

**On-Time Public Comment List
Statewide Finfish and Supplemental Issues
March 8-11, 2016**

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February 2, 2016

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

Dear Chairman Kluberton,

Herring are one of most important forage fish swimming in Alaska's waters. In their role as forage fish, herring transfer energy from phytoplankton and zooplankton up the marine food chain to upper trophic level finfish (salmon, halibut, rockfish, etc.), marine birds, and marine mammals. As an ecological keystone species, herring support the base of the marine food web and are fundamental to the success of Alaska's sport, subsistence, and commercial fisheries as well as tourism. Herring have had a profound effect on Alaska Native cultures for thousands of year as a direct food source and indirectly by supporting the marine ecosystem which provides additional subsistence foods. Herring are so engrained in the lives and history of Alaska Natives they are considered a cultural keystone species.

Skagway Traditional Council **supports proposal 209**, which would add herring to Alaska's Forage Fish Management Plan. This would not affect existing fisheries but simply acknowledge herring as a forage fish in regulation, and allow for future protection of a valuable resource.

In order to continue managing herring and other forage fish for future generations' best use, Skagway Traditional Council **supports proposal 210**. This proposal would ban the development of directed forage fish fisheries for the purposes of fishmeal production. This means that if future industries find that fishmeal production from forage fish is a profitable option for Alaskan commercial fisheries, it would make it illegal to develop them into fishmeal fisheries. This would continue to Alaska's record in protecting species before its necessary.

Proposal 211 would ban the production of fishmeal from whole forage fish caught in existing forage fish fisheries. As an example, existing herring sac roe fisheries only utilize 12% of the harvest (herring egg sacs) for the sac roe market, a vast majority of the remaining harvest is turned into fishmeal. Assuming equal proportions of males and females, proposal 211 would prevent half of the existing harvest (males) from being turned into fishmeal. Skagway Traditional Council **supports proposal 211**.

Skagway Traditional Council hopes the Board of Fisheries can take our comments into account when deciding on these important proposals for the future use and maximum benefit for all Alaskans, regardless of their role in the commercial fishery. The loss of herring to the ecosystem is second only to the loss of herring as a cultural resource.

Sincerely,

Jaime Bricker, Tribal Council Chair/President





Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

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 respectfully submits the following comments in support of Board of Fisheries proposals 209, 210, and 211, and in opposition to proposals 126-2014-2015 and 216.

Herring are one of most important forage fish swimming in Alaska's waters. In their role as forage fish, herring transfer energy from phytoplankton and zooplankton up the marine food chain to upper trophic level finfish (salmon, halibut, rockfish, etc.), marine birds, and marine mammals. **As an ecological keystone species herring support the base of the marine food web and are fundamental to the success of Alaska's sport, subsistence, and commercial fisheries as well as tourism.** Herring have had a profound effect on Alaska Native cultures for thousands of year as a direct food source and indirectly by supporting the marine ecosystem which provides additional subsistence foods. Herring are so engrained in the lives and history of Alaska Natives they are considered a cultural keystone species.

Along the west coast of North America from California to British Columbia herring are acknowledge in regulation as a forage fish. However, in Alaska, that is not the case. The plan identifies several forage fish species and lists exemptions for those species that are being harvested in current fisheries **but it fails to identify herring as a forage fish.**

Eulachon (family Osmeridae) are identified in the Forage Fish Management Plan (FFMP; attached) as a forage fish and are harvested under 5AAC 33.520 Southeastern Alaska Area Eulachon Smelt Management Plan (attached). Interestingly, both the FFMP and the Eulachon Management Plan became effective July 21, 1999. This precedent is further justification for listing herring as a forage fish and proves that such a listing will not affect existing herring fisheries. STA fully supports proposal 209 and believes it is time for Alaska to follow the rest of the world's lead and identify herring as a forage fish in regulation.

Proposal 210 and 211 address the production of fishmeal from Alaskan forage fish and although they are similar, they address two slightly different issues. Proposal 210 would ban the development of directed forage fish fisheries for the purposes of fishmeal production. Although such fisheries **currently** do not exist, this proposal preemptively prevents their establishment. Proposal 211 would ban the production of fishmeal from whole forage fish caught in existing forage fish fisheries. As an example, existing herring sac roe fisheries only utilize 12% of the harvest (herring egg sacs) for the sac roe market, a vast majority of the remaining harvest is turned into fishmeal. Assuming equal proportions of males and females, **proposal 211 would prevent half of the existing harvest (males) from being turned into fishmeal.**

The global demand for fishmeal, combined with declining origin fish stocks, has resulted in a 150% increase in fishmeal prices in the last five years. Fish meal is used in the production of livestock feed, fertilizer, and aquaculture feed. The majority of the fishmeal and associated fish oil, roughly 74%, used in aquaculture feed and is going to feed farm salmon (Undercurrent News, June 2015), mostly produced out of the United States.

Turning Alaska's forage fish into fishmeal to feed farmed salmon decreases production costs, allowing foreign-farmed salmon to compete with Alaska's commercially harvested salmon. **Removing herring from Alaskan waters takes food out the mouths out of important fishes to Alaska's sport, commercial, and subsistence harvesters.** STA firmly believes leaving our forage fish in the water to support the ecosystem is the maximum benefit for **all Alaskans** than the small gain from turning them into fishmeal.

STA opposes proposal 126-2014-2015, which would allow for an open pound herring roe on kelp fishery in Sitka Sound. STA's opposition arises from the potential conflict with the subsistence harvest of herring eggs and the proposal's omission of original commercial harvesters of roe on kelp in the Sound. Prior to the development of the current sac roe fishery, a commercial roe on kelp fishery existed within Sitka Sound. The fishery was closed due to concerns over its impact on the local kelp beds. Shortly after the closure the sac roe fishery was developed. STA asserts that the original commercial roe on kelp fishers have legal right to access any roe on kelp fishery that is developed on the Sitka Sound herring stock.

STA opposes proposal 216, which seeks to develop purse seine fishery on walleye pollock in Southeast Alaska. STA believes the development of this fishery is preemptive, that it will inevitably impact other fish stocks, and is outraged at its consideration outside of the mandated regulatory cycle. Since no test fishery has been conducted, there is no data to evaluate the impact of the fishery on the target species or non-target species that are important to other sport, subsistence, or commercial fisheries. Any by-catch associated with this fishery will have an impact on other users of that by catch. Finally, STA questions how a proposal that is specific to Southeast Alaska was allowed to be considered at the statewide meeting. This proposal was not submitted under an agenda change request for out of cycle consideration nor does it meet the established criteria for such a request. Current consideration of this proposal makes it appear that the regulations governing the submission of proposals are not being applied evenly to everyone.

In closing, Sitka Tribe would like to voice its support for proposals 209, 210, and 211. STA is opposed to proposal 124-2014-2015 and proposal 216. We hope you can include these comments in a productive discussion, and look forward to participating at the statewide meeting March 8-11.

Sincerely,



Michael Baines
Chairman
Sitka Tribe of Alaska



QAWALANGIN Tribe of Unalaska

RESOLUTION #16-08

A RESOLUTION OF THE QAWALANGIN TRIBE OF UNALASKA SUPPORTING THE ADOPTION OF UNALASKA NATIVE FISHERMANS ASSOCIATION'S (UNFA) PROPOSAL 194 TO THE BOARD OF FISHERIES, TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR, YEAR ROUND.

WHEREAS, the Qawalangin Tribal Council is a duly elected governing body of the federally recognized Qawalangin Tribe of Unalaska (Q. T.); and

WHEREAS, the UNFA has submitted proposal 194 to the Alaska Board of Fisheries; and

WHEREAS, this proposal would close Unalaska Bay year round to ground fish trawling with trawl gear from a point at south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. To Cape Cheerful at 54° 01' N lat., 166° 40' W. long.; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the local pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay; and

WHEREAS, the small skiff fleet, having to go outside the safety of Unalaska Bay is endangering their lives and lifestyles; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river system is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year; and


WHEREAS, Proposal 194 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport fishing activities in this area; and






NOW THEREFORE BE IT RESOLVED THAT; the Qawalangin Tribal Council strongly urges the Alaska Board of Fisheries to adopt Proposal 194, for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area.

We do certify, that the above Resolution was approved and passed at a Regular Meeting of the *Qawalangin* Tribal Council therefore called and held the 28 day of Jan., 2016, at which a quorum was present and resulted in a vote of 6 ayes, 0 nays, and 0 abstaining.


Thomas C. Robinson
President


E. Marie Schliebe
Secretary/ Treasurer

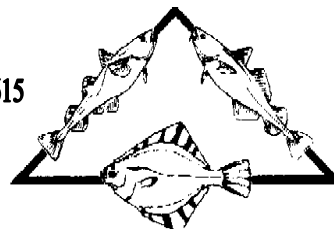


Groundfish Data Bank

Alaska

PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

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



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

Re: Proposals 215, 194, 218

Feb. 18, 2016

Dear Chairman Kluberton and Board Members,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and catcher vessels home ported in Kodiak that participate in the Central Gulf of Alaska (CGOA) groundfish trawl fisheries.

This letter expresses our opposition to proposals 218 and 215. We ask that the Alaska Board of Fish (BOF) reject these proposals.

PROPOSAL 218 – CREATE A STATE WATERS JIG POLLOCK FISHERY

Our members support entry level opportunities for jig fishermen. However, this proposal is misguided since efforts to catch pollock as a jigger has not happened either under the federal fishery structure or under the commissioner's permits within state fisheries. Additionally, the scope of the proposal suggests that the jig sector does not understand present opportunities under the federal system. For example in the Eastern GOA Pollock never closes so vessels can harvest as much pollock as they wish within the federal fisheries. In PWS and CI when a state-waters fishery is open for Pacific cod, all Pollock may be retained with jig gear. For Kodiak, a commissioner's permit was available that allowed the jig sector to direct harvest pollock yet there was very little catch. Our objection is a GHF set aside since once set aside this fish would be stranded and unavailable to the gear that can actual catch it.

Existing pollock jig harvesting opportunities: Directed pollock fishing is allowed now for jig gear within the federal management system. The jig sector is bound by the same rules as trawl and other fixed gear fishery participants (in most cases under both federal and state regulations). This includes seasonal opening and closure dates and Improved Retention Improved Utilization (IRIU) regulations that require harvesters - trawlers, jiggers, pot vessels and longliners - to keep all the pollock they catch (either 100% if open for directed fishing or the allowable MRA if on bycatch status). See 5 AAC 28.070 (e).

In the GOA, when directed fishing for pollock is open then it is open for *anybody in the inshore component*, as shown in the following regulation: (i) GOA pollock. The apportionment of pollock in all GOA regulatory areas for each seasonal allowance described in paragraph (a)(5)(iv) of this section will be allocated entirely to vessels harvesting pollock for processing by the inshore component in the GOA after subtraction of an amount that is projected by the Regional Administrator to be caught by, or



delivered to, the offshore component in the GOA incidental to directed fishing for other groundfish species. The only regulatory differences for vessels participating in the inshore component by gear types are the SSL haulout and rookery closures and the Jan 1 – Jan 20 and Nov 1 to Dec 31 prohibition on directed pollock (and cod) fishing using trawl gear; neither of these restrictions apply to jig pollock fishing.

The number of days per year that directed fishing for pollock using jig gear is open has been steadily increasing over the last few years (see Table 1 below). Last year, the jig fleet was able to target pollock for 238 days or 65% of the year. One of the options for Council’s Gulf Trawl Bycatch Management amendment package is to extend the Gulf pollock seasons so they run continuously from Jan 20 to Nov 1 – this change would allow jig pollock harvests all year in the GOA.

Table 1. Number of days 630 pollock open to directed fishery by jig gear, 2011-2015

Year	Days open	% of year
2015	238	65.2%
2014	210	57.5%
2013	130	35.6%
2012	92	25.2%
2011	65	17.8%
Average	147	40.3%

Table 2 show pollock catches by gear type for the years 2006 – 2015 for area 630 (Kodiak). On average over the last 10 years, the jig sector has harvested 9 mt (20,723 pounds) of pollock compared to an average pollock ABC of 24,361 mt (53,706,076 pounds).

Table 2. Area 630 (Kodiak area) Pollock quota and catch by gear type 2006-15

Year	630 Poll ABC/TAC	Harvest (mt)				Jig (lbs)	Total (mt)	Jig % of Total
		Trawl	HAL	Pot	Jig			
2006	18,762	16,985	85	7	1	2,205	17,078	0.01%
2007	14,850	14,320	136	15	7	15,432	14,478	0.05%
2008	13,640	14,221	150	12	2	4,409	14,385	0.01%
2009	10,931	12,091	123	8	10	22,046	12,232	0.08%
2010	19,118	18,988	156	10	2	4,409	19,156	0.01%
2011	20,235	19,676	50	9	7	15,432	19,742	0.04%
2012	26,348	25,798	89	12	9	19,842	25,908	0.03%
2013	27,373	29,834	101	12	17	37,479	29,964	0.06%
2014	39,756	42,323	135	26	12	26,455	42,496	0.03%
2015	52,594	52,477	102	38	27	59,525	52,644	0.05%
Avg	24,361	24,671	113	15	9	20,723	24,808	0.04%

When examining historic jig cod catch, actual retained pollock catch is well below what would be anticipated assuming that the allowable 20% MRA for pollock is representative of incidental catches within a jig target fishery and that jig gear is an effective gear type to harvest pollock. Table 3 below shows jig cod catches for the Kodiak area. The average catch for the period 2006 to 2015 is 1,928 mt of cod; applying the allowable pollock retention at the 20% MRA suggests that 386 mt of pollock on average could have been retained. This is an underestimate for allowed retention since the sector must



keep what they catch when the directed pollock fishery is open as well. Knowing that the jig sector is required to retain all pollock catches up to the allowable limits (either 100% or 20%) suggests pollock catches are either very low for the gear type or that the sector is discarding pollock catches at sea. The average catch of 10 mt or 22,046 pounds is a long way from 386 mt or 850,000 pounds of incidental catch allowances for pollock.

Table 3. Area 630 (Kodiak area) Jig cod catches (both federal and State) for the Kodiak area for the years 2006-15 and allowable retention amounts of pollock using cod catches as a basis for MRAs

Year	Kodiak Jig Cod GHL	Jig Fed Cod Quota ¹	Total Jig Cod Quota	Jig State Cod Catch**	Jig Fed Cod Harvest (CG)	Total Jig Cod Harvest	Total Potential Pollock harvest based on 20% MRA	Actual Retained Pollock Catch (NMFS)*	Diff
2006	2,363	na	2,363	656	96	752	150	1	149
2007	2,363	na	2,363	567	36	603	121	7	114
2008	2,368	na	2,368	926	49	975	195	2	193
2009	1,971	na	1,971	1,968	37	1,968	394	10	384
2010	3,064	na	3,064	2,922	103	3,025	605	2	603
2011	3,361	na	3,361	3,237	475	3,712	742	7	735
2012	3,556	427	3,983	3,584	403	3,987	797	9	788
2013	3,080	739	3,819	252	202	454	91	17	74
2014	3,319	797	4,115	1,426	262	1,688	338	17	321
2015	3,833	460	4,292	1,758	354	2,112	422	28	394
Avg MT	2,928	606	3,170	1,730	202	1,928	386	10	376
Avg LBS	6,454,580	1,335,118	6,988,627	3,813,153	444,672	4,249,668	849,934	22,046	827,887

*620/630 NMFS Areas; **KMA only; ¹Initial Annual quota

Conclusion: AGDB members believe there currently exists ample opportunity for the jig vessels to harvest pollock and the opportunity will increase should the Gulf pollock fisheries become rationalized through the Council process. In the meantime the commercial permit process should continue.

PROPOSAL 215 – ESTABLISH A 58’ OVERALL LENGTH LIMIT IN SOUTH ALASKA PENINSULA (SAP) FOR POLLOCK

Our members both under and over 58’ fish in the SAP area and have historical dependence on the pollock fishery. We disagree with the premise of this proposal that suggests that excluding the large vessels will assist in keeping bycatch to a minimum. Our experience is that vessel’s need to fish were pollock CPUE is high and bycatch is low. Creating a bright line could very well increase Chinook salmon bycatch since vessels many not be able to access lower bycatch fishing areas inside three and thus be forced to fish outside three increasing Chinook salmon bycatch. In addition it would be best to have the SAP fleet working together, both big and small vessels, which would result in better harvest coordination (hotspot notices) and sharing of excluder technologies and development. This proposal could in fact shut the fishery down since the Chinook salmon cap of 6,684 fish for the WGOA pollock fishery is for both the parallel and federal fishing zone and once the cap is hit the entire pollock fishery would be shut down for the year.

AGDB members respectfully request that the Board reject proposals 215 and 218. We appreciate the opportunity to comment and look forward to engaging with the Board at the upcoming Statewide Finfish and Supplemental Issues meeting in Anchorage.



Sincerely,

A handwritten signature in black ink that reads "Julie Bonney".

Julie Bonney
Executive Director
Alaska Groundfish Data Bank



Submitted By
Alan. Otness
Submitted On
2/14/2016 5:07:14 PM
Affiliation

Dear Sir:

i am writing in support of proposal 126.

I have been involved in the Sitka sacroe fishery since the start of the fishery.

I believe that allowing for open pounds in Sitka will benefit both the sac roe fishers and the existing herring pound fishermen. I think that with more herring roe on kelp product available the market will expand over time and will then benefit all herring roe product producers.

Sincerely,

Alan Otness



 **Alaska Longline**
FISHERMEN'S ASSOCIATION
Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

February 12, 2016

Dear Members of the Board,

The Alaska Longline Fishermen's Association (ALFA) strongly opposes Proposal 216 (5 AAC 28.1XX. Southeast Alaska Area Walleye Pollock Management Plan): Establish a state waters walleye pollock purse seine fishery in Southeast Alaska. Our opposition is based on the following facts and concerns.

Federal groundfish surveys establish that pollock abundance east of 140 degrees West longitude is significantly lower than Gulf of Alaska areas farther west.¹ Pollock are episodically available in Southeast Alaska, and when available small pollock are an important prey item for local fish species (cod and halibut) as well as marine mammals and seabirds.² Although not formally designated as such in Alaska, pollock are considered a forage fish due to the important role the species plays in energy transfer through marine trophic levels.³ Given the clear signs of food related ecosystem stress (e.g., massive Gulf of Alaska Common Murre deaths, decreasing size at age of halibut), no proposal that increases pressure on prey species should be considered. The uncertainty added by climate change argues for more rather than less conservative management. On that basis alone, this proposal should be dropped.

As the Board is aware, experimental purse seine fisheries for pollock are ongoing in the Gulf of Alaska. The results from Kodiak, Chignik and Cook Inlet show low catch rates and poor markets. These experimental fisheries yielded IN TOTAL just over 65,000 pounds, far less than the 200,000-pound trip limit requested in proposal 216. Commissioner's permits to purse seine and jig for pollock in Southeast have also been issued. Although results from the Southeast test fishery are not yet publically available, ADFG staff indicate that the one seine set made to date yielded more herring than pollock (pers. comm). In the Central Gulf, ADFG staff concluded there was little rationale for incurring the costs associated with the experimental fisheries. Given the current fiscal crisis and the budget shortfalls that limit the Department's ability to survey stocks currently important to resident fishermen, there is no defensible rationale for opening a questionable new fishery, particularly prior to reviewing results from the experimental fishery.

