Proposal 228 is not based on sound science. The Alaska Department of Fish and Game does an excellent job managing the summer troll fishery and determining the length of the closure based on the strength of the Coho run. Simply mandating a ten day closure is not the way to manage a fishery. If the City of Angoon has conservation concerns the department has tools to address those issues.

PROPOSAL 230

I oppose proposal 230. Commercial trollers have always had the opportunity to fish throughout Alaska when the summer troll season opens on July 1st. To limit the fishing time for trollers in district 15-C is an unprecedented, allocative action. In addition to having historic access to District 15-C trollers have not been able to meet catch the percentage of enhanced salmon they are allocated. Fishing opportunity in District 15-C allows the trollers to target enhanced salmon.

PROPOSAL 231

I oppose proposal 231. Proposal 231 is another proposal that is not science based, sets a dangerous precedent and is allocative. If there are truly conservation concerns then the department has means to address them. Naha Conservation has submitted a number of proposals to restrict commercial fishing around their residences. It seems that they do not want sustainable commercial fishing in their back yard. Commercial fishermen have fished sustainably in Southeast, Alaska for years.

Thank you for considering my comments during the Board of Fish meeting in Sitka.

Sincerely,

Thatcher Brouwer

PO Box 22927

Juneau, AK 99802

907-723-2633

UNITED SOUTHEAST ALASKA GILLNETTERS



PC 115
1 of 8

PO Box 20538, Juneau, AK 99802 (253) 237-3099 usag.alaska@gmail.com
www.akgillnet.org

February 9, 2015

Mr. Tom Kluberton
Vice-Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Kluberton and Members of the Board:

Re: BOF Proposals Southeast Alaska Finfish 2015

We appreciate the opportunity to comment on the select proposals listed below.

The United Southeast Alaska Gillnetters (USAG) is an association of about 170 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast wide organization that seeks to represent the common interests of all 473 drift permit holders.

Our specific comments follow.

GROUP 3 Subsistence Salmon

Proposal 146. Customary and traditional subsistence uses of fish stocks and amount necessary for subsistence uses (Districts 12 & 14)

SUPPORT. This is a reasonable proposal.

Proposal 149. Modify weekly subsistence salmon fishing schedule for Klawock Inlet, Klawock River, and Klawock Lake

OPPOSE due to depressed stocks and concerns about increased pressure on these stocks.

Proposal 153. Allow subsistence harvest of salmon with purse seine and gillnet gear in portions of Districts 12 and 13 near Angoon

OPPOSE due to concerns for increased fishing pressure right at the mouth of salmon streams



Proposal 173. Customary and traditional subsistence uses of fish stocks and amount necessary for subsistence uses.

OPPOSE. Existing criteria, statutes, and regulations are adequate to address subsistence needs. Consultations can occur during the normal Board of Fisheries cycle by participation in Advisory Committees, public comment, and BOF meetings and task forces.

GROUP 4 Sport Salmon and Resident Species

Proposal 155. Allow party fishing in Southeast Alaska saltwater fisheries.

OPPOSE. This proposal would eliminate individual responsibility for sport fishermen and an increased harvest. This is of concern for the large number of non-residents that fish Southeast. Many stocks are fully utilized (e.g. chinook, rock fish, ling cod, blackcod) and any changes in bag limits should be addressed by individual species.

Proposal 157. Reduce the king salmon size limit from 28 inches or greater in length to 26 inches or greater in length

OPPOSE since this proposal would disrupt long term Chinook accounting data and affect both domestic and treaty allocations.

Proposal 158. Modify the Southeast Alaska King Salmon Management Plan by eliminating in season reductions to the annual limit

OPPOSE. The current measures in the Southeast Alaska King Salmon Management Plan are working with regards to allocation and provide a reasonable level of stability to the charter sector.

Proposal 159. Establish nonresident annual limits for coho, sockeye, chum, and pink salmon in salt waters of the Southeast Alaska Area

SUPPORT and amend to 2X the annual bag limit. Alaska should be promoting the fishing experience and minimizing the meat hunter aspects of non-resident fishing. The SE RAC's concerns about excessive amounts of fish being shipped out of state by non-resident anglers should be addressed.

GROUP 5 Taku River Management and SHA/THA Allocation

BOF Proposal 174. Establish a Taku River Salmon Management Plan

OPPOSE. We do not believe a management plan is needed at this time.

