



UNITED FISHERMEN OF ALASKA

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February 26, 2015

Tom Kluberton, Chairman
Glenn Haight, Executive Director
Alaska Board of Fisheries
Alaska Dept of Fish and Game, Boards Support
PO Box 115526
Juneau, AK 99811

RC 65

RE: Comments on southeast finfish Board of Fisheries proposals 146, 193, 198, 199, 200 & 201

Dear Chairman Kluberton and members of the Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. UFA members are commercial, sport, personal use, and subsistence harvesters. Among our member groups, seven represent salmon fisheries in Southeast Alaska and four are Southeast-based salmon aquaculture associations. We offer the following comments on current Board of Fisheries proposals related to the petition for extraterritorial jurisdiction by Kootsnoowoo Inc.

Support proposal 146, Customary and traditional subsistence uses of fish stocks and amount necessary for subsistence uses: We support this proposal by the Alaska Department of Fish and Game to update the amounts necessary for subsistence for salmon in Districts 12 and 14.

Support proposal 198, Establish closed waters around sockeye salmon streams in the Angoon area, and oppose proposal 201, Close certain waters of Chichagof Island and Admiralty Island to commercial salmon fishing with purse seine gear: We support proposal 198 by the Alaska Department of Fish and Game to codify longstanding areas of closure that have been enacted by emergency order to protect subsistence opportunity in the Angoon area. We oppose proposal 201 which would have similar effect, but with less preferable language.

Oppose proposals 193, Restrict and prohibit commercial salmon seining in portions of Districts 12 and 14, proposal 199 - Prohibit commercial fishing for salmon with purse seine gear within the possessory boundary of Angoon for five years, and proposal 200 - Close waters within the Admiralty Monument proclamation boundary to commercial fishing for salmon with purse seine gear: Genetic stock identification (GSI) sampling conducted by ADF&G in 2012 - 2014 has demonstrated very low interception of the Kanalku sockeye in Chatham Strait seine fisheries for those years. Proposals 193, 199, & 200 were written prior to publication (February 2015) of the ADF&G GSI report which refutes the proposal's fundamental suppositions*

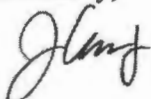
UFA opposes proposal 193, Restrict and prohibit commercial salmon seining in portions of Districts 12 and 14, that would restrict the department's management flexibility by allowing no more than one 15-hour opening every seven days in District 12 sub-districts 12, 13, 14, 16, and 17 and District 14 sub-district 27, and would prohibit purse seines in District 12 sub-district 15 and District 14 sub-district 12 and 23. The department has a long history of management of the Chatham Strait purse seine fishery with timings to avoid impacts on Angoon area sockeye harvest, as detailed in comments by Southeast Alaska Seiners and Southeast Alaska Fishermen's Alliance. The additional tool of the Commissioner's emergency authority to close a fishery at any time provides assurance that in-season closures can be enacted should the fishery cause interference with the legitimate subsistence needs of the Angoon community.

We oppose proposal 199 - Prohibit commercial fishing for salmon with purse seine gear within the possessory boundary of Angoon for five years and proposal 200 - Close waters within the Admiralty Monument proclamation boundary to commercial fishing for salmon with purse seine gear: that would prohibit commercial fishing for salmon with purse seine gear within the possessory boundary of Angoon for five years (proposal 199) and within the Admiralty Monument (proposal 200). We feel that these proposed closures are arbitrary in the areas proposed for closure, and do little or nothing to increase opportunity for subsistence harvest in the Angoon area. These proposals would have a large detrimental effect on the opportunity for commercial harvest and would interfere with the department's ability to manage within escapement goal ranges in years of high pink salmon abundance.

We reference comments submitted by UFA member organizations regarding these proposals related to the opportunity for subsistence for residents of Angoon, including those by Alaska Trollers Association, Northern Southeast Regional Aquaculture Association, Petersburg Vessel Owners Association, Purse Seine Vessel Owners Association, Southeast Alaska Fishermen's Alliance, Southeast Alaska Seiners, and United Southeast Alaska Gillnetters. Our affected member groups have provided ample detail to the board in their own comment letters, and we support their positions on these proposals.

Thank you for the opportunity to comment, please reach out to one of our member organizations if you have any questions.

Sincerely,



Julianne Curry
Executive Director

*Gilk-Baumer, Sara; Olive Serena D.; Harris, David; Heint, Steven; Fox, Elisabeth K.; Templin, William D. 2015. *Genetic Mixed Stock Analysis of Sockeye Salmon Harvest in Selected Northern Chatham Strait Commercial Fisheries, Southeast Alaska, 2012 - 2014*. Divisions of Sport and Commercial Fisheries of Alaska. Alaska Department of Fish and Game, Fishery Data Series No. 15-03, Anchorage.