Key bycatch in the pollock fishery is salmon, herring, crab, and halibut. All these species are important to our membership and other Southeast fishermen. Both halibut and crab stocks

¹ <https://www.afsc.noaa.gov/REFM/Docs/2014/GOApollock.pdf>. Appendix A

² <http://www.fws.gov/alaska/mbsp/mbm/seabirds/pdf/comu.pdf>

³ http://alaska.usgs.gov/science/biology/seabirds_foragefish/foragefish/index.php#



are at low levels and therefore vulnerable to additional pressure. Again, there is no defensible rationale for increasing bycatch of locally important species in order to initiate a new fishery on a low value and low abundance species.

In a related research proposal, proponents have stated that pollock predation on hatchery smolt creates the need to harvest pollock. This leads to somewhat difficult to answer questions: should management target removal of wild fish to protect hatchery-raised fish? Since humpback whales are also dining on hatchery released fish, should whales be targeted as well? Hatcheries provide a welcome source of economic opportunity in Alaska, but were never intended to take priority over wild stocks or natural ecosystems. Our organizations would caution against changing this strategy.

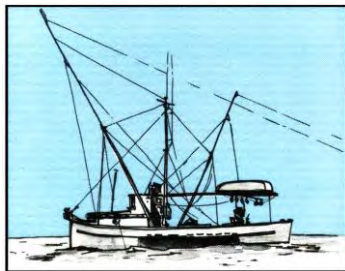
In sum, ALFA considers Proposal 216 to be ill conceived and even more ill timed. If the test fisheries or other studies reverse existing scientific conclusions relative to the low abundance of Pollock in Southeast or the ecosystem importance of small pollock as forage fish, then the Board might want to reconsider this proposal. Until that time, we ask that you vote down this proposal.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Linda Behnken".

Linda Behnken
(Executive Director, ALFA)



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907)586-9400 phone
(907) 586-4473 fax
ata@gci.net

February 18, 2016

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

Dear Board of Fisheries Members:

The Alaska Trollers Association (ATA) opposes proposal 216, which seeks to establish a state waters walleye Pollock purse seine fishery in Southeast Alaska. While ATA encourages the state to seek new commercial fishing opportunities, and understands that there are too few options, we think Proposal 216 is premature. A secondary concern is that the proposal is being taken up at the statewide meeting, as opposed to during the regular Board of Fisheries cycle in the affected region.

ATA represents a fleet of commercial hook and line salmon fishermen who deliver fine quality salmon harvested in state and federal waters between Dixon Entrance and Cape Suckling. There are about 1,800 troll permits and nearly half are fished each year. Troll fishery management plans are designed to conserve coho and Chinook salmon, some that are subject to provisions of the Pacific Salmon Treaty. As such, we are concerned about any new impacts on local and transiting salmon stocks. It is unclear at this time what, if any, impact a Pollock seine fishery might have in our region, particularly on Chinook salmon.

ADFG issued two permits for an experimental Pollock fishery to be conducted October 2015 to March 2016. Data and observations from these operations will provide important information relative to impacts on other species and fisheries. Please note that these permits will be utilized during key portions of the winter troll fishery for Chinook salmon.

We fail to see a pressing need for rushing to approve a Southeast Pollock seine management plan. ADFG has the option to renew the experimental permits on a year to year basis, and there is little to no information available to evaluate the ramifications of establishing this new fishery on the resource or existing user groups.

For the above reasons ATA requests the Board of Fisheries take no action on Proposal 216.

If I can answer additional questions about ATA's position on this matter, please don't hesitate to contact me at the number above.

Respectfully,

A handwritten signature in cursive script that reads "Dale Kelley".

Dale Kelley
Executive Director



Submitted By
bill connor
Submitted On
12/4/2015 7:23:33 AM
Affiliation

I would support proposal 212.

with the market for salmon at depressed price levels commercial fishermen need more opportunity to work, allowing commercial fishing to remain a viable career.

an average gross stock for Southeast salmon seine was about 120,000 dollars. there are 4 to 5 crew to pay, fuel, groceries, boat maintenance, boat and crew insurance. this does not leave much left for either boat owner or crew to live on.

bristol bay might have an average gross this year of 50,000.00

by allowing proposal 212 it will allow for longer fishing seasons giving commercial fishermen a real career and keeping professional crew employed with real wage earning potential to keep families out of poverty and advancing in life's economic opportunity. it will also allow for stability in our small community's economics.



Feb. 15, 2016

Board Members,

My name is William R Menish and I support proposal 126. I have been a GO1A permit holder since the beginning of the limited entry fishery. Over 10 years ago I bought into the northern herring closed pound fishery and fished with a group until the fishery was closed because of a lack of biomass. I feel we, as the fishermen, had a part in the lack of biomass as, in my opinion, closed pounding is not the green fishery it's talked up to be. Going to an open pound fishery in Sitka as an option under proposal 126 would be truly a step in the right direction on a green fishery as in open pounding the fish are totally left alone to spawn and swim away. Please take into consideration while making a decision on 126 not just marketing issues but the chance to make a well managed GO1A fishery even better by taking a part of our biomass and having it swim away live. I thank you for taking the time to give this some thought.

A handwritten signature in cursive script that reads "Bill Menish".

Bill Menish

Oct 13 2015 10:26

HP LASERJET FAX

907-224-338

PC 10
1 of 1

RECEIVED

OCT 13 2015

BOARDS
ANCHORAGE

To the members of the
Seward Fish & Game advisory
committee

RE: Proposal 203 10/13/15

I am writing to urge your
strong opposition to any
proposal brought forth by
CIAA or any other entity
that will further limit or
curtail access to Resurrection
Bay Red Salmon by residents
of the Seward Area.

Thank You

Bill Perdue
Seward

Requested this be forwarded and included in BOF
Public Comments for Statewide BOF March 2016 mtg.

February 18, 2016

Mr. Tom Kluberton, Chairman
Mr. John Jensen, Vice Chairman
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 209 – 5 AAC 39.212. Forage Fish Management Plan. Designate Pacific herring as a forage fish

Dear Chairman Kluberton, Vice Chairman Jensen, and Board Members:

Thank you for again considering adding Pacific herring (Family *Clupeidae*) to the State of Alaska's Forage Fish Management Plan. We are fully in support of the proposal. Pacific herring are one of the most important forage fish species in Alaska, and clearly should be designated as 'forage fish' and included in the Forage Fish Management Plan.

The Alaska Board of Fisheries had great foresight when it created a Forage Fish Management Plan in 1999 to mirror actions taken in federal waters¹. The Board recognized that abundant populations of forage fish perform a critical function in the ecosystem and are necessary to sustain populations of commercially important fish species, marine mammals, and seabirds².

Now, 17 years later, Proposal 209 presents the Board with an opportunity to fix an obvious oversight and include Pacific herring in the list of species in the Forage Fish Management Plan.

¹ In 1998 the NPFMC amended the Bering Sea/ Aleutian Islands and Gulf of Alaska Groundfish federal fishery management plans to prohibit directed fishing in federal waters for forage fish.

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The board finds that forage fish perform a critical role in the complex marine ecosystem by providing the transfer of energy from the primary and secondary producers to higher trophic levels. The higher trophic levels include many commercially important fish and shellfish species. Forage fish also serve as important prey species for marine mammals and seabirds.

The board finds that abundant populations of forage fish are necessary to sustain healthy populations of commercially important species of salmon, groundfish, halibut, and shellfish.

5 Alaska Admin. Code § 39.212 (b)-(c).



Formal recognition of Pacific herring in the Forage Fish Management Plan would give important context for management decisions affecting Pacific herring stocks. This action would not adversely affect any existing stakeholder; inclusion in the Forage Fish Management Plan will not preclude commercial harvests for herring because current statutory exemptions allow for Pacific herring commercial fisheries. The Board would continue to evaluate herring management proposals and take action on the merits of individual proposals.

Forage fish are vital links in the food chain and play an essential role in maintaining ecosystem health. By sustaining other commercially valuable species and fisheries, these fish have an economic value many times the value of their directed harvest³. In Alaska, herring provide a key link between trophic levels, consuming small zooplankton and transferring energy to upper trophic levels. Pacific herring are a vital component of the diets of Chinook and coho salmon, halibut, bald eagles, whales and many other species⁴. Herring eggs gathered during the spawning spectacle are one of the most culturally important subsistence foods for Alaskan communities in the spring.

The Forage Fish Management Plan should be modified in the Alaska Administrative Code at 5 AAC § 39.212 to include a tenth category for Family *Clupeidea* (herring) in the list of forage species:

1. Family *Osmeridae* (eulachon, capelin, and other smelts),
2. Family *Myctophidae* (lanternfishes),
3. Family *Bathylagidae* (deep-sea smelts),
4. Family *Ammodytidae* (Pacific sand lance),
5. Family *Trichodontidae* (Pacific sandfish),
6. Family *Pholidae* (gunnells),
7. Family *Stichaeidae* (pricklebacks, warbonnets, eelblennys, cockscombs and shannys),
8. Family *Gonostomatidae* (bristlemouths, lightfishes, and anglemouths),
9. Order Euphausiacea (krill),
- 10. and Family *Clupeidea* (herring).**

Oceana is an ocean conservation organization that works with decision-makers in Alaska and all over the world to protect our ocean ecosystems while maintaining long-term sustainable

³ Pikitch, E. K., Rountos, K. J., Essington, T. E., Santora, C., Pauly, D., Watson, R., Sumaila, U. R., Boersma, P. D., Boyd, I. L., Conover, D. O., Cury, P., Heppell, S. S., Houde, E. D., Mangel, M., Plagányi, É., Sainsbury, K., Steneck, R. S., Geers, T. M., Gownaris, N. and Munch, S. B. (2012), The global contribution of forage fish to marine fisheries and ecosystems. *Fish and Fisheries*. doi: 10.1111/faf.12004

⁴ Aydin, K., S. Gaichas, I. Ortiz, D. Kinzey, and N. Friday. 2007. A Comparison of the Bering Sea, Gulf of Alaska, and Aleutian Islands Large Marine Ecosystems Through Food Web Modeling. NOAA Technical Memorandum NMFS-AFSC-178

Chair Kluberton
Vice Chair Jensen
February 18, 2016
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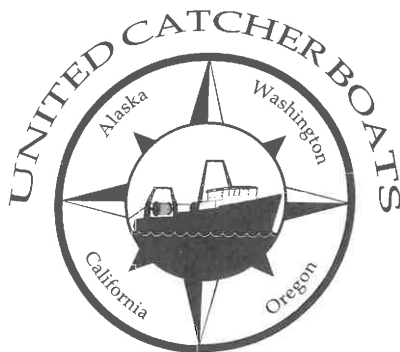
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fisheries. More than 1,500 Alaskans are members of Oceana. Thank you for considering Proposal 209 to add Pacific herring (Family *Clupeidea*) to the Forage Fish Management Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Warrenchuk".

Jon Warrenchuk
Senior Scientist and Campaign Manager
Oceana



Alaska Department of Fish and Game
Board Support
P. O. Box 115526
Juneau, Alaska 99811

February 18, 2016

RE: Proposal 194, Closure of Unalaska Bay

Dear Board of Fisheries Members,

Please consider these comments from the members of United Catcher Boats. We ask that you **do not support** Proposal 194, the complete closure of Unalaska Bay to trawling for Pollock. Adoption of Proposal 194 would unfairly impact the catcher vessel trawl fleet by further closing Unalaska Bay to Pollock fishing and thereby reduce our fishing opportunities. The Board of Fisheries has acted on this same proposal now twice, once at your February 2010 meeting (Proposal 111), and again at your February 2013 meeting (Proposal 162). The compromise action (on Proposal 111) adopted by the Alaska Board of Fisheries six years ago in February 2010 and again in at your February 2013 meeting was reasonable and addressed the concerns raised by subsistence, sport, and non-trawl harvesters. We believe the Board of fisheries' action in 2010 created a 'win-win' solution for both the local pollock trawl fleet and the local recreational and subsistence users, and no additional closures are needed in Unalaska Bay. We ask the Board to continue its support of the February 2010 compromise, and take no further action.

The compromise action adopted provides a closure of the entire Unalaska Bay for at a minimum of 10 months out of the year, from November 1 through August 31. Pollock fishing is allowed only in the outer portion of Unalaska Bay (outside of a line drawn between Priest Rock and Broad Bay) from September 1 until the closure of the federal Inshore Pollock fishery, or October 31. As the Pollock B season fishery typically ends around the end of September, the pollock catcher vessel fleet harvests pollock in the outer portion of Unalaska Bay for about one month out of the year. Again, the Pollock fleet is prohibited from fishing in the inner portion of Unalaska Bay at all times of the year. UCB supported this compromise as did the representatives of the Unalaska community, and the Board of Fisheries passed the compromise on a unanimous vote. The Dutch Harbor ADF&G Advisory Panel, at their most recent meeting, unanimously reaffirmed their support for this compromise and does not support Proposal 194.

United Catcher Boats is a trawl catcher vessel trade association made up of the owners of 68 vessels that participate in the Bering Sea/Aleutian Islands (BSAI) trawl fisheries. Our members fish for Pollock



and Pacific Cod in the BSAI trawl fishery and are primarily home-ported out of Dutch Harbor and Akutan. We deliver our catch to the plants in Dutch Harbor (UniSea, Westward Seafoods and Alyeska Seafoods), Akutan (Trident Seafoods), Beaver Inlet (Icicle Seafoods), and King Cove (Peter Pan Seafoods), as well as to three offshore Pollock Mothership markets. The closure of Unalaska Bay to trawling for Pollock would have a negative impact on our fishing opportunities.

Upon review of the stated reasons presented in Proposal 194, we offer the following comments for your consideration. We fail to see any real or definable reason for the Board of Fisheries to enact a year round closure to the entire Unalaska Bay. The proposers provide no evidence that the harvest of pollock in the outer portion of Unalaska Bay negatively impacts other living resources in the Bay and no evidence that there are negative impacts to the subsistence and recreational harvests of salmon, crab and halibut by local Dutch Harbor residents.

Salmon Bycatch: The Bering Sea Pollock fleet has worked very hard addressing the issue of salmon bycatch. Since 2010 the fleet operates under a Chinook Salmon Savings Incentive Plan (SSIP) that was developed with the NPFMC’s Chinook salmon hard cap management program for the BSAI Pollock fleet. Each catcher vessel is limited to a share of the Chinook hard cap and through the SIPP they have incentives to avoid or reduce unwanted harvest of Chinook salmon. This program has proven to be a success.

Relative to salmon harvest within Unalaska Bay, the following table (source: SeaState, Inc., using Federal observer data) provides the number of Chinook and chum salmon taken as bycatch by the Pollock fleet since the 2010 Board of Fisheries compromise went into effect. Note that every vessel fishing Pollock is required to carry a federal observer 100% of the time so the data presented represents observed catches.

<u>Year</u>	<u>Deliveries</u>	<u>Pollock (mt)</u>	<u>Chinook (number)</u>	<u>Chum (number)</u>
2012	8	443	100	742
2011	16	1061	17	173
2010	18	1752	12	581

The Pollock fleet also uses a Rolling Hot Spot Closure program for both Chinook and chum salmon to help reduce and manage bycatch. This federal regulation allows the Pollock co-op managers to close, on a weekly basis, discrete areas with known high bycatch rates (“hotspots”). Over the past couple of years this bycatch management tool has become quite effective in reducing salmon bycatch in the Bering Sea Pollock fishery. If salmon bycatch rates in the Unalaska Bay fishery are shown to be above average, then the co-op managers designate this area as a “Hotspot” and close it to vessels that have high bycatch rates, on a weekly basis. Since 2010 the Pollock coops have implemented three closures in Unalaska Bay under the Hotspot Closure program as follows: Aug. 10-20, 2010; non closures in 2011; Aug. 7-14, 2012; and Sept. 14-18, 2012. These closures were voluntary and were above and beyond what was adopted by the Board of Fisheries in 2010.

The closure of Unalaska Bay as proposed in Proposal 194 will result in extending the pollock fishery later into the season. Extending the season concerns us because Chinook appear in greater numbers on the Pollock grounds as the year progresses into the fall months, thereby increasing the chances for higher bycatch rates. A situation we clearly want to avoid. Closure of the Bay will also have the effect of forcing the pollock fleet to not be able to fish in all possible areas of known low salmon bycatch



encounters. The fleet will not fish in the Bay if they experience high salmon bycatch rates but might choose to fish in the Bay if the salmon bycatch rates are low.

In addition, the pollock fleet encounters only Chinook and chum salmon, not sockeye, pink or silver salmon, the species of importance for the sport and subsistence users of Unalaska Bay. The two anadromous rivers that flow into Unalaska Bay are sockeye, silver and pink producing rivers.

Habitat Impacts Benthic habitat destruction is not occurring in Unalaska Bay by the pollock catcher vessels using mid-water trawls to harvest Pollock. Due to the rough and high relief bottom substrate, the Pollock fishery in Unalaska Bay is a true pelagic fishery. There is a huge disincentive to have a net come in contact with the seafloor where there are many rough hazards that can damage and destroy the nets, particularly in the area in question. The average price of a Pollock mid-water net is over \$100,000.

Loss of Local Halibut Catch Supporters of Proposal 194 state that the reduction in the catch of halibut by the local sport and subsistence users is a result of the trawl activity by the Pollock fleet. There is no documented evidence or proof that the vessels fishing for Pollock in Unalaska Bay have had any impact on the halibut population in Unalaska Bay. ADF&G data show little to no halibut taken as bycatch in the Pollock fishery.

Gear Conflicts and Vessel Safety There is no data or any documented report of pot or longline gear loss due to Pollock fishing occurring in Unalaska Bay. Normally, when a trawl net comes in contact with a crab pot, there is a complaint filed with the ADF&G or NMFS offices in Dutch Harbor. Over the past decade, the Bering Sea Pollock trawl and pot fleets have worked together to develop a protocol agreement that has successfully minimized gear and grounds conflicts. Given the thousands of vessel trips that enter and exit Dutch Harbor by the groundfish trawl, pot and longline vessels throughout the year, it is hard to believe that any loss of hook & line and pot gear is due to the few Pollock vessels fishing in the Bay in the late summer months. There also is no evidence that the Pollock trawlers fishing in the outer portion of Unalaska in the month of September have caused the smaller boats to be forced out of the protective waters of the Bay and to areas that are unsafe. Again, we cannot fish in the summer months when the local boats are participating in their subsistence and sport fishing, and we do not fish in the inner portion of the Bay.

Continued Influx of Large Trawlers The trawl vessels harvesting Pollock in Unalaska Bay are the smaller sized vessels (relative to the entire Bering Sea Pollock catcher vessel fleet). The size and shape of the fishing area in Unalaska Bay is better suited for these smaller-size vessels (105' to 125' in length).

We are very concerned about the cumulative loss of fishing grounds over time. Over the past twenty years, the BSAI trawl fleet has seen a continuum of time and area closures to fishing in the form to Stellar Sea Lion Critical Habitat, Essential Fish Habitat (EFH), Habitat Areas of Particular Concern (HAPC), and ecosystem management measures. It is our belief that the rationale for the closure in Proposal 194 is without merit. We believe trawling for Pollock, as it is currently allowed in Unalaska Bay, should be permitted to continue.

We cannot simply make up for this loss of area by fishing somewhere else. Unalaska Bay provides fishermen and processing plants the size and quality of fish that are optimal for fillet product forms rather than surimi product forms. They also have a significantly less run time back to the processing plant from the fishing grounds thereby increasing product quality.