This river system is rigidly managed as a trans-boundary river with the Canadians and the allocation between the US and Canada is set by the treaty. ADFG has the necessary



management tools to successfully manage this system, even in times of low abundance. ADFG has met escapement goals for this system.

If you decide that a management plan is warranted, we suggest you establish a stakeholder task force to develop a plan for consideration at the 2018 BOF since this proposal is not time sensitive.

Proposal 175/176. Evaluate potential changes to enhanced salmon allocations

OPPOSE at this time. The JRPT process is working well to address enhanced allocation. Efforts by NSRAA to bring the Crawfish Inlet chum project on line will provide additional dedicated opportunity for chum trollers. Troller's ability to harvest chums varies since chums sometimes do not bite, and trollers may take advantage of king and Coho opportunities in preference to chum fishing.

BOF Proposals 177, 178, 179, and 180. NSRAA Special Harvest Areas

SUPPORT. These proposals are of a house keeping nature and eliminate the need for emergency orders which have been used on an annual basis for these areas. In addition, there are safety concerns in some of these areas and there is concern for protecting brood stock.

BOF Proposal 181. Establish a Neck Lake Special harvest Area

SUPPORT. Establishing the SHA will eliminate the need for annual EO's which have been used since 1998.

Proposal 182/183. Deep Inlet THA Management Plan

SUPPORT the rotation (183) agreed to by United Southeast Alaska Gillnetters, Southeast Alaska Seiners Association, Purse Seine Vessel Owners Association, and the Petersburg Vessel Owners. This was supported unanimously by the JRPT.

BOF Proposal 184. Open Kendrick Bay THA to Trollers

SUPPORT. Allowing trollers in this THA provides additional opportunity for the troll fleet and helps spread out the fleet.

Proposal 185/186. Deep Inlet THA Management Plan

SUPPORT the rotation (186) agreed to by United Southeast Alaska Gillnetters, Southeast Alaska



Seiners Association, Purse Seine Vessel Owners Association, and the Petersburg Vessel Owners. This was supported unanimously by the JRPT.

Proposal 187/188. Allow commercial salmon drift gillnet gear in Southeast Cove Terminal Harvest Area

SUPPORT 187. OPPOSE 188.

We SUPPORT (187) including the drift gillnet fleet in the Southeast Cove Terminal Harvest Area management plan as a tool to facilitate corrections to enhanced allocation imbalances that may occur in the future. The proposed management plan includes days and time but the NSRAA board will determine which groups should fish if a fishery is developed. It may be a case where one or possibly even two gear groups do not fish in the area for an entire year if there is only trolling and cost recovery. We recognize this. We are simply recognizing the drift gillnet fleets potential and variable opportunity as we would any groups opportunity as defined by the enhanced salmon allocation plan.

This has the potential to help spread out the gillnet fleet and be an incentive for local Kake residents to get into the gillnet fishery. This has been agreed to by United Southeast Alaska Gillnetters, Southeast Alaska Seiners Association, Purse Seine Vessel Owners Association, and the Petersburg Vessel Owners.

GROUP 6 Purse Seine

Proposals 190/191. Modify accounting of commercial sockeye salmon purse seine harvest limit in Amalga Harbor Special Harvest Area

SUPPORT proposal 190 and OPPOSE 191.

Proposal 190 has been agreed to by United Southeast Alaska Gillnetters Association, Southeast Alaska Seiners Association, Petersburg Vessels Owners Association, and Purse Seine Vessel Owners. We feel the proposed 2,000 wild sockeye limit on the Amalga harvest counting toward the Hawk Inlet cap is adequate protection; counting all wild Amalga sockeye (Proposal 191) toward the Hawk Inlet cap is not necessary at this time. This was supported unanimously by the JRPT.

Proposal 192. In Districts 12 and 14 require reporting of commercially caught sockeye salmon that are not sold

OPPOSE. This is already a statewide requirement and this would be redundant.



Proposal 193/199/200. Restrict and prohibit commercial salmon seining in portions of Districts 12 and 14.

OPPOSE since this would degrade ADFG's management flexibility during years of high pink salmon abundance. Based on run timing, the seine fleet has minimal impact on the Kanalku system. There appears to be adequate escapement in the Northern Chatham Strait sockeye system to support subsistence needs (RIR No 1J14-10 *Northern Chatham Strait Sockeye Salmon: 2014 Updated Stock Status, Fishery Management, and Subsistence Fisheries*)

Proposal 194/195. Close a portion of Lisianski Inlet to commercial salmon fishing with purse seine gear

OPPOSE since this would degrade ADFG's management flexibility during years of high pink salmon abundance.