In addition, the waters of Unalaska Bay provide a safe area to operate for the smaller Bering Sea Pollock fleet. At times of very severe weather conditions the smaller vessels cannot venture out onto the Eastern Bering Sea Shelf.

If the Board of Fisheries is interested in taking measures to protect the waters and fishery resources of Unalaska Bay, we ask that you request the ADF&G provide you with data that show the current amount of removals of salmon and groundfish by all users of the Bay (sport, subsistence and commercial) in order to develop a baseline trend. We also ask you direct ADF&G to initiate habitat impact studies to determine impacts to the Unalaska Bay habitat, and if so, the possible causes of this impact.

In summary, we ask for your continued support of the compromise action adopted in 2010, reaffirmed in 2013, and take no action on Proposal 194.

Sincerely,

A handwritten signature in cursive script that reads "Brent C. Paine".

Brent Paine
Executive Director
United Catcher Boats



Phone: 907-283-5761
Fax: 907-283-9433
info@ciaanet.org
www.ciaanet.org

February 17, 2016

Tom Kluberton, Chairman
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: Support for Proposal 203

Dear Chairman Kluberton and Board Members,

Cook Inlet Aquaculture Association (CIAA) submits this letter in support for Board of Fisheries Proposal 203.

Within the Cook Inlet drainage CIAA operates three hatcheries: Trail Lakes Hatchery, Tutka Bay Lagoon Hatchery and Port Graham Hatchery. These hatcheries provide sockeye and pink salmon to enhance commercial, sport, subsistence and personal use fisheries in Cook Inlet. Additionally, CIAA provides coho salmon primarily for the benefit of sport and personal use fisheries.

The key to continued operations is the return of sufficient adult salmon to meet escapement, broodstock, and cost recovery goals. This proposal would provide the tools necessary for the Alaska Department of Fish and Game to manage both the commercial and sport fisheries in a similar and consistent manner. Through the use of emergency orders to open and close the two fisheries within the special harvest areas, the adult returns can be effectively managed to ensure the continuance of the enhancement programs by meeting escapement, broodstock and cost recovery goals. By achieving these goals, the enhancement programs will continue to thrive providing harvest opportunities for commercial, subsistence, sport and personal use fisheries.

Thank you for your attention to this matter.

Sincerely,

Gary Fandrei,
Executive Director



Alaska Department of Fish and Game
Board of Fisheries Support Section
Glenn Height, Executive Director

RE: Support Documents for Proposal 126 resubmitted for Statewide March 2016 meeting record.

February 1, 2016

SOK in Sitka Sound was first proposed to the Board in 1996. Currently, issues regarding resource conservation and subsistence needs have come to the forefront and the economies of the fishery have been in decline. The sac roe product is no longer in high demand. Diversifying the fishery with SOK as an alternative harvest method would address many of the concerns surrounding the fishery while improving the overall value of the fishery.

In 1998 and 1999 an experimental open pound spawn on kelp (SOK) fishery was conducted in Sitka Sound. Some documents included in this PC have been submitted at past meetings and there are new materials as well. Much time has passed since the experimental fishery but the data, studies, and reports produced are still relevant. The market for herring roe products has not changed much from the time these documents were produced. A finite market for existing herring roe products still remains but expansion is possible with the addition of the thinner product that would be produced with SOK.

This PC contains the following documents:

- Spawn on Kelp and the Sitka Sound Herring Fishery.
- ADFG Report to the Board re: 1998-99 Experimental spawn on kelp fishery in Sitka Sound.
- Assessment of Macrocystis Biomass, Quality, and Harvesting Effects in Relation to Herring Roe on Kelp Fisheries in Alaska.
- Open Pounds and the Traditional Subsistence Fishery.
- An Update of Market Variables Affecting Demand in Japan.
- ROK Marketing Questions and Answers.
- Letter from Elderwood Trading regarding SOK in Sitka Sound.

The markets for Sitka Sound SOK are not the markets for thick SOK, but for a thinner product at a lower price point with a perceived value which can be more easily consumed in the marketplace. The existing market for SOK is hampered by large fluctuations in volume which have limited market expansion. SOK production in Sitka Sound would ease fluctuations in overall supply giving distributors the opportunity to expand the market, generate more awareness of the product, and increase demand for the product. Increased demand leads to higher prices. This will not happen overnight but it is time for a departure from status quo. SOK in Sitka Sound is a step in the right direction.

Respectfully Submitted,

Ryan Kapp



Spawn On Kelp and the Sitka Sound Herring Fishery

Allowing an Open Pound Spawn on Kelp (SOK) fishery in Sitka Sound will increase the overall value of the fishery while killing less fish than the existing harvest method.

The biology of spawning herring is a big factor in producing more value from the same biomass.

Currently, herring harvest can begin when roe recovery is sampled at 10% roe weight. Put simply: 100 tons of fish equals 10 tons of eggs. In some Sitka Sound openings roe recovery has been as high as 13%. In an experimental SOK fishery conducted in Sitka Sound in 1998 and 1999, Alaska Department of Fish and Game determined that 100 tons of herring biomass harvested with SOK converts into 27 tons of product. This represents a recovery of 27% which more than doubles the existing fishery recovery.

The reason for this increase in weight is biological. Upon fertilization the herring egg hydrates with water increasing the weight of the egg. SOK eggs are spawned, fertilized eggs that are hydrated while seine caught sac roe are pre spawn eggs and not hydrated. Because of this hydration the weight of an individual egg produced with SOK is more than twice as heavy as an individual sac roe egg.

With SOK the value of the eggs is increased as well. For example: 100 tons of herring at current prices (optimistically figure \$200 per ton) is worth \$20,000. That same 100 tons of herring harvested with SOK equates to 27 tons of product or, for simple math, a little over 50,000lbs. 50,000lbs of product sold at current prices (realistically figure \$5 per pound) is worth \$250,000. In this scenario the SOK product is worth more than 12 times the value of the traditional sac roe product.

While harvesting with SOK increases the value of the fishery product the best part is with Open Pound SOK no herring are killed. An Open Pound SOK fishery means the herring can swim into and out of the kelp as they please. There are no nets used at any time. The fish swim in, spawn, and return to sea making them available to spawn again in the future.

Increasing the value of the resource while causing the resource less harm is a win / win scenario. Incorporating Open Pound SOK into the Sitka Herring fishery would be a benefit both now and well into the future.

**Sitka Sound Herring Spawn on Kelp
Open Harvest Platform
Experimental Fishery Report
Spring 1998**



Submitted to
Alaska Department of Fish and Game
Commercial Fisheries Division
ADF&G Contract No. 11-122-98

Submitted by
Paul Gronholdt and Associates
P.O. Box 288
Sand Point, Alaska 99661

Prepared by
Oceanus Alaska
119 Seward Street, Suite 9
Juneau, Alaska 99801



Sitka Sound Roe on Kelp Experimental Fishery Report
Paul Gronholdt and Associates March 1998

EXECUTIVE SUMMARY

In response to a call for change in the Sitka Sound herring fishery, the Board of Fisheries prompted the Alaska Department of Fish and Game to conduct an experimental fishery using the Open Harvest Platform roe on kelp gear alternative. The goals of exploring diversification of the fishery were to improve conservation and encourage greater economic yield to participants.

Paul Gronholdt and Associates carried out the Experimental Fishery in accordance with contract specifications outlined by the Alaska Department of Fish and Game. The team's experience, good weather and an excellent herring return contributed to PGA's attainment of the goals of the experimental fishery.

The PGA team worked in concert with ADF&G research staff to support sampling efforts and generally track the fishery. PGA maintained communications with ADF&G staff from March 15 through the consummation of final product sales in Japan in the late summer.

This report provides a narrative describing procedures and schedules involved in the execution of the experimental fishery. Additional documentation on the harvest details is provided as attachments to this report.

MACROCYSTIS KELP HARVEST

About five tons of *Macrocystis* fronds were harvested from a single kelp bed along the north shore of Heceta Island, Sea Otter Sound. ADF&G reports that this included an estimated 4,080 fronds, each bearing an average of 16 blades. Thus, an estimated 65,280 total blades were "fished" as spawning substrate.

OPEN HARVEST PLATFORM FISHING

About 47 fishermen, consultants and processing crew were directly involved in the fishery. Four platforms were fished in Sitka Sound for two to four days each. Excellent spawn coverage was achieved. They carried out kelp gathering, rack loading, fishing and harvesting from March 16 through the 25th. Processing continued for an additional 2-1/2 weeks.

HERRING UTILIZATION

An estimated 104 tons of herring provided spawn for the final product harvested in the experimental fishery. 6,900 tons of herring were taken in the traditional sac roe fishery.

PROCESSING AND MARKETING

The total yield of this effort was 57,038 pounds of "Kazunoko kombu", which sold for 261,538 USD. 74% of the product was graded as #1 or #2, and the average price was \$5.46 per pound. Grade 5 fetched \$0.45 per pound, and Grade 1 paid \$7.58 per pound.



**Sitka Sound Roe on Kelp Experimental Fishery Report
Paul Gronholdt and Associates March 1998**

Fine silt found in the spawn layers made processing very difficult. Half of the product required light-table examination and special cleaning. Quality was impacted considerably, and the final price paid for the product reflected this problem. Experts feel that Sitka Sound resources and the level of local fishery sophistication can be focused to meet the stringent standards of an emerging Japanese market in the coming years.

SUBSISTENCE INTERACTIONS

PGA coordinated fishery logistics through their Sitka Tribe subsistence liaison, Mike Miller. The Sitka Tribe's attorney, Tribal biologist, Miller and other tribal leaders indicated that none of the conflicts that Tribal members had anticipated transpired during the experimental fishery.

ENVIRONMENTAL AND CONSERVATION MERITS

The environmental and conservation merits of this fishery were demonstrated in 1998. The fishery appeared to leave minimal impact to the kelp bed or Sitka Sound ecosystem. PGA's observations indicate that neither the kelp nor herring involved in the fishery were killed. This sublethal harvesting method has clear conservation benefits for both of these resources.

ECONOMIC BENEFITS TO SITKA

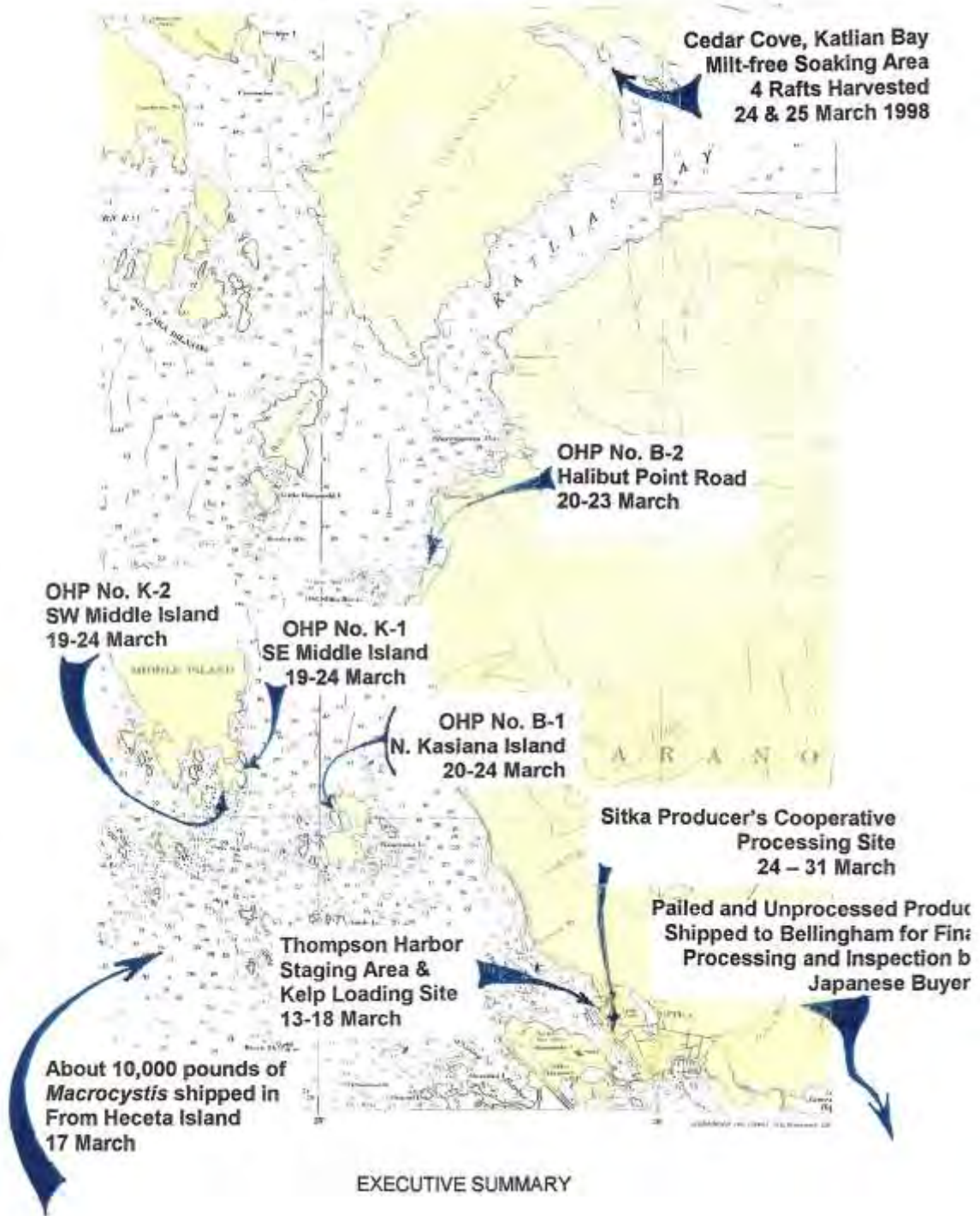
The Sitka community derived economic benefits from the fishery through short-term jobs and the direct purchases of goods and services. Raw fish taxes and city sales tax paid on local goods also contributed to the community's springtime economy.

WHAT'S NEXT?

The collective benefits of the open harvest platform method were largely realized in the 1998 experimental fishery. Fishery resource conservation merits were demonstrated, subsistence and other fisheries proceeded without disruption, and the roe on kelp produced was of acceptable quality. The funds generated in the fishery covered ADF&G management costs and offset most of PGA's expenditures.

Paul Gronholdt and Associates is satisfied with the overall outcome of the fishery. The PGA team feels that lessons learned in 1998 can contribute to a strategy of refining production standards for Sitka Sound roe on kelp which will lead to greater market niche security in the future.

Sitka Sound Herring Roe on Kelp Experimental Fishery
Open Harvest Platform Method
Paul Gronholdt and Associates March 1998





**Sitka Sound Herring Spawn on Kelp
Open Harvest Platform Method
Report on Experimental Fishery Results
1998 Season**

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Executive Summary

1.0 Introduction and Background

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2.0 Results of the 1998 Test Fishery

2.1 Staging for the Test Fishery

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2.3 Open platform fishing – spawn deposition

2.4 Roe on Kelp Harvesting

2.5 Roe on Kelp Processing

2.6 Product Quality Assessment and Marketing

3.0 Subsistence Fishery Interactions

4.0 Environmental Considerations

5.0 Economic Review

Discussion and Final Remarks

Attachments

- A. Board of Fisheries Proposal Number 441
- B. Sitka Spawn on Kelp Test Fishery Team Members (PGA) and Contractors
- C. PGA Kelp Harvesting Permit and Kelp Harvest Logs
- D. Detailed Chronology of Test Fishery (Field Records)
- E. March 1998 Interim report: individual rack logistics
- F. Sitka Producers Cooperative Tote Record and ADF&G Fish Tickets
- G. Roe on Kelp Production Report, Kanaway Seafoods
- H. Sitka Tribe of Alaska letter to the Board of Fisheries
- I. ACR 16, submitted to the BOF by Alan Ottness 25 September 1998



Sitka Sound Herring Spawn on Kelp Experimental Fishery Report
Paul Gronholdt and Associates March 1998

Section 1. Introduction and Background

This report describes the methods used by Paul Gronholdt and Associates in conducting the Sitka Sound Herring Spawn on Kelp Experimental Fishery. The results of the 1998 fishery and some of the challenges encountered in adapting the Open Harvest Platform fishery technique and marketing strategy to Sitka Sound are discussed.

Background

The Sitka Sound herring fishery has allowed only sac roe seine gear since entry to the fishery was limited in about 1977. Along the West Coast of North America, this singular gear type management regime for herring harvest is unique to Sitka (Garza 1996). In accordance with the Limited Entry Act optimum number provision, the CFEC established the maximum number of participants in the Sitka sac roe fishery at about 50 permits.

1.1 Diversification of the Herring Fishery

In early 1998, about one third of the Sitka Sound sac roe seine permit holders organized an effort to support the development of a spawn on kelp alternative to the Sitka Sound sac roe herring fishery. Under the leadership of a native of Sand Point, Paul Gronholdt and Associates submitted BOF Proposal No. 441. The proposal sought to "Allow Sitka Sound herring sac roe purse seine permit holders the option of using open pound racks to harvest herring roe in the form of kelp in lieu of or in addition to using purse seines."

Purse seine permit holders in the group, contracted biologists and consultants went before the Board of Fisheries in support of proposal No. 441 in Sitka (January 1998).

The Board of Fisheries took no action on proposal 441, but acknowledged the potential conservation and economic benefits of the gear type. In order to explore several aspects of the proposed open harvest platform method, the Board requested that the Alaska Department of Fish and Game conduct an experimental fishery. ADF&G responded by designing an experimental fishery and soliciting bids for the 1998 season.

1.2 Experimental Fishery Terms

Terms established by the Department for conducting the experimental fishery required that the contractor deposit a \$64,000 bond with the department, have at least two years experience in the spawn on kelp fishery, and have an appropriate vessel, platforms and other equipment necessary for achieving the test fishery goals. To further ensure a successful outcome, the Department also required that the contractors provide a harvest, marketing and processing plan, and hold a letter of agreement with a licensed Alaskan seafood processor for handling the roe on kelp product.

The goals of the test fishery were to first produce a sufficient quantity and quality of roe on kelp from four rafts to generate \$336,000 in product sales to pay department and contractor's expenses. The project would serve as an opportunity for ADF&G to conduct resource research on both kelp and herring, as well as observe the fishery for environmental impacts, gear conflicts and subsistence interactions.



**Sitka Sound Herring Spawn on Kelp Experimental Fishery Report
Paul Gronholdt and Associates March 1998**

Paul Gronholdt and Associates were awarded the test fishery contract on February 25, 1998. Comprised of 13 Sitka Sound herring sac roe permit holders, about 40 crewmembers, and five consultants, the "PGA team" commenced with mobilizing their vessels and open harvest platforms for the fishery in early March.





Sitka Sound Herring Roe on Kelp Experimental Fishery Report
Paul Gronholdt and Associates March 1998

Section 2.0 Results of the 1998 Experimental Fishery

From early March through mid-July, Paul Gronholdt and Associates carried out the experimental fishery, processing and marketing of roe on kelp as described in their contract with the Alaska Department of Fish and Game. The results of this coordinated effort were beneficial economically as well as informative to community members, the experimental fishing team and the ADF&G research and management staff.

The PGA team successfully transferred California OHP fishing technology to Sitka Sound, and adapted the method to Alaskan conditions. Sitka residents were able to observe the entire process and learn directly the logistics involved and impacts resulting from the alternative gear system. ADF&G researchers implemented their research plan with few changes, and obtained data upon which to base their analysis of the fishery.

Finally, the overall quantity and quality of the roe on kelp yielded by this fishery were very good, considering it was a first attempt at the fishery in Alaska. Sales of the product were sufficient to reimburse most of the PGA team's costs, and covered the entire ADF&G experimental fishery research budget.

Detailed records of activities involved in the experimental fishery are noted in the chronology in attachment D. The following section highlights the manner in which each facet of the fishery was conducted, notes any discrepancies from the original plan, and briefly explains the results of each phase of the operation.

2.1 Staging for the Test Fishery

The PGA team began staging for the test fishery in early March. Robert Glenovitch shipped his custom-manufactured aluminum roe on kelp rafts and other equipment from Bellingham to Sitka on the F/V Alicia Jo. Crew from the St. Zita assembled the rafts and moored them in New Thompson Harbor on March 13.

About 60 fish totes were stored on a barge leased from Excalibur Drilling. Located inside the Thompson breakwater, the barge served as a useful platform for the kelp stringing and open harvest platform loading operation.

2.2 *Macrocystis* Kelp harvest

High quality *Macrocystis* kelp is essential for the production of excellent herring roe on kelp. Desirable kelp blades are at least 6 inches wide and 20 inches long, with smooth margins, no holes and free of encrusting growth.

Although *Macrocystis* grows from Dixon Entrance to Icy Strait, mature blades meeting these harvest criteria in the early spring are not abundant throughout the plant's Alaskan range. On March 13 and 14, Darrell Kapp and crew inspected *Macrocystis* kelp beds around Baranof Island. No kelp of sufficient blade size and abundance could be located near Sitka Sound.

Kapp conferred with Bill Davidson about the situation and coordinated a team of kelp harvesters to travel further south. On March 15, Jim Beaton directed his crew on the F/V Starrigavan to depart Sitka for Sea Otter Sound. Kelp quality expert Warren Westrom

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screened several kelp beds and located a supply of mature *Macrocystis* about 120 miles south of Sitka. Beaton notified ADF&G of the harvesting site and schedule.

On March 16, PGA's biologist and two ADF&G technicians flew to the North end of Heceta Island where they rendezvoused with the Starrigavan crew. Two fishermen that live on Heceta Island were contracted to gather kelp for the fishery, and joined the team onsite.

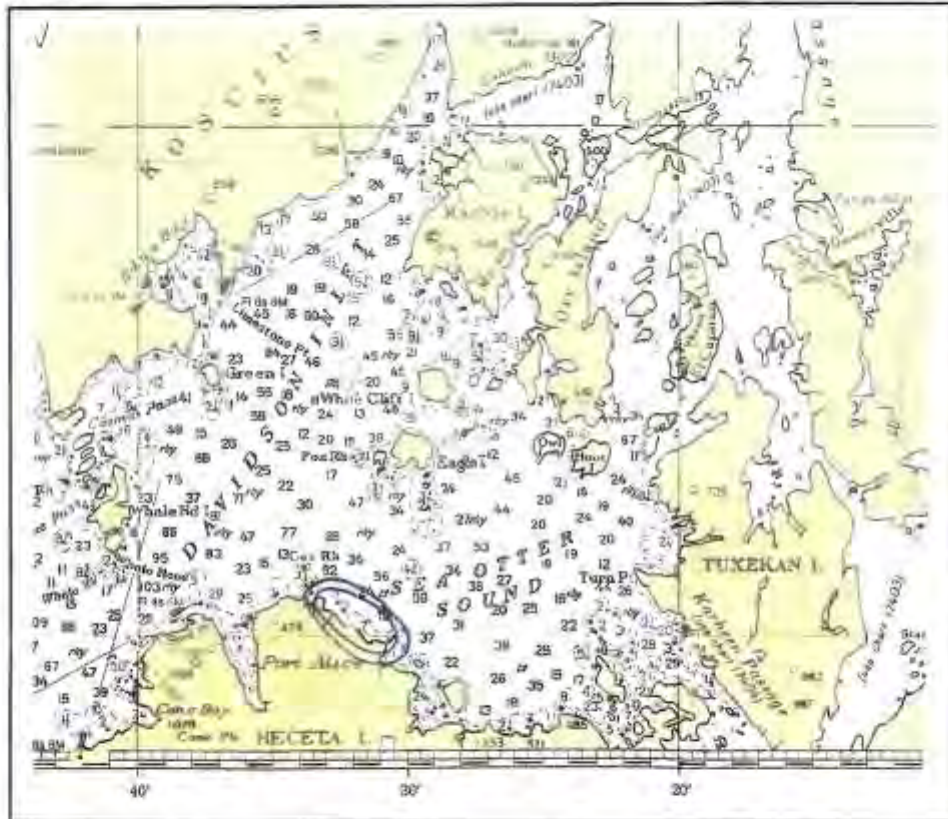


Figure 2.1 Nautical chart indicating the location of the North Heceta Island kelp bed. Nine people harvested about 4,000 *Macrocystis* fronds from this site in about 10 hours.

The following individuals participated in the kelp harvest at North Heceta Island:

- Johnny Weyhmiller and crew
- Rob Miller, Sitka
- Charley Frisbee, Hyدابurg
- Lee Morris, Captain
F/V Starrigavan
- Steve Frago, Crew, F/V Starrigavan
- Becca Johnston, Crew, Starrigavan
- Michelle Ridgway, PGA Biologist
- Warren Westrom, Kelp Quality Advisor
(Nicole DuClose & Eric Parker, ADF&G)

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The kelp team commenced with the *Macrocystis* harvest on the morning of March 16, and completed the task by 1900 hours that evening. All kelp used in the test fishery was harvested from one bed located at North shore of Heceta Island, about two miles SE from Gas Rock, at 55°49.43 North 133° 31.145 West (Figure 2.1). This site lies within ADF&G statistical area 103-90.

In accordance with contract stipulations Warren Westrom directed the kelp team to weigh and inventory each tote of kelp and maintain the kelp harvest logbook. Pursuant to ADF&G kelp harvesting regulations 5 AAC 37.300, the crew harvested *Macrocystis* from small skiffs by hand, removing only the upper portion of the fronds.

Westrom oversaw that kelp harvested met quality control standards. Frond sections taken were about six to eight feet long. The four to five newly formed blades at the tip of each frond are unusable and were trimmed off to reduce mucilage buildup in the totes.



Photograph 2.1 *Macrocystis* kelp harvesting in Sea Otter Sound, North shore of Heceta Island. Kelp blades are in good condition, but slightly smaller than preferred. PGA's biologist, Michelle Ridgway was monitoring the harvest and observing for impacts to the kelp resource and effects on marine mammals and birds in the area. 16 March 1998

A total of 10,236 pounds of kelp was harvested and transported in 40 standard fish totes. The ADF&G research team estimated that this consisted of 4,080 fronds with an average of 16 blades per frond, or 65,280 total blades.

The Starnigavan crew lashed the totes of *Macrocystis* to the deck, and kept them lidded during transport. Weather was rough through Chatham Straits, but the kelp arrived at Thompson Harbor in excellent condition.



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Kelp Harvest Impacts

The ecological effects of the kelp harvest were difficult to gauge. As there was no provision made for conducting a quantitative study of the kelp prior to harvest, both ADF&G field technicians and PGA's biologist made general observations of the harvest.

Ridgway photographed the kelp bed prior to and following harvest. Neither observations made on the day of harvest nor the photographs reveal that the bed had been diminished in any way. ADF&G biologists revisited the kelp harvest site on April 9, and reported that "there was no obvious impact on the kelp bed". Ridgway revisited the site in July and September. Based upon surface observations only, she did not see obvious signs of deterioration in individual plants or in the bed.

Even when harvesting fronds in the kelp bed, it was difficult to detect any reduction in the kelp biomass. However, it was obvious to all pickers when high quality blades became scarce in an area. Upon completing the harvest, we felt that we had taken most of the higher quality fronds from the kelp bed – which is about 1/3 square mile in size.

We assume that impacts to the kelp bed from this harvesting included some damage to the individual plants which were "pruned". Because only one or two fronds were taken from each plant, the *Macrocystis* plants will likely recover the lost biomass by summer's end.

Ridgway observed seals, cormorants, marbled murrelets, gulls and numerous seaducks in the bay during harvest activities. Three seals remained in the kelp while skiffs collected fronds, it did not appear as if they were disturbed at all. Other than the likely short-term disruption to the fish and invertebrate populations dwelling under the kelp canopy, it does not seem as if this year's level of harvest resulted in long-term damage to the kelp bed or the ecosystem it supports.

Kelp User Conflicts

Potential conflicts between the Spawn on Kelp Experimental Fishery and subsistence harvests of kelp or SOK on the West Coast of Prince of Wales Island was cited as a concern prior to the fishery (Comments to the Board of Fisheries by Dolly Garza, 1998).

The PGA team harvested kelp for the experimental fishery only at the Heceta Island site, many miles away from the traditional kelp harvest areas used by the communities of Craig, Klawock Sitka and Hydaburg (see figure 1 in the Executive Summary). There were no concerns or conflicts reported as a result of the kelp harvest.

2.3 Open platform fishing

The Starrigavan crew arrived with the *Macrocystis* in the evening on 17 March. The PGA core team of seine boat skippers and advisors met to review the kelp loading procedure and by 2100 hours mobilized their crews to begin work. The ADF&G staff were notified of project activities and were on site as the kelping procedure began.

Four seine boats anchored rail to rail in Thompson Harbor, near the Excalibur barge. In windy, cold weather, 37 crew members, boat captains and four contractors engaged in stringing and loading kelp on racks for 6 1/2 hours, completing the task at about 3 a.m.

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The kelp loading procedure involved the following steps:

- *Macrocystis* fronds were removed from totes and trimmed to 6-foot lengths
- A seine lead weight was attached to the bottom end of the frond, and a length of gangion line to the top end of the frond. The gangion was made off to a piece of groundline. Fronds were spaced about 1.5 meters apart along the kelp line.
- Lines bearing fronds were "coiled" into totes, much like baited longline gear
- The Merlin crew took fully loaded totes to the open harvest platforms, and "shot" the lines into place. From 37 to 43 lines were placed on each of four platforms, each line bearing about 28 fronds.
- Kelped platforms were then allowed to settle for about a day in Thompson Harbor



Photograph 2.2 Loading kelp; late night in Thompson harbor. Two assembly lines involving about three dozen-crew members prepared kelp fronds for suspension in the open harvest platforms. Weights and gangions were attached to each frond, and then fronds were attached to kelp lines on the four platforms. 3,858 fronds were fished in the experimental fishery.

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On March 19, vessels in the PGA fleet slowly towed two loaded kelp racks to fishing sites designated by Darrell Kapp with input from Subsistence Coordinator, Mike Miller. Details of the logistics involved in handling each rack during the fishery are provided in the Chronology (Attachment D), and in the interim report (Attachment E).

Rack K-1 was anchored in a small cove on the SE end of Middle Island, and K-2 was secured in a nameless cove on the SW end of Middle Island in the evening of 19 March (Figure 2.2). On 20 March, racks B-1 and B-2 were towed to anchorages on the north end of Kasiana Island and to North Magic Island. Later on the 21st, raft B-2 was tied to a private dock located on Halibut Point Road, where it remained for the rest of the fishery.



Figure 2.2 Location of each open harvest platform used in the SOK experimental fishery

All rafts were adorned with two to four blinking warning lights and signs displaying ADF&G permit numbers. Each raft was positioned near a steep beach, and tied to shore with one or two stout shorelines. The corners of each raft most distant from the beach were secured using 50-pound longline style anchors.

Spawn Deposition

1998 was an excellent spawning season in Sitka Sound. ADF&G reports that spawning in the Sound occurred from March 19 through April 12, with major spawning from March 21-25. Spawning events began earlier than usual, and over 65 miles of shoreline was spawned upon.

We observed spawning at every raft by the 21st of March. Schools of male and female herring milled around the rafts and, seemingly responding to the same cue, females

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began to deposit eggs on the kelp blades. Like a seamstress sewing stitches, each female laid her eggs on blades in rows. Males released milt in the rack areas on an intermittent basis. On March 23rd, the PGA team and ADF&G managers observed that most of Sitka Sound was a sea of milt.

While the gear was fishing, two dozen members of the PGA team shared the task of monitoring rafts for spawn deposition, observed and responded to subsistence fishing activities in the area, and generally guarded the platforms (see Chronology). Each raft was tended each night they were in place. The crew monitored spawn deposition at each site, and eventually lowered most kelp lines to improve blade exposure to spawning herring.

During the fishing period, representatives of the Alaska Department of Fish and Game, USFWS Protection, members and staff from the Sitka Tribe, and members of the general public from Sitka visited the roe on kelp rafts.

By March 23, all racks had from one to four egg layers deposited on most blades. At about 8 o'clock p.m, the Ryan D. Kapp towed platform number B-2 from the Halibut Point Road site about five miles to Cedar Cove in Katlian Bay. The raft was tended overnight while the product soaked to cleanse away excess milt.

On the 24th, the remaining three rafts were towed to Cedar Cove for soaking. Weather was calm, and product loss from the rafts during the tow was negligible. Seine boats towed the rafts at a speed of about 2 knots.



Photograph 2.3 Open Harvest Platform fishing! The PGA team inspected platforms several times daily. If upper blades were not receiving spawn deposition, ganglion extension lines, or "drops" were used to lower the kelp lines in the water column.

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Photograph 2.4 The condition of *Macrocystis* blades was closely monitored. Cool temperatures, high saline water and early spawning in Sitka contributed to the preservation of kelp quality.

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2.4 Roe on Kelp Product Harvesting

Five seine boats and their captains and crew gathered in Cedar Cove for harvest of the first rack on the morning of the 24th of March. We first worked with the ADF&G research team to tag randomly designated fronds for sampling and set up ADF&G's sampling station. About 30 people engaged in harvesting and packing roe on kelp for about three hours.

The team removed each frond from kelp lines, then snapped all blades off of the stipe or stem, stacked blades carefully and then packed them into standard-sized fish totes. ADF&G collected every marked frond for sampling and maintained counts of all fronds harvested. Totes full of roe on kelp blades were loaded on to the deck of a seiner, and taken to the Sitka Sound Producer's Cooperative for processing.

The crew harvested the three other racks in this manner on March 25th. Weather was cold, windy, and sleeting occasionally. The harvest proceeded without incident of note. About 50 totes of roe on kelp were delivered to the SPC plant by evening of the 26th.



Photograph 2.5 Paul Gronholdt's F/V St. Francis positioning a kelp platform in Cedar Cove following a two-hour tow from the fishing grounds. The roe on kelp was allowed to soak in the mill-free waters for 12 to 24 hours prior to harvest to reduce product adhesion.

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Photograph 2.6 Product harvesting begins. Teams of kelp handlers worked from the decks of two seiners moored to the platform. ADF&G researchers have set up a sampling station on the aft deck of the Robert Glenovitch's St. Zita.



Photograph 2.7 Kelp "clotheslines" were hauled in and fronds removed gently to avoid breakage. Two to four herring egg layers were deposited smoothly on most blades.

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Photograph 2.8 Deck crews removed weights and gangion lines from each frond, then snapped blades from the attachment point to the stipe, leaving the pneumatocyst attached to the stipe.



Photograph 2.9 Herring Roe on Kelp Harvest: Blades were gently placed into fish totes for transit to Sitka Producers Cooperative, about two hours away.

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Photograph 2.10 Herring Roe on Kelp Harvest: Ungraded *Macrocystis* blades were stacked carefully to prevent egg loss during packing.



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2.5 Roe on Kelp Processing

Sitka Producer's Cooperative

Seine boats in the PGA fleet delivered about 50 totes of fresh *Macrocystis* blades laden with herring roe to the Sitka Producer's Cooperative on the 24th and 25th of March. 12,332 pounds of product were landed on 24 March, and 42,135 pounds were landed on the 25 March, for a total of 54,467 pounds of "raw" roe on kelp. Kanaway Seafoods Fleet Manager, Sandy Souter monitored the landings, recording weights of individual totes by raft. Per contract arrangements, landings were made on an ADF&G experimental fishery gear card (Attachment F).

An SPC crew of 8 to 14 people worked under the direction of Kanaway Seafoods SOK Operations Manager, Richard Walsh. This crew worked for about 7 days at the Sitka Plant. Crew size varied because some workers tended to intermittent deliveries of longline-caught fish to SPC. Processing at SPC would have continued an additional week or so, but specialized processing at an outside plant became necessary.

As described in PGA's Processing Plan, the crew proceeded to introduce a 100% brine solution into each tote following delivery. After initial brining, heavy depressors and lids were placed on the product, and totes were rotated until each attained the desired level of brine saturation. Absorption of salts from the brine is dependent upon kelp thickness and egg deposition consistency, and is therefore variable. Over the course of about 24 hours, totes were treated with two to four brining sessions.

Brined blades were trimmed, graded, drained in baskets and then weighed. Blade pieces were placed in pails by grade, and topped with a scoop of fine salt (Photographs 2.11 – 2.15). The target net packing weight was 34 pounds of product per pail. The crew filled each pail with brine and shook loose any air bubbles, then they sealed the pails with airtight lids for storage.

The product was held at about 20° Fahrenheit during all phases of storage, domestic shipping and transport overseas. The high salt content of the product precludes damage from freezing at this temperature.

Silt Setback

During the course of processing, the Kanaway team discovered signs of silt in the product. They inspected further and found that two rafts had been contaminated with very fine layers of silt either on the kelp or mixed in with the egg layers.

Silt contamination is unacceptable in the marketplace. Since SPC did not have the proper equipment for inspecting and cleaning silt from the product, the crew sealed brined totes from two silty rafts and shipped them south.

The crew palletized the processed pails and loaded them with brined totes into containers for shipment to Bellingham. Alaska Outport Transportation Association and Northland Services, Inc. transported totes of unprocessed product and pails of processed product from Sitka to Home Port Seafoods plant in Bellingham on April 11, April 20 and May 7.

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Kanaway Seafoods, Inc. Bellingham, Washington

Eight to ten crew processed Sitka Sound roe on kelp for about ten days. According to Richard Walsh, about five days of this time was consumed addressing the siltation problem. The cleaning effort was worth while, as it effectively salvaged the product and improved both grade and price.



Photograph 2.11 About 50 totes of SOK were harvested from Sitka Sound during the test fishery. Blades were treated with a saline solution until the product was saturated with brine. The Sitka Producer's Cooperative crew processed SOK from two rafts, and shipped totes from the other two rafts to Bellingham to remove fine silt with specialized equipment.

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Photograph 2.12 Kanaway Seafoods processing experts guided Sitka Producers' Cooperative crew members in trimming and grading Roe on Kelp produced in the 1998 test fishery.



Photograph 2.13 Roe on Kelp grades are based upon kelp quality and size, and on thickness and uniformity of the herring spawn deposited on each blade. Sitka Sound SOK was of very good quality, and was well received by consumers in Japan.

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Photograph 2.14 The SPC crew drained and then weighed SOK into 17-pound baskets. Graded product was then consolidated into pails for shipment to Japan.



Photograph 2.15 Pailed SOK was topped with a scoop of fine salt, air bubbles were "bounced" out of the pails, and then each pail was lidded. This brined product was held at 20 degrees during storage and shipping. 57, 038 pounds of roe on kelp was produced during the test fishery.



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2.6 Product Quality Assessment and Marketing

Sitka Sound "Kazunoko Kombu" was graded both in Sitka at the SPC plant and at the Home Port Seafoods plant in Bellingham. Richard Walsh was responsible for directing all grading. All graded and pailed ROK was held at the Bellingham Cold Storage for buyer evaluation.