Proposals 196/197. Establish new salmon statistical areas in District 13 in Lisianski Inlet

OPPOSE. Concur with ADFG comments.

Proposals 198/201. Establish closed waters around sockeye salmon streams in the Angoon area

SUPPORT 198 AND OPPOSE 201. ADFG's proposal 198 is more precise and better accomplishes the goals of proposal 201.

GROUP 7 Commercial Salmon

BOF Proposal 206. Clarify Boundary between Areas 15A and 15C at Sherman Rock

SUPPORT. This is a housekeeping measure and corrects an error that ADFG has identified in the regulations. This will result in less confusion for both fishermen and enforcement.

Proposal 207. Increase commercial drift gillnet salmon fishing opportunity in Section 6-D.

SUPPORT. This has been agreed to by both United Southeast Alaska Gillnetters Association, Southeast Alaska Seiners Association, Petersburg Vessels Owners Association, and Purse Seine Vessel Owners. This will provide additional opportunity for gillnetters and help to achieve the wild pink salmon allocation.



Proposal 208. Establish a drift gillnet mesh size restriction in District 8 when the directed king salmon fishery is closed as follows: "In District 8 during years of no directed king salmon fishing, the maximum mesh size allowed is six (6) inches."

OPPOSE. According to FMP 14-21 (*Annual Management Report of the 2013 Southeast Alaska Commercial Purse Seine and Drift Gillnet Fisheries*, page 34 (Apr 2014)), "The total number of large Stikine Chinook salmon harvested by District 8 gillnetters from SW 25 through 29 (during sockeye management openings) was 456 fish based on GSI estimates." 456 (2%) Chinook out of a preseason forecast of 22,400 is not sufficient justification to impose mesh restrictions. Incidental harvest of 456 large Stikine Chinook in a sockeye harvest of 20,609 can hardly be classified as targeting Stikine Chinook. While the total Chinook harvest in District 8 was 10,817 through SW 29, 93% were of Alaska salmon hatchery origin (Page 34). ADFG has sufficient EO authority to manage the gillnet fleet. The preliminary 2014 numbers show that we caught about half of 2013.

BOF Proposals 209. Gillnet Mesh Specifications for Pink Salmon

SUPPORT. The purpose of this proposal is to provide additional **opportunity for the gill net fleet to be more efficient and productive** in the **pink salmon fishery** in traditional and historical drift gillnet areas.

Our nets are designed to harvest larger species. Thus, our usual 60 mesh net may hang 30 plus feet if fishing for chums or sockeyes, or perhaps even 40 feet if for kings. But allowing for the much smaller pink salmon mesh size, our net shrinks to a mere 24 flat stretched feet, or about 20 feet or less while fishing. We need a deeper pink salmon net in order to harvest pink salmon.

By adopting regulations allowing nets of 4 7/8" or less mesh size to increase allowable mesh depth up to a maximum of 120 meshes. A current 4 7/8" 60 mesh net is approximately 24 feet in total depth, without tide and current. The 60 mesh net likely fishes at a depth of less than 20 feet (calculating for wind, tide and drift), allowing the majority of pink salmon to swim under the net. By doubling the allowable depth to 120 meshes or approximately 48 feet, perhaps 36-40 fishable feet (again calculating for wind, tide and drift, this will increase the opportunity for the drift gillnet fleet to harvest pink salmon and thus diversify the drift gillnet fishery for participants. It also gives the drift gillnet fleet the opportunity to gain on historical pink salmon harvests in traditional and historical drift gillnet areas. Net lengths will be in accord with existing regulations.

ADFG has expressed concerns that increased meshes would result in increased harvest and changes in performance data. According to FMR No 14-31 (*Annual Management Report for the Southeast Alaska Commercial Purse Seine and Drift Gillnet Fisheries*), from the 2003-2012 ten year average, gillnetters harvested 1,058,112 pinks and seiners harvested 34,465,820 pinks -- in other words gillnetter harvested 3 % of the combined pink harvest. An increased gillnet pink harvest would appear to have minimal impact. Any changes in harvest would likely be incrementally slow and could be factored into CPUE models over time.