In advancing along the learning curve through the execution of this experimental fishery, some SOK grading criteria were not met. These are parameters which influence the ultimate price for the product and which can be improved upon in the future:

- Some *Macrocystis* kelp was too young and exuded mucilage such that eggs did not adhere well.
- The size of most of the blades used was slightly smaller than ideal – broader blades would have been more acceptable.
- The egg coverage was generally very good, some was not consistent
- Kelp "melting" – some kelp showed signs of deterioration at processing time.
- Silt was present in some of the product, even after extensive washing
- Egg sloughing, or "peeling" occurred in a small percentage of the product, and is related to kelp deterioration

Pacific Coast SOK Quality Comparison

Kanaway's Souter and Dan Nomura offered the comparison that Sitka Sound product was better than the quality of SOK harvested in California – which is graded at a scale about two levels lower than was PGA's product. Within the region, Souter and Nomura estimated that PGA's SOK not quite on par with BC production. Nomura indicated that the Sitka Sound area resources are of sufficient quality to potentially produce BC grade SOK, but the BC fishermen's technique is more refined for dealing with Northern roe on kelp production.

In Nomura's opinion, Hoonah Sound SOK is still top quality in southeast Alaska – so superior that it fills a unique niche for extremely thick, or "jumbo" SOK in the Japanese gift market. Both in quality and in price, Sitka Sound product quality is between that of Craig/Klawock and Hoonah Sound.

Product Purchase by Japanese Importers

Upon inspection of the lots in late June, Kanaway Seafoods concluded negotiations on the sale of the product with the Japanese buyers. Their apprehensions regarding the purchase of product from a new location and some concern over residual silt in the roe inspired a very thorough inspection of product quality. The buyers concluded that most of the product was of good quality for the target market. Buyers purchased the entire volume.



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Sales of the product were finalized on 29 June 1998. Dan Nomura provided the following information on weights and grades assigned to the product.

Summary of Kanaway Seafoods Final Production and Settlement Report Prices and Total Values Reported are Net, Less 3.3% Processor Tax				
Grade	Weight (pounds)	Percentage By Grade	Price per Pound	Total Value (\$\$\$)
1	11,821	21%	\$ 7.58	89,603.18
2	30,166	53%	\$ 5.78	174,359.48
3	9,078	16%	\$ 4.40	39,943.20
4	1,461	3%	\$ 3.21	4,689.81
5	1,233	2%	\$ 1.19	1,467.27
5P	1,137	2%	\$ 0.45	511.65
5T	2,142	4%	\$ 0.45	963.90
TOTALS	57,038	—	(avg. \$5.46/lb)	\$261,538.49

Once in Japan, Sitka Sound Roe on Kelp was fairly well received by retail buyers and consumers. The Japanese companies processed the brined ROK into a variety of products for distribution. Most of the product was sold to the more common restaurant and grocery store markets. According to Dan Nomura, a small amount of Sitka Sound product was sold through the gift market. Buyers reported that the products were broadly accepted alongside production from other locales (B.C, Hoonah and Craig).

Product Prices

Marketing consultant Dan Nomura conceded that the prices paid for the Sitka Sound product were lower than hoped for, but were acceptable considering market circumstances. The seafood market in general has been suffering from the low value of the Japanese yen, an unfavorable exchange rate, and the flagging Japanese economy. Since roe on kelp is a specialty market, it has suffered more than have markets for more essential goods. These factors, coupled with product unfamiliarity, yielded suboptimal prices for a developed product, but satisfactory prices for first year production.

Japanese importers have expressed an interest in purchasing SOK from Sitka Sound in the future. Nomura feels that this interest will support increased production of SOK from southeast Alaska. However, several significant hurdles must be addressed.

Based upon his recent research in Japan, Nomura has concluded that the corporate gift market for roe on kelp is shrinking, but prices remain high for the smaller volumes purchased in this market. Markets for thinner product, like that produced in Sitka Sound, are slowly expanding. A trend that began in 1997, in which a decrease in import prices led to expanding the market for these lower priced products, continues.

Most British Columbia and California producers currently cater to this market. About 1.5 year's of production from these sites is currently on inventory. Nonetheless, Nomura feels that if Sitka Sound SOK methods were refined to more specifically meet market



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needs for a thinner, everyday Kazunoko kombu product, there will be opportunities for building markets for more SE Alaskan SOK.

General factors influencing the current market climate for Kazunoko Kombu and which will influence market expansion opportunities in the future include:

- Supply quantity of competitive sources of Kazunoko kombu
- Product quality
- Economic conditions in Japan
- Market niche development
- Pricing
- Inventory/Carryover
- Level of marketing effort and effectiveness

These issues present a challenge to the future of roe on kelp fisheries in Alaska. Experts such as Dan Nomura and Alaskan seafood marketing authorities are optimistic that implementing a well-devised strategy for producing consistently high-quality product to fit the needs of the thinner style Kazunoko Kombu market will yield favorable economic results in the long term.



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Section 3. Subsistence Fishery Interactions

Prior to the test fishery, subsistence stakeholders in the Sitka Sound region expressed apprehension regarding the potential impacts of the SOK fishery on traditional and customary uses of *Macrocystis* kelp, herring stocks and the roe-on-hemlock-branch personal use harvest. In response to these concerns, the Board of Fisheries directed ADF&G to require the contractor to carefully monitor the test fishery and endeavor to ameliorate any conflicts that might arise.

Macrocystis for the experimental fishery was collected miles away from traditional harvest areas near Craig, Klawock, Hydaburg, and Sitka. Therefore, there was no competition for kelp with the traditional and customary harvesters of kelp or roe on kelp in those areas.

PGA hired Mike Miller, member of the Sitka Tribe of Alaska, to serve as liaison between subsistence harvesters and the test fishery team. Miller participated in ADF&G planning discussions and tribal meetings before the 1998 herring season. Community members, city officials and others interested in the fishery contacted Miller before, during and after the season to have general questions answered from his local perspective.

Miller remained onsite in Sitka Sound during every phase of the test fishery (Photograph 3.1). In addition to monitoring subsistence activities in the Sound during the fishery, Miller also assisted subsistence harvesters who wanted to suspend hemlock boughs near or on the HROK platforms (Photographs 3.2, 3.3).

Miller communicated daily with PGA's onsite biologist, Michelle Ridgway. Miller received no reports of conflicts or complaints from members of the subsistence community at any time. Subsistence harvesters setting branches or harvesting wild spawn on kelp near the platforms said they had no difficulty working around the structures or attendant vessels. Excellent harvests were reported by subsistence harvesters collecting branches set on, near or miles away from the HROK platforms during the 1998 season (Photograph 3.4).

Concerns and questions from locals regarding the test fishery were also directed to ADF&G, the Sitka Tribe of Alaska leaders and staff, and to the City of Sitka. A summary of responses to the test fishery from these organizations follows.

Alaska Department of Fish and Game, Sitka Office

Dave Gordon, Bill Davidson and Doug Mecum directed the 1998 Test Fishery in Sitka Sound. They indicated that members of the Sitka community were interested in the fishery, and frequently asked questions about the new gear type. But no one from the public expressed having conflicts with the fishing team or their gear during the test fishery.

"Neither the department nor the contractor's liaison with PGA received any complaints from individuals participating in the subsistence harvest of SOK or roe on branches." Doug Mecum, Reporting to the Board of Fisheries in Wasilla, October 1998

Sitka Tribe of Alaska (Also see Attachment H)

Reported by Jude Pate, Legal Counsel for the Sitka Tribe of Alaska
and Jack Lorrigan, Biologist for the Sitka Tribe of Alaska

Jude Pate observed the test fishery through daily boat excursions to the test fishing grounds, and filmed many aspects of the fishery. He also solicited and documented the responses of Tribe members to the fishery during and following the season.

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Pate reported that the Sitka Tribal members involved in subsistence harvesting in 1998 reported "no conflicts with the 1998 test fishery participants or their gear". He conveyed that all test fishery participants were diligent in communicating with the Tribe, and are considered to have done an excellent job at conducting the test fishery,



Photograph 3.1 Paul Gronholdt, President of PGA, aboard the Tug Thunderbird – observing subsistence fishing near the test fishery platforms. All members of the PGA team shared in the responsibility of avoiding conflicts with traditional fisheries and adjusted test fishery operations as needed per PGA's subsistence liaison's guidance.

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Photograph 3.2 Sitka Sound area subsistence fisherman setting hemlock trees in an active herring spawning area for gathering herring eggs on branches at North Kasiana Island, March 1998. The trees were anchored with rocks and tied to trees on shore. Within three days these trees were covered with 4-5 layers of herring spawn.



Photograph 3.3 Subsistence fisherman, setting hemlock trees for subsistence harvest of roe on branches near an open harvest platform used in the test fishery. Miller and others fishing branches in the area had successful harvests and indicated that the platforms were not an obstacle to their gathering of herring eggs.

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Photograph 3.4 Sitka Sound area subsistence fishermen enjoyed an excellent harvest of herring eggs on hemlock branches in the 1998 season. With over 60 miles of spawn in the Sound, there was a multitude of sites available near town for traditional egg gathering.



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Section 4.0 Environmental Considerations

The conservation merits of the open harvest platform roe on kelp fishery were evidenced during this experimental fishery. Relative to sac roe and closed pounding fisheries, there are some clear resource conservation benefits. It is beyond the scope of this report to analyze these conservation aspects or to assess environmental impacts incurred during the OHP fishery.

Rather, we report here our observations made during the fishery, and mention the research undertaken by the Alaska Department of Fish and Game. Some commentary on potential impacts of this fishery and contrasts with environmental concerns arising in other herring fisheries are discussed briefly.

Alaska Department of Fish and Game Research

In order to learn as much as possible about the OHP fishing method and the impacts of this experimental fishery upon herring stocks and the *Macrocystis* resource, ADF&G initiated a research plan during the spring 1998 season. Department statistician, Dave Carlisle, designed a randomized sampling program to estimate the total amount of herring eggs deposited on kelp blades. These data were used to estimate the total amount of herring "participating" in the OHP experimental fishery.

Sitka management biologists and their crew carried out the sampling plan, and other southeast technicians conducted the egg deposition counts. In addition, ADF&G staff was present for every phase of the fishery. They recorded field observations, which might provide insight into impacts of the OHP method (Photographs 4.1 – 4.3).

In their preliminary report, ADF&G estimated that 10.5 billion eggs were deposited on kelp blades in the fishery. Based upon results of their fecundity study, ADF&G estimated that 104 tons of herring were utilized in the fishery. The conversion of herring to pre-brine weight of SOK is 0.26.

ADF&G reported that PGA harvested about 10,000 pounds (5 tons) of *Macrocystis* kelp, which included 4,080 fronds, each with an average of 16 blades, for a total estimate of 65,280 blades. The Sitka Area Management Biologist and his staff visited the harvest site on the north shore of Heceta Island about six weeks following the harvest. They reported that "there was no obvious impact on the kelp bed".

ADF&G's detailed findings from this research and data analysis are forthcoming. A summary of their preliminary research results is presented in the Progress Report to the Board of Fisheries, dated October 16, 1998.

The *Macrocystis* Resource and Kelp Bed Ecosystem

Southeast Alaska harbors extensive beds of *Macrocystis* kelp, but the biomass, distribution, and ecological role of these kelp beds is not fully known. The increase of herring roe on kelp fisheries in recent years has created competition for high quality kelp blades that are mature at the time of herring spawning activity. After conducting the test fishery, the PGA team feels that there is good quality kelp in southeast to support the growth of the roe on kelp fishery. However, a strategy may be needed to ensure that every fishery group has access to high quality kelp at the time of their fishery.



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In other Pacific coast regions with active roe on kelp fisheries, harvesters and managers have encountered times when high quality kelp was not available in sufficient abundance to support the fishery. This dearth of kelp has been due in part to factors including inter-annual variability, low light in spring months leading to poor early season growth, and possibly overharvests. Kelp scarcity has been experienced in Canada and California. In order to continue producing roe on kelp in some areas, British Columbia recently allowed roe on kelp "pounders" to harvest kelp in marine parks.

We do not yet understand the impacts of *Macrocystis* harvests on the plant, the kelp bed, or the marine community this habitat supports. We feel that the selective harvesting of fronds from some plants did not impact the kelp bed extensively. Because the harvest occurred early in the growing season, it is likely that emergent understory fronds replaced the biomass harvested by late summer.

Ridgway's observations of the kelp bed in July and September suggested that this was so. Non-quantitative observations indicated there were no gaping holes or obvious signs of damaged kelp in the bed that was harvested.

Marine species flying or swimming near the kelp beds at the time of harvest did not seem to be disturbed. We presume that the use of outboard engines, coupled with surface canopy frond removals would cause motile species to relocate – at least temporarily. The broader ecological implications of this kelp harvest are not yet known.

Herring Resources and Health

Both environmental and conservation benefits of the passive OHP fishing method for the herring stock are numerous. As described in Mundy, *et al* 1998, we observed herring volitionally swim into the kelped platforms and voluntarily spawn on hanging kelp blades. The fish were never herded and the PGA fishing team did not observe any signs of the herring being stressed when spawning. Even in the presence of crewmembers on the rafts, herring proceeded with spawning at a leisurely pace. It was assumed that most fish spawning on OHP kelp had already spawned elsewhere, or were destined to do so following deposition on the "fishing" blades.

Thus, herring "participating" in the OHP fishery contribute to the genetic diversity and gamete abundance of the Sitka Sound herring stock, and they swim away to return for potential spawning in subsequent years. The effects of this fishery on herring therefore seem to be in the removal of an unknown percentage of each spawner's gamete production.

Some other potential environmental consequences of the OHP fishery include:

- Herring seem to be attracted to the shelter provided by the platforms – their migration or spawning on wild habitat may be altered.
- Anchors used to secure the rafts may have some impact on the benthic community, but this is assumed to be minimal.
- Some blades may break away from the platforms, and eggs may slough off of blades to the seafloor. This may attract scavengers, and the sloughed eggs may not hatch. The impact of this is assumed to be negligible.



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Based upon observations made during the experimental fishery, these impacts appear to be minimal and have no inordinate or long-lasting environmental consequences.

Comparison of Environmental Consequences in other Herring Fisheries

In contrast to other herring fisheries and unlike other roe on kelp methods, the Open Harvest Platform method is not lethal to herring or *Macrocystis* kelp. The OHP manner of harvesting results in a removal of gametes from the herring genetic pool and partial removal of biomass from individual kelp plants.

Herring involved in the traditional sac roe fishery are either killed, or are held while roe composition is determined, and then released. Ultimately, they are considered dead.

Seined herring introduced into closed herring roe on kelp pounds are allowed to spawn for several hours to several days. Because there is no reasonable means of counting the number of fish in the pounds, Commercial Fisheries Director, Doug Mecum, noted that "we are unable to regulate the amount of herring in each (closed) pound" (January 1998 BOF Meeting, Sitka).

This situation has led to fishermen exceeding the herring quota in these fisheries on numerous occasions. Additionally, some fishermen and observers of the fishery report that the fish are clearly stressed while in the pound, and upon release.

Recent research in Prince William Sound has confirmed that closed pound herring have a high rate of viral infection. In 1998, this VHS virus was isolated from the water of three pounds in PWS in sufficiently high levels to transmit the disease to nonimmune fish.

Wild harvests of roe on kelp in Alaska involve the taking of whole seaweed plants using knives, rakes, or by handpicking. In contrast, *Macrocystis* is not killed or dislodged during harvest for use in the OHP fishery.

Because herring are neither crowded nor stressed when using the OHP method, the environmental consequences incurred in the sac roe and closed pound fisheries are not at issue. This sublethal take of both herring and kelp resources is more beneficial to the genetic integrity of those species and likely contributes to potential sustainable yield of those resources.

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Photograph 4.1 The Alaska Department of Fish and Game, Commercial Fisheries Division developed a rigorous research plan to gather data on the experimental fishery.



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Section 5.0 Economic Review

Although the 1998 experimental fishery was, by design, not a profitable endeavor for PGA, a review of the costs and benefits resulting from the fishery are useful for predicting the potential scale of economic impact the alternative fishery could have on Sitka. Benefits derived by the Sitka Community through the 1998 experimental SOK fishery included direct income to locals through short-term jobs, and moneys generated through taxes and retail sales of goods and services.

This section is not intended to serve as an economic analysis of the spawn on kelp industry. Figures on the revenues generated in the fishery are in section 2. Comparisons of the economic yields in various herring fisheries are reviewed in Mundy, Sharr and Ridgway, 1998. This section provides a synopsis of the types of expenditures incurred in the fishery, and an approximation of the labor force involved in each phase of the operation.

Sitka Area Jobs

An average of about ten local people worked at Sitka Producer's Cooperative processing roe on kelp for about seven days. They were paid through contractual arrangements between SPC and PGA. Four other southeast residents were contracted by PGA to assist with the kelp harvest (two from Sitka, two from the Craig area).

Eight to ten people worked on further processing at the Home Port Seafoods plant in Bellingham for ten days. Had the product not been silted, or if proper equipment had been available in Sitka to handle the silt-cleansing task, this employment would have been based in Sitka.

Two consultants from the Lower 48 and two consultants from southeast Alaska were hired by PGA for onsite monitoring of the fishery, to serve as local liaisons, and to report on performance of the test fishery. These contracts were for one to several weeks in duration.

In order to monitor and conduct research on the experimental fishery, ADF&G tasked southeast staff with project-specific duties. This resulted in additional work for field technicians, statisticians, lab technicians, and Sitka area management staff. Most of the additional staff time and associated costs were compensated for by the contractor's required surety bond with the State.

Overall Labor Force Involved in the Fishery

Fishing by the Open Harvest Platform method is very labor-intensive. Since most captains and crew were new to this fishery, the test fishery involved a great number of people for some parts of the operation. Over time, crews may become somewhat more efficient, but the sophisticated nature of the fishery requires a great deal of attention to detail, and always requires more labor than the direct harvest herring fisheries.

Based upon logbooks entries and notes made by PGA team members, the table below summarizes the estimated number of workers involved in each phase of the test fishery in 1998.



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Estimated Number of People Involved in the Experimental Fishery				
Phase of the Fishery	Number of People Involved *			Approx. Number of Person-Days*
	Total	PGA Crew	Contractors Or plant crew	
Mobilization and Staging	6	6	0	24
Kelp Harvest	9	4	5	11.25
Loading Racks w/ Kelp	37	31	6	27.75
OHP Fishing	10	8	2	40
Towing Rafts to Harvest	8	8	0	8
Harvesting in Cedar Cove	30	30	0	45
Harvest/Transport to SPC	6	6	0	9
Processing at SPC	8-12	0	8-12	70
De-Mob in Sitka	4	4	0	4
Processing at Home Port	8-10	0	8-10	90
Loading/Shipping to Japan	3	0	3	0.75
Marketing/Sales Effort	1.5		1.5	30
TOTALS	—	—	—	359.75

*Est. person days = average number of people X estimated # days worked on that task

General Expenditures in Sitka

Beyond the investment in equipment and costs to mobilize in Sitka, the PGA team incurred some expenditure while conducting the fishery in Sitka. These general costs included the following:

- Barge Lease
- Lodging for some PGA members
- Restaurants and groceries: (About 30 people for six days)
- Fuel for five vehicles and some vessels
- Three rental cars
- Taxicabs
- Entertainment
- Harbor Fees
- General purchases -- supplies

The community of Sitka received some benefits through city sales taxes. And 3% of the total ex-vessel price of the roe on kelp product was paid to the State in raw fish taxes. A percentage of this contributes to the City of Sitka's community apportionment of statewide raw fish taxes.



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Discussion and Final Remarks

The 1998 Experimental Fishery proceeded largely as anticipated. PGA's collective experience, as well as good weather and an early herring spawn contributed to the overall success of the fishery.

The roe on kelp suffered from the silt infiltration, but otherwise the product met expectations reasonably well. The price paid was sufficient to cover most costs for conducting the experimental fishery and associated research and management. The PGA team feels that the quality of product can be improved with increased monitoring of seawater conditions prior to and during the fishery.

The Sitka Community did not experience any resource user conflicts as a result of the fishery. Commercial and subsistence harvesters appeared to be either unaware of the fishery, or content with the manner in which it was conducted in Sitka Sound.

Within the scope of the PGA team's ability to observe impacts on the marine ecosystem, the fishery met many of the anticipated environmental and conservation goals. Neither fish nor kelp plants were likely killed in this "harvest".

Final Remarks

The quantity of Sitka Sound SOK available for harvest in the future is dependent upon the abundance of spawning herring and *Macrocystis* kelp and management decisions regarding their exploitation rates. The Alaska Department of Fish and Game, the Commercial Fisheries Entry Commission and the Board of Fisheries will determine resource assessment, quotas and allocation issues.

The overall market outlook is challenging. Experts conveyed that implementation of a strategic plan to tailor roe on kelp production to fit emerging market trends is necessary to ensure SE Alaska's product a niche in this specialty market arena. Participants in the 1998 experimental fishery concur that meeting these market needs with more refined Sitka Sound roe on kelp product is plausible. The PGA team feels that pursuing this market potential and hence diversifying the herring fishery management regime will provide broader economic benefits from this resource to the people of southeast Alaska.



ASSESSMENT OF *MACROCYSTIS* BIOMASS, QUALITY, AND HARVESTING EFFECTS
IN RELATION TO HERRING ROE-ON-KELP FISHERIES IN ALASKA



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ABSTRACT

Interest in harvesting *Macrocystis* kelp for use in herring roe-on-kelp (ROK) fisheries is increasing, but information on the biology and ecology of kelp is limited for southeast Alaska. This is a report of a four month pilot study to evaluate the amount of kelp available for harvest and the recovery rates of kelp from harvest. Estimating the amount of kelp available consisted of first estimating the total abundance of kelp in a survey area and second estimating the biomass of available and desirable kelp. The total biomass was estimated by surveying the surface area of kelp beds in selected regions on the west coast of Prince of Wales Island. Randomly selected index beds were surveyed to determine kelp density, and samples were measured and weighed to estimate the average weight of kelp. An estimated 225,225 tons of *Macrocystis* kelp were found in the survey area. The harvest of kelp for ROK is highly selective. By comparing harvested to available kelp, it was found that blades at least 14 cm in width and fronds with a high proportion of desirable blades were selected. The proportion of blades and fronds meeting these selection criteria was estimated for the index beds, and the biomass of desirable kelp was estimated to be 32,663 tons or about 14% of the total kelp biomass in April. The growth in kelp canopy was rapid from March to April, with March canopies about 45% smaller than April canopies. Therefore, the biomass of desirable kelp in March was about 18,000 tons. Even if kelp harvests increase 10 times over present levels, the harvest will only represent about 3% of the lowest estimate of the biomass of desirable kelp.

There were few significant effects of experimentally harvesting kelp canopies in March and/or April. Kelp beds that were experimentally harvested at both times or only in April had shorter fronds and possibly fewer large fronds and fronds per plant. This experiment was monitored only one month after the last harvest, so there may not have been sufficient time for the cut kelp to fully recover. This preliminary experiment indicates that kelp recovers rapidly from harvesting in the spring.



INTRODUCTION

Kelp beds are a conspicuous element of the outer northeast Pacific Coast (Foster and Schiel 1985). All kelp belongs to the order *Laminariales* (*Phaeophyta*), and are made up of holdfasts, stipes, and blades. Some of the kelps produce floats that buoy them to the surface, these are known as the canopy forming kelps. The giant kelp, *Macrocystis* sp., is a well known canopy forming genus that occurs in much of the coastal Pacific Ocean. The terminology associated with *Macrocystis* is fairly complex as is the morphology (Figure 1), consisting of an attached holdfast with numerous fronds supporting numerous blades. *Macrocystis* often grows in thick beds that form a unique and important habitat.

Kelp beds play an important role in nearshore ecosystems in at least three ways (Duggins 1988). Kelp beds greatly increase the habitat complexity, increase sedimentation rates, and contribute large amounts of fixed carbon to the ecosystem (Duggins 1988, Duggins et al. 1989). Kelp beds provide as much as 15 m² of surface area for every square meter of substrate (Wing and Clendenning 1971), providing habitat for infaunal and epifaunal organisms (Duggins 1988). In addition, several species such as fish, mysids, and shrimp utilize kelp beds extensively (Coyer 1984). Juvenile and young-of-the-year fish may exhibit particularly strong, positive relationships with kelp beds (Carr 1991, Ebeling and Laur 1985). Kelp beds can also be significant sources of production, contributing large amounts of carbon in the form of attached plants, drift plants, particulate organic matter (POM), and dissolved organic matter (DOM) (Duggins et al. 1989). This carbon production is not limited to kelp beds as some of the unattached plants drift outside of the bed with some pieces drifting miles from the source bed. In areas with lush kelp beds, about 50% of the total carbon in some fishes and birds is derived from kelp primary production (Duggins et al. 1989). Finally, kelp beds alter the flow of water in and around the bed (Jackson and Winant 1983). This altered flow results in higher sedimentation rates that may increase suspension feeding and recruitment of planktonic larvae. Altered flow caused by kelp beds may also increase the availability of planktonic food sources, such as barnacle cyprids, to resident kelp bed fish (Gaines and Roughgarden 1987).

The morphology of kelp blades has been shown to be dependent upon water movement in many kelps (Norton 1969, Druehl 1978, Norton et al. 1982, Koehl and Alberte 1988). In low flow areas, blades generally have more undulations, are larger, wider, and are not split. *M. integrifolia* shows similar plasticity in growth form (Druehl 1978, Hurd et al. 1997). This plasticity in growth form is highly functional. Undulations dramatically increase drag forces, resulting in higher blade mortality in high flow regimes, but in low flow areas the undulations serve to increase nutrient uptake by initiating turbulent flow around the blade (Hurd et al. 1997). Also, larger blades are better able to gather light but cannot withstand the drag and accelerational forces exerted by wave action (Denny et al. 1985).

There has been interest in harvesting kelp for various purposes on the Pacific Coast of North America since at least 1911 (Foster and Schiel 1985). In California, about 100,000 tons of kelp are harvested annually for various products. Harvesting north of California has been sporadic, with few large scale commercial harvests. In British Columbia and Alaska *Macrocystis* kelp is harvested to support the herring roe-on-kelp (ROK) fishery. Since the price paid for the end product is dependent upon the quality of the kelp blade, harvesting kelp for ROK is highly selective. In particular, fronds with many wide blades are desirable.

The research described here was initiated due to interest in harvesting kelp for a roe-on-kelp (ROK) fishery near Sitka, Alaska. A proposal was made by commercial harvesters to the Alaska Board of Fisheries in 1996 to allow Sitka Sound herring sac roe purse seine permit holders the option of using open pound racks to harvest herring roe on kelp. This would be in lieu of, or in addition to, using purse seines. The board took no action on the proposal at their 1997 meeting, but requested that the department conduct



an experimental gear test fishery. The department conducted the test fishery in 1998 focusing on management issues related to the pound fishery and the gear. A second test fishery was conducted in 1999 primarily to fund the kelp research described here, as well as to revisit some issues related to fishery management. A second proposal to allow for a roe-on-kelp fishery in the Sitka area will go before the board at their 2000 meeting.

An understanding of the abundance and dynamics of giant kelp, *Macrocystis* spp., is essential to manage the use of this alga for existing and emerging herring ROK fisheries. Kelp harvests in Alaska are currently being managed with limited knowledge of kelp abundance, growth, or recruitment. In conjunction with other roe-on-kelp fisheries, the Sitka Sound open harvest platform herring roe-on-kelp test fishery presents the possibility of greatly increasing the harvest pressure on *Macrocystis* kelp resources. At least two pieces of information are needed to properly manage kelp harvests in Alaska, 1) the amount of kelp that is available and desirable for harvest, and 2) the effects of harvesting on kelp beds and associated communities. This report provides a preliminary assessment of the abundance of *Macrocystis* kelp resources in Alaska. Also, the results of an experiment assessing the short term effects of harvesting on kelp beds and the ability of kelp beds to recover from harvests are reported.

METHODS

Standing Crop Estimates

Aerial Surveys

Aerial surveys of kelp beds on the west coast of Prince of Wales Island were conducted between March 23-29, 1999 (Figure 2). The coastline was surveyed by Scott Walker, an experienced ADF&G herring spawn recorder. During the flight all significant *Macrocystis* kelp beds were marked in red pen on black and white charts by the surveyor, recording the approximate outline of each bed. The area around Duke Island and Tree Point was surveyed on 11 June 1999.

The resulting maps with marked kelp beds were analyzed to ascertain the surface area of kelp beds. The original maps were scanned into digital format (Figure 3), and an image that included only the red "kelp beds" was produced from the original scanned image (Figure 4). These two images were produced with Adobe PhotoShop. Using an image analysis program (Optimus), the original image was used to scale the red only image, using landmarks of known length. An averaging procedure (5x5 pixels) was applied to the red-only image to eliminate small lines, numbers, and letters within the red patches. The red patches were then automatically outlined, and any remaining unwanted "holes" or other images were removed by hand. The image analysis program then determined the total area of mapped kelp beds and the data were downloaded to Excel for analysis. The Duke Island and Tree Point survey was not analyzed due to relatively low *Macrocystis* abundance and limited time.



Index Beds

One index bed was randomly selected from each subdistrict surveyed, resulting in a total of 11 index beds. To select a bed, a randomly placed point was located in each subdistrict. The bed that was closest to the point and was at least 20 m² in surface area was selected. To estimate the growth of beds during the spring, these index beds were photographed during the March aerial survey and on April 28, 1999. Photographic methods were consistent between dates and the altitude was recorded for each photograph. For each index bed, a pair of photographs, one each from March and April, were selected based upon similarity of photograph angle, direction, and altitude. The photographs were scanned into digital format and analyzed using Optimus image analysis program. All canopy forming kelp was outlined by hand using the image analysis program and the total area of kelp plant canopy (excluding water area between fronds) was obtained. This is not the same measure of the surface area of beds obtained from the hand-drawn bed maps in March which includes water area between fronds.

The April photographs were calibrated using a photograph of an object of known dimensions taken from the same altitude. The March photographs were calibrated by measuring a distinctive object in the April photograph and using the same object as a scale in the March photograph. This procedure insured that each pair of photographs were calibrated similarly. If the calibrations were off, they were off by the same amount for each date so between date comparisons could still be made.

To estimate the length of fronds and the density of plants and fronds, four index beds were visited between April 19-24. The density of kelp in each bed was estimated by scuba divers. Six transects were oriented perpendicular to the long axis of the bed and placed at even intervals along the length of the bed. If transects were longer than 20 m, then 20 m long sections were sampled at the inside edge, outside edge, and approximate center of the transect. The total length of the transect was recorded as well as the distance between transects. The start and end depths of each transect were also recorded. Divers swam along transect lines and counted the number of large (>1.5m) and small (<1.5m) *Macrocystis* fronds for each holdfast encountered within one meter of the transect line. Every tenth frond was measured for length starting with the tenth frond.

Commercially Harvested Bed

Kelp was harvested for the Sitka Sound open harvest platform test fishery from a bed on the northeast side of Port Alice in Sea Otter Sound (Figure 2). This bed was surveyed by scuba in March just after the harvest and again in April as part of the index bed survey. The methods of survey were similar to the methods used for the index beds. The total harvest taken from this bed was recorded.

FronD Biomass

To estimate the average weight of fronds, 22 fronds of varying length were weighed and measured. The fronds were cut into 1 meter sections starting from the tip and working towards the base. The weight and section number were recorded for each section. At the base, the length of the final piece was also recorded. Thus, the total weight and length of each frond could be determined.

Total Biomass Estimates

The total biomass was estimated by multiplying the total surface area of kelp beds (March) by the average density of large fronds (April) and the average weight per frond (April). The average weight per frond was estimated by multiplying the ratio estimator of average frond weight/average frond length from the weighed fronds by the average length of fronds in the index beds. The relationship between frond length and weight was linear and had a zero intercept, so using a ratio estimator was appropriate. The surface area of the beds drawn in March was assumed to remain constant through April for purposes of this calculation.

An estimate of the variance associated with the total biomass estimate was generated by combining variance estimates for both frond density and average frond biomass. Frond density averages and variances were weighted by bed size (Cochran 1977). The variance associated with the average frond biomass was calculated using the methods of Barnett (1991).

Estimated Versus Harvested Biomass

Two small beds were surveyed by scuba divers to assess the accuracy of the biomass estimates. The beds were small (<150m²) enough that an entire frond count census was completed for each bed in one day by two scuba divers. Every tenth frond was measured for length. After surveying, the canopy was harvested from both beds and the total frond biomass was harvested from one bed. All harvested material was weighed. Thus, the estimated biomass from scuba sampling could be compared to the actual biomass obtained by harvesting.

Desirable Biomass

Blade Morphology

The morphology of individual kelp blades was examined to assess the desirability of kelp. Three fronds from each of ten systematically located points in the Port Alice bed were collected before any commercial harvest occurred. The tenth, fifteenth, and twentieth blades from the apex were detached and measured. The youngest free blade was counted as blade number one. The total length and maximum width of each blade were measured. In addition, the number of holes in the blade, the general condition of the blade, and the presence or absence of epiphytes and silt were recorded. The harvested kelp was also sampled. Forty haphazardly selected fronds were collected from the harvested kelp and three randomly chosen blades were sampled. The morphology of blades sampled before harvest was compared to commercially harvested blades to determine the criteria used to select blades sampled.

Fronds were collected from the four visited index beds to determine the proportion of desirable blades over the entire region. Fronds were collected over dive transects. The initial goal was to collect a frond at three locations (inside edge of bed, outside edge of bed, and in the center of the bed) along each transect,



but time constraints often reduced the sample size. Blades were then sampled in the same manner as the blades in the harvested bed.

Fronn quality was assessed by comparing the number of desirable blades out of the three sampled blades between fronds from various locations. As with blade morphology, fronn selectivity was determined by comparing the fronds available in the harvested bed before harvest to the fronds actually harvested. The proportion of fronds desirable over the entire region was then determined by using the sampled fronds from the index beds.

Biomass Estimates

The biomass of desirable kelp was estimated by multiplying the total area of kelp beds by the density of desirable fronds by the average weight of fronds harvested. The density of desirable fronds was estimated by multiplying the total fronn density by the proportion of fronds that were available and the proportion of fronds desirable obtained from the index bed surveys. Available fronds were defined as those that were at least 5.3 m in length. This definition was needed to eliminate those fronds that did not reach the surface (average depth of about 3 m) and have enough additional length to harvest (2.3 m, obtained from the average length of harvested fronds).

The variance component of the biomass estimate was obtained by combining variance estimates from the average weight of harvested fronds and the average density of available and desirable fronds.

Effects of Harvesting

Experimental Design

The goal of this experiment was to assess the impact of harvesting on kelp beds. Three kelp beds in the Craig area were used (Figure 2), and four 20 m transects were permanently established in each bed perpendicular to the depth contours. Kelp density was estimated using the techniques described above for index beds for each study plot before any treatments were assigned.

All transects were marked, numbered, and surveyed between 24-25 March 1999. After the initial survey, the experimental treatments were assigned to the transects. There were four experimental treatments, 1) March harvest (early), 2) April harvest (late), 3) March and April harvest (early+late), and 4) an unmanipulated control. Each of the four treatments were randomly assigned to the four plots in each bed. After treatments were assigned, the plots receiving the early and early+late treatments were harvested by cutting all fronds around the mean low water mark. An 8-meter wide swath centered on the transect line was harvested. The late and early+late plots were similarly harvested after sampling in April. All plots were resurveyed using the standard dive measurements on 24-26 April and 15-16 June 1999.

RESULTS

Standing Crop

Aerial Surveys

The aerial survey identified 751 distinct beds from eight regions on the west coast of Prince of Wales Island (Table 1). The average bed size over the surveyed area was 46,936 m² ranging from 415 to 886,774 m². More than 35 million square meters or 3,524 hectares of kelp beds were surveyed (Table 1). It should be emphasized that this is only a partial survey of *Macrocystis* kelp on the west coast of Prince of Wales Island. It is estimated that this survey represents about 60% of the kelp in this area. In addition there are kelp resources around Baranof Island, Sumner Strait, Kuiu Island, and Duke Island but the area of these resources is unlikely to exceed the kelp beds on the west coast of Prince of Wales Island. In 1913, Cameron (1915) estimated there are about 45,300 acres (18,332 hectares) of kelp in southeast Alaska, but only a small portion of this was *Macrocystis*.

Density Estimates

Many characteristics of kelp populations at the index beds were evaluated using the information from scuba surveys (Table 2). The selection of Port Alice was heavily biased and the scuba surveys reflect this bias. The density of plants, large fronds, and frond length were all greater at Port Alice compared to the index beds (Table 2). The density of small fronds and the number of fronds per plant at Port Alice were both within the range observed at index beds. The overall density of individual plants was about 0.34/m² (excluding Port Alice data). There were more large fronds (mean of 2.44/m²) than small fronds (0.46/m²) at all index beds. The number of fronds per plant ranged between 3.8 and 12.5 with an average of 9.3. Excluding Port Alice, frond length was relatively constant between sites and averaged 6.1 meters.

The average depth of the 4 index and 3 experimental harvest beds was 3.28 m below mean low water (MLW), ranging from 1.25 to 6.13 m below MLW. The depths at Port Alice were greater than at the index beds ranging from 4.27 to 9.45 m below MLW and averaging 7.08 m below MLW.

Frond Biomass Estimates

There was a linear relationship between the length of a frond and its weight (Figure 5). Length was a good predictor of weight, explaining 88% of the variation in frond weight. Since a plant of zero length cannot have any mass, the intercept must be zero. In this case a ratio estimate (average weight:average length) is a simple method to estimate average frond biomass from a sample of lengths. The ratio generated from the data in Figure 5 is 0.39 kg/m. The average length of fronds at the surveyed index beds was 6.11



meters, so the average weight per frond was 2.37 kg. ($0.39 \text{ kg/m}^2 \times 6.11 \text{ m}$). The variance about this estimate was 0.065, calculated using Barnett's (1991) method.

Total Biomass

The estimated biomass of kelp in the areas surveyed was 204,319,652 kg (225,225 tons) with an 80% confidence interval of $\pm 43,802,512 \text{ kg}$ (48,284 tons). Based upon the weight per unit area, this estimate corresponds to "very thin" beds reported by Cameron (1915) and the June harvest yields of Coon (1982).

Estimated Biomass Versus Harvested Biomass

The estimated biomass at both beds was greater than the actual harvested biomass (Table 3). At Pt. Idefonso, only the canopy was harvested, so the biomass below the harvest level was left. This site, however, was only 2-3 m deep, so the amount that was left was minimal. Not all of the harvested material was weighed as some fragments drifted away before weighing.