NMFS Protected Resources raised speculative (e.g. “may result”, “greatest potential concern”) concerns about changing mesh depth and monofilament in their letter of February 5, 2015. While an increase in mesh depth would result in an increase in total net area in the water column, this could be mitigated by reduced fishing time as harvest limits are achieved.

NMFS expressed concern about a possible decline in harbor porpoise in Districts 6 & 8 (Wrangell) and points to gillnetting as the cause. NMFS does not appear to consider the possible impacts of killer whale predation/population, changing water temperatures (including El Nino and Pacific Decadal Oscillation), changes in food availability and locations (e.g. herring), and changes in shipping patterns/rates. We are also aware of reports of changes in salmon migration patterns more prevalent during the noted years of low harbor porpoise abundance. SSRAA has proven that returning adult salmon shifted from returning through Sumner and Clarence Straits to a returning pattern that shifts south, outside and around Prince of Whales Island.

Population Declines of Harbor Porpoise (Phocoena phocoena) in Inside Waters of Southeast Alaska (NMFS Poster, 2011) Table 1, shows abundance estimates in the Wrangell Area 1991 (N=475), 1992 (N=149), 1993 (N=268), 2006 (N=139), 2007 (N=152), and 2010 (N=149). In looking at these data we note that 1991 was the highest year but we do not know if this is the norm or if numbers since then are the norm. 1993 shows an increase of 79% over 1992—is this a real change, problems with surveys, or a reflection of migratory patterns or changes in food availability?

The *2014 Draft Stock Assessment Report of Southeast Alaska Harbor Porpoise* describes problems with surveys, incomplete coverage of the entire region, and lack of a reliable population estimate. This quote (Page 161) is illustrative, “*The abundance of for harbor porpoises occupying the inland waters of Southeast Alaska of 1,081 9CV=0.15 represents only a small area within the entire stock boundaries. Therefore, this number would not be an accurate estimate for N (min) for the entire stock of Southeast Alaska harbor porpoises.*”

BOF Proposal 210. Allow the use of single monofilament mesh in the commercial salmon drift gillnet fishery in Southeast Alaska

SUPPORT. While not all gillnetters would choose to use monofilament, it would provide an attractive cost savings without materially affecting the prosecution of the fishery or conservation. Monofilament is already in use in Cook Inlet.

See our comments on Proposal 209 regarding both ADFG and NMFS comments.

GROUP 8 Troll

BOF Proposal 225, 226, and 227. Change the sunset date in the District 12 and 14 Enhanced Chum Salmon Troll Fishery Management Plan.



We SUPPORT the JRPT's Proposal 225 to extend the sunset date to December 31, 2017 and OPPOSE Proposals 226 and 227. Further information is needed on the impacts of this fishery before it is made permanent.

There is anecdotal evidence that because of the small lures and slow speeds associated with chum trolling, that there are a significant amount of very small sub-legal king salmon incidentally being caught in this new fishery. These small Chinooks must be released by the troll fleet, but with a 25% mortality rate, there may be significant risk to out migrating Taku and Chilkat river fish; both runs that can ill afford incidental at sea mortality.

In addition, increased area and time could result in an increase in wild chum interception, resulting in loss of time and/area for the seine and gillnet fleets who are currently managed on wild abundance.

Proposal 228. Close the commercial troll fishery for Coho salmon from August 1–10
OPPOSE. Concur with ADFG comments on the proposed loss of flexibility with escapement based management.

BOF Proposal 229. Allow commercial salmon fishing with troll gear in an area between North Chatham Strait and Homeshore (District 12 & 14).

OPPOSE. There is anecdotal evidence that because of the small lures and slow speeds associated with chum trolling, that there are a significant amount of very small sub-legal king salmon incidentally being caught in this new fishery. These small Chinooks must be released by the troll fleet, but with a 25% mortality rate, there may be significant risk to out migrating Taku and Chilkat river fish; both runs that can ill afford incidental at sea mortality.

In addition, increased area and time could result in an increase in wild chum interception, resulting in loss of time and/area for the seine and gillnet fleets who are currently managed on wild abundance.

Proposal 231. Reduce the area open to commercial salmon fishing with troll gear in Naha Bay during the summer

OPPOSE. We do not feel a sanctuary a good idea and we concur with ADFG's concern about loss of management flexibility and the lack of a conservation issue.

Again, thank you for the opportunity to comment on these proposals.

Sincerely,

A handwritten signature in blue ink that reads "Tom Gemmell".

Thomas M Gemmell
Executive Director