Desirable Biomass

Blade and Frond Quality

The harvest of kelp for the roe-on-kelp fishery was highly selective with both blades and fronds being chosen for high quality. According to Richard Walsh (personal communication) of Home Port Seafoods in Bellingham, Washington, the two most important factors in grading kelp blades is the overall health and the blade width. For the 1999 SOK fishery, kelp blades in the 14-16 cm size range or higher were selected relative to the blade widths available in the bed (Figure 6). At Port Alice, blade widths in the bed did not change between March and April (Figure 7), but blade areas increased from March to April, indicating that blades grew in length but not width (Figure 7). The width of blades varied between the index beds (Figure 8). Eagle Island had narrow blades with few blades wider than 16 cm. Those blades that were wider than 16 cm were often torn and broken. There was a higher percentage of both narrow (<14 cm) and wide (>20 cm) blades at Harmony Island relative to Port Alice. The few samples taken at Balena Island indicate that most blades were in the 14-18 cm range. At Port Real Marina, blades were very wide with almost all blades more than 16 cm wide, but most blades at this site were covered with fine silt or damaged by grazers.

To evaluate the quality of fronds, the three blades sampled on each frond were rated as desirable or undesirable. A desirable blade had to be at least 14 cm wide, have few small holes, no large holes, free of silt, and not torn. Virtually all of the harvested fronds from Port Alice used in the test fishery had 2 or 3 desirable blades of the 3 sampled (Figure 9), and the percentages used in these two categories were

greater than the available fronds in the Port Alice bed. In the index beds, 38.7% of blades had 2-3 desirable fronds. Most of these desirable fronds were found at one index bed.

Available and Desirable Biomass

To determine the biomass of kelp available and desirable for kelp harvest, both the density of large fronds and the weight per frond needed to be adjusted for the selection of fronds. The density of fronds available for harvest was calculated by multiplying the total large frond density by 51.25%, which is the proportion of fronds that were longer than 5.3 m. The threshold length of 5.3 m was deduced as follows: The average depth of beds surveyed by scuba in this study was rounded down to 3 m below MLS, and this length was added to the average length (2.3 m) of the cut segments of fronds harvested for the Sitka ROK fishery. That is, a frond must be at least 3 m to get to the water surface and then be an additional 2.3 m to make the frond worth harvesting. Thus, the estimated density of available fronds was the average frond density, (2.45 fronds/m²) (Table 2), times the proportion of fronds longer than 5.3 m (0.5125) with a result of 1.26 available fronds/m². The proportion of desirable fronds in the index beds was 38.7%. Therefore the density of available and desirable fronds is 1.26 available frond/m² times 0.387, equal to 0.486 available and desirable fronds/m². The average weight of harvested fronds was 1.73 kg/frond. Thus, the biomass of available and desirable fronds in the surveyed area in April 1999 was 29,631,711 kg with an 80% confidence interval of $\pm 20,161,522.8$ kg, or about 14% of the total kelp biomass.

Growth of Beds - March to April

The canopy cover within all index beds increased from March to April (Table 4, Figure 10). The percent increase in cover ranged from 12% to 311% with a mean increase of 82%. Thus, beds in March will average about 45% less canopy than beds in April. If there is a linear relationship between canopy cover and biomass, then the April biomass estimate can be appropriately reduced to obtain a March biomass estimate. Decreasing the April biomass estimate by 45% results in a total biomass in March of 112,375,808.4 kg and a desirable biomass in March of 16,297,441.3 kg.

Effects of Harvesting

Over three months there were few detectable effects of harvesting upon *Macrocystis* plants or beds (Figure 11). To account for variation in the starting densities or lengths, differences between the June sampling date and the pre-harvest March sampling date were statistically analyzed (Table 5). Average frond length was significantly lower on plots harvested later in the season compared to the early harvest or control plots (Figure 11F, Table 5). There were also marginally significant decreases in the density of large fronds and the number of fronds per plant in the plots harvested in both March and April (Figure 11C, E, Table 5). There were no detectable effects of harvesting on the densities of plants, small fronds, or juveniles (Figure 11A, B, D, Table 5).



DISCUSSION

The total biomass estimate is made up of aerial surveys of the extent of kelp beds, estimates of frond densities, and estimates of frond weight. Each of these three components can contribute to errors in the biomass estimation. Any error inherent in the aerial survey methods was not quantifiable, so the estimate of total kelp bed area was treated as a census with no error in the analysis. There may have been errors in recording the extent of individual beds during the surveys with some beds being overestimated in size and others underestimated. Also, there may have been errors in identifying *Macrocystis* beds. Some *Nereocystis* beds may have been included in the survey, resulting in an overestimate of *Macrocystis* area. Conversely, some *Macrocystis* beds may have been identified as *Nereocystis* beds, resulting in underestimation of *Macrocystis* bed area. Without performing multiple surveys over a single area, it is impossible to estimate these sources of error. A more accurate and efficient method of estimating the area covered by *Macrocystis* needs to be developed. Aerial photography from belly or wing mounted cameras using infrared film would eliminate errors in canopy area estimation and has been used in British Columbia (Foremen 1975) and in Alaska (M. Ridgway, Oceanus Alaska, personal communication).

The error estimates for total biomass were obtained from a combination of the estimates for frond density and frond weight. Frond density estimates made up about one third of the error estimate for total biomass while the frond weight estimates accounted for the remaining error. The disparity between the error contributions of frond density and frond weight indicate that relatively more effort should be devoted to sampling frond weight. A more efficient approach would be to have fewer transects per bed (about 5), sample more beds, and sample about 30 more fronds for weight and length. However, the precision of the sampling was within 22% of the mean with 80% confidence intervals, indicating a reasonable estimate of the total kelp biomass in the surveyed area.

For the two small beds examined, the biomass estimated by scuba surveys was higher than the harvested biomass. Part of this difference was due to handling the fronds in the process of weighing, resulting in the loss of an unknown amount of material. Only the canopy at Point Ildefonso was harvested, so some of the estimated biomass was left on the sea bottom. With these sources of error, the harvested biomass may have been within the range of variation of the estimated biomass. More beds need to be surveyed and harvested to determine if the scuba surveys consistently overestimate the available biomass.

Estimating the amount of kelp desirable by the ROK fishery proved difficult. The quality of kelp blades is mainly dependent upon blade width and blade health, defined by the absence of holes, tears, and debris. In addition, fronds with a high proportion of desirable kelp blades are selected over other fronds. Since blade and frond quality can only be assessed by field sampling and the estimates for the proportion of desirable kelp reflects sampling from only four beds, the precision of the biomass of desirable kelp was quite low ($\pm 68\%$). More beds need to be surveyed to make more accurate estimates of desirable biomass.

Blade morphology is dependent upon wave exposure and currents (Druehl 1978, Hurd et al. 1997), so it may be possible to predict the quality of blades in kelp beds if the exposure of the bed is known. The water flow regime for any particular area depends upon many factors including the fetch, bottom topography, local land masses, and the wind regime. It may be possible to sample blades and fronds in a variety of kelp beds varying in exposure and relating the blade morphology to a derived exposure index. The health of kelp blades also seems to be indirectly dependent upon water flow. Both grazing and fouling seems to be greater in protected areas. Waves may limit the activities of herbivores (Menge and Sutherland 1976) and prevent fouling organisms from colonizing. Thus, in very protected waters, as at Port Real Marina, kelp blades may be wide but their quality may be low due to severe grazing and



fouling. At the exposed Eagle Island site, few grazers or epiphytes were observed on the sampled kelp blades.

The canopy area of kelp beds declines in winter and reaches a maximum in late summer (Harrold and Reed 1985, Foster and Schiel 1985, Dayton 1985, Watanabe and Harrold 1991). Thus, kelp canopies increase in area during the spring months. The extent of kelp canopies increased by an average of about 82% from March to April. The canopy available for harvest in March is about 55% of that available in April. Since the Sitka Sound herring typically spawn in March, the kelp available for herring ROK is much less than that available for later herring fisheries.

The estimate of bed surface area, obtained in March, is surely a conservative estimate of bed area in April. Because the March estimate was used in the calculation of total biomass in April (using April estimates of average frond density and mass) the total biomass estimate must be regarded as conservative.

Effects of Harvesting

The effects of harvesting kelp have been examined in numerous studies. Of the studies surveyed here, five were done in *M. pyrifera* beds in California (Miller and Geibel 1973, Kimura and Foster 1984, Barilotti et al. 1985, Barilotti and Zertach-Gonzalez 1990) and Chile (Santelices and Ojeda 1984), and two were done in British Columbia in *M. integrifolia* beds (Druehl and Breen 1986, Coon and Roland 1980, Coon 1982). Of these seven studies, all but one (Coon and Roland 1980, Coon 1982) suffer serious flaws in experimental design. None of the remaining six studies were replicated and each harvest treatment was represented by a single area or bed and compared to a single control area. All but one of these unreplicated studies were guilty of pseudoreplication (Hurlburt 1984) by applying inferential statistics to replicate samples within one experimental unit. The remaining study (Druehl and Breen 1986) did not use statistics in their study and differences were judged by intuition and experience. The results of these studies are frequently contradictory. For example, harvesting kelp has shown increases, decreases, or no change in kelp growth, holdfast growth, frond production, and plant survivorship. Hence, the results must be interpreted with extreme caution.

Of the studies that examined recruitment, all found that recruitment increased when kelp was harvested. The only significant effect observed in this study was a decrease in the average length of fronds in harvested areas. The lack of significant results in this study does not necessarily indicate that there was no effect of harvesting, but may be a result of low replication of treatments. Also, the experiment has only been monitored once, two months after harvest, so any long-term effects have not been determined. This experiment implemented the maximum harvest possible under current regulations, and the lack of detectable effects indicates that the more limited harvest done by the ROK industry may have little effect on kelp beds. These experiments need continued monitoring and expansion to estimate potential long-term effects of harvesting on kelp bed and associated communities.



CONCLUSIONS

This study has provided some preliminary answers to the questions of 1) how much kelp is available and desirable for harvest, and 2) what are the effects of harvesting on kelp beds and associated communities? There appears to be enough kelp available in the surveyed area to support all Sitka Sound herring purse seine permit holders harvesting ROK with the following assumptions. There were more than 225,225 tons of kelp identified in this study. There are 51 permit holders in the Sitka Sound purse seine herring fishery. If each were permitted to conduct an ROK operation and if each harvested 5 tons of kelp (hypothetical amount based upon the test fishery), then the total kelp harvested would be 255 tons. Total *Macrocystis* harvests to support other ROK fisheries in Alaska (Craig, Hoonah Sound, Prince William Sound, and Nome) were 25 tons in 1998, and as high as 44 tons in 1992. If harvests for all of these fisheries, plus the Sitka fishery, were to occur in one season, the total harvest would still be less than 300 tons. This represents about 0.1% of the biomass of *Macrocystis* in the surveyed area. If the kelp harvests are not concentrated in any one bed or area, there is a low probability of depleting the kelp resource. In addition, the effects of the most severe harvesting allowed are apparently minimal. A more complete survey should be performed to survey all of the *Macrocystis* resources in Alaska. If a good photographic system is developed, a thorough survey should be practical. In addition, kelp density should be monitored yearly on a few representative kelp beds to ascertain yearly fluctuations in kelp density. Kelp beds often have dramatic yearly changes in abundance that are related to El Nino events (Dayton et al. 1984, 1992, Dayton and Tegner 1984, Tegner and Dayton 1987, 1991).

Increasing the demand for high quality kelp may result in conflicts among users for more desirable kelp. Of the 225,225 tons of kelp surveyed only about 14% of this kelp was deemed desirable to the ROK industry. A total harvest of 300 tons would represent about 1% of the estimated amount of desirable kelp available; however, the estimate for the amount of desirable kelp is very uncertain. The low estimate of desirable kelp is about 10,000 tons, and the maximum potential harvest is 300 tons, resulting in a potential harvest of 3% of the desirable kelp. If this harvest is concentrated in a small number of areas, as it has been in the past, users may find desirable kelp hard to locate and conflicts may occur among users. The estimate for the amount of desirable kelp needs to be improved. This can be accomplished by visiting more beds to sample more blades. It appears that the width of kelp blades does not vary at a site over the season, so a kelp bed can be evaluated at any time during the spring and early summer.

We observed few lasting effects of harvesting on kelp beds. This experiment was limited in scope and duration and should be monitored, continued, and expanded in spring of 2000. The effects of harvesting the same bed every year as well as harvesting only once need to be assessed. In addition, the effect of harvesting on the kelp bed community needs to be evaluated. Given the high growth and production rates of *Macrocystis* elsewhere (Lobban 1978a, 1978b, Coon 1982, Wheeler and Druehl 1986, Jackson 1987), it is anticipated that kelp recovery from harvesting should be completed by the end of summer for harvests in March or April.

Based upon the preliminary results of this study, there was sufficient kelp in March 1999 to support the currently proposed Sitka Sound ROK fishery assuming total harvests would be in the neighborhood of several hundred tons. Conflicts between users may occur over access to high quality kelp, but these conflicts may encourage harvesters to locate currently unused high quality beds. The effects of harvesting on kelp and associated communities appears minimal or negligible, but this needs to be verified by further research.

Open Pounds and the Traditional Subsistence Fishery

The photo below was taken during the 1998 experimental fishery. Subsistence users set their hemlock branches near the open pounds. The pounds were anchored and tied in such a way as to not impede subsistence activities from taking place. There is concern that more pounds fishing will impede the subsistence fishery but there will still be plenty of area to suit the needs of both user groups.



There are plenty of fish available to both open pounds and subsistence users. Using the 27% conversion ratio from the ADFG report, 185 tons of herring can produce around 100,000 pounds of spawn on kelp (SOK). The current amount necessary for subsistence (ANS) for the Traditional fishery is between 136,000 and 227,000 pounds. Using the same conversion for SOK and comparing to the current ANS the total amount of herring needed to meet ANS would be between 250 and 420 tons. The amount of herring required for the upper end of ANS represents less than 1% of the forecast biomass in 2015. Also, the SOK fishery would not remove additional herring from the biomass increasing opportunity for subsistence needs to be met. Put simply, there is plenty of fish and area for everyone to coexist.

Herring Spawn-on-Kelp

An Update of Market Variables Affecting Demand in Japan



Jumbo No.1 Product



Seasoned Product

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1. Executive Summary

This report provides a concise review of market and economic factors influencing the current and future demand for BC Spawn on Kelp in the Japanese market.

The world's second largest economy is undergoing 'moderate' deflation for the first time in 40 years. This was before the calamitous events of and since September 11 this year.

Key feature that will affect demand for BC Spawn on Kelp (SOK) are:

- ❖ Higher priced food products are under pressure to deliver value, quality and supply consistency
- ❖ In the face of poor economic conditions, high debt and consumer purchasing shifts, several of the major sales channel members and sectors for food products in Japan are suffering declining sales and profitability.
- ❖ Seafood consumption in Japan appears to be holding its own against dramatic increases in beef and pork sales over the past decade (at least) as Japan strives to adopt more western eating habits.
- ❖ Japan's customary gift giving seasons remain intact, but 'givers' are seeking lower priced goods and are purchasing gifts for more occasions.
- ❖ BC's SOK production remains in a market leadership position, but faces pressures to deliver more consistent quality. The US and Russia are the two countries that could significantly increase production.
- ❖ Few reproprocessors of SOK in Japan dominate the 'front end' distribution
- ❖ The total supply of SOK to Japan is relatively small and must be inventoried to permit rear round supply, resulting in limited attention to market growth in consumption.
- ❖ Price of imported SOK appears to be both a function of classical supply and demand as well as the appetite of the importers (trading companies and reproprocessors) to attain annual market share goals
- ❖ Very little if any BC or Canadian 'branding' is carried forward to the end user in Japan.

Opportunities and recommendations include:

- ❖ Japan is the market of choice for any increased BC production in future
- ❖ The market can absorb more product and if increases are modest over time, may result in minimal price declines, if any, and increased consumption across all sales channels
- ❖ Production of thinner SOK could offer an opportunity to increase sales due to higher perceived value; new production techniques may be required



- ❖ BC producers and primary processors need to improve quality consistency in concert with buyer requirements – work with the market players, they are BC's only customer!
- ❖ ROK is a relatively healthy convenience food and can be promoted as such
- ❖ A super premium quality product, fresh light brine or no brine ROK could be tested for a high end application, delivered by air freight, in-season
- ❖ The Japanese market is complex and tradition bound – don't try to outsmart the market; work with market 'partners' for a win-win strategy to increase sales and consumption, should the need arise
- ❖ Carrying forward BC/Canadian identification and possible producer 'branding' to the end-user should be investigated as both a defensive and offensive strategy
- ❖ The BC SOK industry stakeholders should consider maintaining its market leadership through supply and market expansion to avoid being beaten to the punch by Alaskan and/or Russian competitors
- ❖ Resources should be found to investigate other markets for BC SOK, as a defensive strategy.

2. Project Scope

The focus of this report is to provide an overview of the most important economic and demographic drivers of demand and consumption for seafood, and Spawn-on-Kelp (SOK) specifically, from the perspective of this consultant.

The report presents a compendium of market information to incorporate into a broader assessment of the SOK industry being proposed by E. Blewett & Associates in their assignment for Fisheries & Oceans Canada.

An extremely tight time frame permitted for this project limited the number of market and SOK production contacts and their feedback; therefore the results are presented on a best efforts basis.

Opportunities and constraints of increasing consumption of SOK are described and Conclusions and Recommendations are presented.

3. Current and Market Situation

❖ Japan Economic overview

Japan's economy has been in difficulty for some time and has just entered its fourth recession in 10 years. Japan is the world's second largest economy yet

has the unenviable record of currently having the highest public debt (which includes massive bad debts at the nation's banks) in the western industrialized world.

In March, 2001, the Government of Japan admitted a state of 'moderate' deflation of its economy, for the first time in the last 40 years.

Prior to September 11, 2001, the world's powerhouses of the US, Europe and Japan were struggling to lift out of a global meltdown. Since that time, all indicators are pointing negative.

Experts say that Japan's woes are deeply rooted; business and industry needs an overhaul, but they caution that now is not likely the time to tackle painful reforms, given the severity of the economic slump in Japan, as well as with its major trading partners.

Some significant economic indicators in Japan, relevant to this report, are:

- o Consumer prices and consumer spending has fallen for three consecutive years
- o Japan's retail industry is undergoing restructuring pressures: Mycal, Japan's 4th largest retailer, filed for bankruptcy protection in September, one of the largest corporate failures in Japan's history.
- o Job cut fears are softening consumption, particularly on high priced goods, causing an upswing in personal savings
- o Hopes for Japan's economic recovery, both broad and related to its consumers appetite for high priced goods, is closely linked to the condition of the US economy.
- o The consumer trend to a more Western diet is ongoing, particularly among the nations' young and those with higher disposable income. Many of the more traditional Japanese products (including food products), are declining.

❖ Sales channel trends

Due to the economic conditions outlined above, the retailing sector is exhibiting structural changes. Discount chains are strengthening their presence, while foreign retailers such as Costco and Carrefour are continuing their aggressive entry into the Japanese market and thus, are accelerating the severity of competition in the retailing sector.

Hardest hit have been the general merchandise sector, which includes supermarkets, which saw a 5.3% decline in total sales versus the previous year. Convenience stores are still flourishing but sales and operating profit appear to have peaked or are weakening.

In the foodservice sector, take-out lunchboxes and delis are becoming a driving force due to the changes in people's lifestyle and consistent with the savings minded Japanese consumer attitudes.

It is indicated in several industry reports (e.g. DFAIT Japan Fisheries Market Report, May 2001), weak economic conditions are seeing declining consumption at higher priced restaurants and sushi bars.

On a brighter note, there is an increasing trend to eating out dining at chains and independent restaurants specializing in 'revolving belt' sushi outlets (Nihon Shinbun Kyokai [NSK], October 21, 2001).

Japan's heritage of gift giving continues. It is customary to give gifts to business associates, colleagues, friends and family members. Some notable characteristics of gift giving in Japan are:

- ❖ Historically, the two key gift giving periods are summer season called "Ochugen" and a winter season called "Oseibo".
- ❖ Poor economic conditions have seen a decrease in terms of both the number of gifts given and their value, particularly during the winter season. Despite this trend, gift giving is still a large 'industry' (\$US 90 billion in 1999), with food products composing approximately 20% of this total.
- ❖ There is a trend to give more gifts more often (at other times of the year) and on more occasions.
- ❖ Typically, gifts are of higher quality and traditionally high image brand names have been important.
- ❖ Seasonal gifts are sold primarily through speciality wholesalers to upscale Department Stores, upscale Retail stores and speciality gift stores. Increasingly, the convenience store sector has started carrying a limited selection of gift items.

❖ Seafood consumption trends

Seafood consumption in Japan remains among the highest in the world and continues to rely heavily on imported products (\$US 16 billion), with Canada's share in 12th place (547 million, 3.4% of seafood imports).

Seafood imports by Japan will likely continue to increase in volume in future years due to declining domestic fishery and aquaculture supplies as well as high seas catches. The changing appetites of Japanese consumers for convenience foods and healthy eating can continue to be fulfilled by seafood products as producers, reprocessors and the retail/HRI sectors satisfy these demands through new product development and branding programs.



❖ Beef, pork and poultry trends

Consumption of beef, pork and poultry have increased dramatically in Japan during the past 10 years consistent with the changes in demographic makeup and an appetite for western foods. Time trends in food intake, indicate an increase in meat consumption of 13% compared to 3% in seafood consumption (1990-1997, Japan National Survey by Ministry of Health and Welfare)

The recent mad cow disease scare in Europe has spread to Japan. Short term impact is seeing a dramatic fall off in beef consumption. To date, no increase in seafood consumption has been noted (Bill Atkinson News Reports, Oct. 22, 2001)

❖ Roe-on-Kelp production & consumption trends

Production and Price trends:

- According to DFAIT/Ni-Ka Online, imports of herring Spawn-on-Kelp decreased substantially (by 32.6%) in terms of volume from 869 mt in 1999 to 586 mt in 2000. A sharp decline in imports from the United States from 329 mt in 1999 to 34 mt in 2000 was the major reason for this decrease in the total import. Reflecting the decrease in the quantity, the average import price for both Canadian and US products has recovered slightly from 1,876 yen per kg (C.I.F.) in 1999 to 2,118 yen per kg in 2000 for imports from Canada and from 1,357 yen per kg in 1999 to 2,160 yen per kg in 2000 for imports of the US.
- **Note:** there are some interpretation questions in these statistics that remain unresolved. For example, the US fishery statistics indicate production from both Alaska and San Francisco was 236 mt in 1999 and 87 mt. in 2000 (0 from Alaska). Comparing these figures to those above indicates possible carryovers in production within the US, or inaccurate import statistics. Similar analysis has not been tested in other years or for other countries production versus import statistics.
- Embassies and Fisheries Departments were contacted in countries that have prior SOK production (Finland, Iceland, Sweden, Norway, Atlantic Canada, S. Korea and Russia). Responses are as follows:
 - Atlantic Canada: Newfoundland had reserved a quota of 200 mt for 1999/2000, but reports no landings in recent years. More information may be forthcoming.
 - Russia: embassy staff report no knowledge of a fishery for this product, more information may be forthcoming, but statistics are poor, particularly for exports.



- S. Korea reports no knowledge of production
 - Finland, Iceland, Sweden and Norway have yet to respond
 - Note: time may provide insights to the lack of information, but it appears that export statistics of this product are not readily available, or perhaps non-existent due to small production quantities in these countries.
- A significant buyer of BC, Alaska and San Francisco SOK that I spoke to indicated no recent production from Iceland, Sweden, Norway or S. Korea. He did indicate, however, that:
- Finland produced 26 mt in 1999, 12 mt in 2000 and none reported to date in 2001.
 - Russia produced 42 mt in 2000 and none reported to date in 2001.
 - Russia has been encouraged to develop a fishery and has produced limited and intermittent quantities in recent years. Poor weather, ice, inadequate resources and training have impeded development of a fishery there, to date.
 - The San Francisco fishery is of limited herring biomass, so there is little likelihood of increase SOK production in future.
 - The area with the largest potential to increase production, outside of BC), is Alaska. Much of the herring roe fishery in Alaska is frozen in the round and exported to Japan and China for processing into brined roe for Japan. The prices received by herring roe harvesters in Alaska is significantly below what could be obtained if they transferred their quota to SOK. Alaskan fishery regulators would support this, but some of the existing herring permit holders are reluctant to support a conversion initiative, to date.

Consumption trends

- Due to poor economic conditions in Japan, the traditional sales channels for this product have been shifting from high-end Japanese restaurants, sushi bars and gift items to less expensive venues. In addition:
- Poorer quality product is being processed into less expensive retail packs for department store and grocery store consumption (including seasoned products) in greater quantity than the past.

- "Japanese trade people engaged in importing, distribution or processing hold that the development of the market in this direction will be the only way to increase (sales) prospects for this product in the Japanese market". (DFAIT Japan Fisheries Market Report, May 2001)

❖ Currency factors

BC Herring SOK is purchased in Canadian dollars. The value of the Japanese yen to the Canadian dollar during the time of purchase of SOK could influence the price paid in BC and the resulting selling prices in Japan (in Yen/kilo).

This consultant was not provided with BC selling prices to determine if this factor is 'in play' in price determination. However, analysis of the movement in the value of the dollar vs. the yen was tracked back to 1995 and average import prices of a number of seafood products in yen per kilo were examined:

- It appears that there is little, if any, relationship between the strength or weakness in the yen and the selling prices of a number of seafood products in the Japanese market (salted herring roe, Ikura, King Crab, Northern Shrimp).
- The highest prices in yen/kilo in Japan for SOK was in 1995; this was also the year in which the yen was strongest against the dollar, compared to subsequent years. This price effect may have resulted in higher prices paid to harvesters in BC.
- In Japan, other factors are believed to be of greater influence in determination of the end-user price:
 - supply and demand
 - market share goals of importers and reprocessors
 - quality of the annual 'pack' on average
 - 'in-market' factors such as inventory levels, disposable income, reduced demand for higher priced food products and reduced expenditures on eating out at high end restaurants

❖ Roe-on-kelp purchasing dynamics

BC SOK permit holders are restricted to an 8 ton quota. Permit holders are also required to weigh their product after brining and are given a 6% overage allowance for brine uptake.

It was reported to this consultant that a 'scandalous' practice that has gained in popularity is to obtain an official weight prior to brining, then brine the product and boost the weight. This allows the 'real' quota to be exceeded. However, to maintain maximum roe quality, the product must be brined as soon after harvest as possible. The delay in brining caused by the aforementioned practice decreases quality. It was reported that this practice is generally carried out with

the knowledge of all parties. Japanese buyers have difficulty in detecting quality deterioration due to 'sampling error' at time of inspection of sample lots.

❖ Dominance of few re-processors

Few Japanese reprocessors exist for SOK. Current information indicates that Taniya continues in a dominant position (estimated at 70%) in reprocessing and supplying to all sales channels in the Japanese market.

Despite this dominance, other reprocessors vie for market position and influence the price paid to trading companies/importers in any given year. It was reported that the major historic buyer of SOK, Taniya continues to be the major force today.

❖ Channel player health

The distribution system in Japan from raw material purchase (BC SOK) to trading company to re-processor to wholesalers and major channel players has not been simplified for this product – the health of each segment makes a difference to the operation and health of the whole.

The Japanese food retail and food services sector is both in transition and under serious price and profitability stress due to the weak Japanese economy, high debt and shifting consumer purchasing behaviour. Current reports of business failures and poor financial performance are common

Change will be the 'constant' over the near future, at least. If the sales channel members responsible for sales of SOK were to experience serious financial difficulties or were to shift their product focus, further price erosion could take place.

❖ Supply size

The supply of SOK is relatively small compared to other seafood imports and food products in Japan. This low volume characteristic results in a reluctance by channel players below and including the reprocessors to spend much time and/or marketing funds on channel expansion, regional distribution expansion or internal promotion. This relationship if further aggravated, under current economic conditions, by the positioning of SOK (BC's in particular) as a high priced/luxury product.

❖ SOK Branding

There is very little if any producer/exporter brands or country of origin labelling of SOK being carried forward to the end-user in Japan. (Note: on the cover of this

report is a photo of seasoned ROK, (Cheena brand), which shows a display window in the shape of a Canadian flag. It is not known if this product is marketed in Japan – Cheena has gift shops in Vancouver, catering to Japanese tourists).

Brands are extensively used by reprocessors, importers, food distributors and retailers in Japan that form the basis of building awareness, preference and consumer promotion activities.

4. Opportunities and Recommendations

4.1. Market Expansion: Japan or beyond?

Any market expansion strategy, in this case to expand consumption/sales, would either focus on methods to expand existing market(s) or expand current or future distribution into new markets

A marketers' primary analysis of these options would focus on cost and benefit of the alternative strategies. Typically, the cost of developing a new market(s) would be far higher, complex and time consuming (years) than an existing market.

Primary reasons to look to new markets for SOK would be due to:

- o Major impediments to market expansion in current market including economic factors (e.g. negative price elasticity which would see dramatic declines in price if supply were increased)
- o Market research that indicate probable or defined interest to purchase by buyers and/or consumers in new markets (we haven't done this research beyond a few phone calls!)

It is my recommendation to focus on the Japan market, at least in the short term, to increase the market position of BC SOK or if required, to increase consumption.

Good or bad, there is a single market 'heritage' of consumption in this market aside from limited consumption of this product in other countries by Japanese expatriates and some eating establishments and gift shops catering to tourists and 'adventurous' diners.

- o Quick investigation I did of consumption in nearby Asian countries turned up nothing (e.g. sushi bars in Korea that cater to Japanese tourists/business people do not currently offer roe-on-kelp – this despite that Korea eats many different fish roe products). Further investigation might prove this market to be of some potential, who knows!



4.2. Supply and price relationship appears to be 'economically' elastic, with limits

Information from interviews suggest that an increase in supply of uniform 'high' quality SOK from BC, if in small increments, should not see a significant decrease in prices received.

Should this be achievable, the market can be grown without negative impact on prices received by BC producers.

4.3. Supply is very small in total in a large market

Despite the current price sensitivity to higher price goods in Japan, the quantity of SOK in the Japan seafood scene barely hits the radar screen.

Some observers believe that there is plenty of room for Japan market expansion of SOK across all sales channels, including the higher priced gift and upper end restaurant/sushi bar sectors.

Further, in order to present marketing and promotion opportunities for sales channel members in Japan, increased supply would be required, particularly as year round supply is essential to retaining consumer loyalty and purchase.

4.4. Retail marketing of SOK has been limited by limited supply and price

Marketing of SOK at the retail supermarkets has been limited, mainly due to price and the margin requirements of retailers. This channel has/is being used for lower priced product and seasoned product but has hardly been touched due to high historic prices and limited supply. This channel requires consistent and substantial supply to obtain shelf space and maintain 'listing's' or 'rental space' within the store.

If an economical production method could be developed to produce SOK with thinner roe coverage, it would be possible to offer less expensive product to this major consumer sales channel.

4.5. Japan's image of Canadian food products is positive

Japanese consumers have a high regard for 'western' and Canadian products, though price and quality have become increasingly important.

In order to differentiate BC SOK, a branding opportunity is presented to identify Canadian production.



4.6. BC SOK is variable in quality

Despite quality grades set by BC processors and purchased by Japanese buyers after inspection, it was reported that quality is inconsistent within the set grade standards.

More stringent quality guidelines at time of inspection and purchase in BC could be implemented to improve quality consistency and reduce reprocessor costs of misgrades and grading in general in Japan.

4.7. Health and time-conscious consumers are increasing

Japan is tracking other western industrialized consumers in paying increasing attention to healthy foods that are easy and quick to prepare (e.g. low(er) fat and salt, microwaveable, etc.)

SOK fits the bill. It is effectively ready to eat. Brined herring roe by comparison is more time consuming to prepare and has to be soaked, washed and is typically re-seasoned prior to eating.

These features could be positively promoted.

4.8. Fresh-by-air SOK – possible?

High-end restaurants in Japan pay very high prices for the freshest products. Though I'm not aware if it has been attempted, it would be feasible to transport fresh product with little or no brine added to Japan via air cargo without suffering significant quality loss.

This would only be possible during the production season and likely for a limited quantity, but this may offer an additional 'top-end' channel to operate in (e.g. False Pass/Copper River Sockeye – the first of the season).

4.9. Don't try to outsmart this market

One might be tempted to look at expanding consumption and/or to increase price of SOK by leapfrogging the distribution system, jump in with BC producer branded product and market product directly to the highest priced sales channel.

Don't! Money down the drain.

It is my conviction that the best means to create a winning marketing strategy in a foreign land with a product like SOK, is to work with trusted 'partners' in Japan to co-devise the most sensible and cost effective marketing strategy. The plan



must be win-win for all parties if it is to succeed and may indeed require some adjusting on the production and fishery management side in BC as well.

4.10. Beat 'em to the punch – keep BC's market leadership

BC is the market leader of SOK in Japan.

BC has seen eroding market share of its once leading 'wild' seafood products. SOK is an interesting product as a wild resource is utilized to produce finished product attributes that can be controlled and manipulated similar to true aquaculture practices.

It was described to me that both Alaska and Russia have the potential to increase production of SOK, given adequate resources and dedication. This may be a 'soft' challenge. If BC doesn't rise to the challenge, someone else may facilitate the growth of our competitors.



ROK Marketing Questions and Answers

There have been market studies for roe on kelp (ROK) but the studies were completed over a decade ago. The market conditions surrounding herring roe products, both sac roe and ROK, have not changed much since these reports were written. In order to provide updated information a longtime broker of herring roe products was contacted. The following are questions and answers from the discussion:

How much of a market would be available for this “new” ROK product?

In 2004, there was an abundant supply of ROK coming out of BC/SE AK. I think in 2005 it was around 800 ton total supply. That volume was a real challenge for both seller and buyer. The sales prices were quite low and allowed for entry into new consumption markets. ROK became something that was accessible at pubs and such places versus something that was so expensive as to be served only at weddings and high end sushi bars.

New consumption channels arose and the 800 tons of supply did not appear so daunting as indeed the carryover inventory the following year was not as severe due to increased consumption.

The advantage ROK has over Herring Roe is that the image of ROK is not as heavily wedded to New Year’s season consumption. As well, the combination of kelp with herring roe seems to be more appealing to some consumers than herring roe by itself. I seem to notice more sushi menus offering ROK in a visible manner versus herring roe.

Also, the supply of ROK is much smaller than Herring Roe. The Herring Roe market is sometimes said to be around 10,000mt. The supply of ROK tends to be in the 300mt to 500mt range. Total supply is much less than Herring Roe and increasing the supply of ROK, in terms of overall supply, is a much smaller number and should be easier to deal with - especially if we are talking about ROK being a staple of the sushi market which is a very robust and successful market in Japan.

The sushi market utilizes the thinner coverage production. The sushi restaurant market in Japan is thriving. (4,010 sushi restaurants in 2014)

The one thing I would caution is, the market for raw materials to use as sushi toppings is relatively deep - but it is price sensitive.

To come back to your question, I think there is market space for additional ROK product but it will be price sensitive in the short term. I would think that as the popularity and demand for ROK increases, gradual price increases are possible as long as supply does not have the wild swings that we have seen in the past.

The large harvest of 2005 then reduced harvests in 2006 and 2007 whereby in those two successive years the price doubled each year but the market shrank to match the available supply.

Would the additional product produced in Sitka be a detriment or complement to the products currently produced in SE roe herring fisheries?



Anything that decreases the availability of sac roe going to the Japanese market would be positive for the market. Allocating available resources from sac roe to ROK should be a net benefit. We are currently going through a period of suffocating oversupply on the sac roe side. This year's ROK supply was also quite abundant, being at least double of the year previous and this has had a deleterious impact on pricing but as mentioned previously the overall volume of ROK is much different than herring roe and poses different and I would say less daunting challenges. Let's remember that the supply of ROK really only comes from BC and SE AK whereas herring roe comes from more sources and in greater volumes. (Let's not forget herring roe also comes from Atlantic Ocean sources)

Thus, even though we had a sudden surge in ROK production this season that was over double of last season's harvest the volume is still manageable with the market taking a longer term view on consumption such as 18 months versus 12 months. Once again, the scale of volume we are talking about is much different for ROK versus Herring Roe. (2014 estimated harvest: Herring Roe – 8,400mt / ROK – 600mt)

What is the long term outlook for sac roe and ROK products?

The long term outlook for herring roe is stable consumption with we would hope growth due to the available supply of herring roe. Recent history would suggest that we will not see explosive growth in herring roe consumption. Closed Pound ROK or Open Pound ROK will likely be viewed the same in the market and would be compared by current quality attributes which assign value.

Is it safe to assume that if the sac roe price increases then the egg on kelp market would also see a corresponding increase?

Although they are different products per se, there is a linkage between the pricing of herring roe and ROK since they are similar products. This year would have been a good test case to see what kind of price differential would be possible had the harvest of ROK been limited. But, it is generally thought that the pricing of the two products cannot be vastly different.

Will adding ROK in Sitka will not be a detriment to already existing ROK fisheries in SEAK.

The history of ROK pricing may make this difficult. Because the ROK market is small in terms of volume and buyers, the price is quite sensitive to volume when the volumes are limited. The past 10 years have seen some volume swings and foreign exchange movements that have led to a wide range of pricing for SE AK ROK. The current context of high volume and the comparative weakness in the yen will make it hard to take the position that additional ROK from Sitka will not soften the market further. (although it looks like there are resource issues in Hoonah, Ernest Sound and Tenakee which may make SE AK ROK a scarce commodity even with a Sitka ROK fishery)

The market will not be taken away. There is room for market expansion, although the near term impact may be lower pricing until the market adjusts to the increased volume.



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TO WHOM IT MAY CONCERN

Subject: Sitka Sound Roe Herring Open Pound Fishery

I have been invited to provide testimony on the subject of SOK production in Sitka Sound. I would consider it a privilege. It is my sincere hope that the views expressed here may promote healthy discussion and perhaps, lead to the adaptation of policies which will benefit all in the industry.

I have been involved with SOK for the past 20 years. During those 20 years, my company has gained valuable knowledge and experience into the workings of the SOK market. In 1999, we purchased 260 tons of SOK from California, B.C., and southeast Alaska, including Sitka.

It is my understanding that if the full potential of roe herring is utilized, Sitka may one day become the leading SOK-producing region of the world. I have heard concerns expressed that such increase in supply would disturb the delicate balance of supply-and-demand and produce a negative impact on the already fragile market, and bring hardship to the existing permit holders of SOK. These are legitimate concerns and one must not take them lightly.

However, I am of the opinion that, reducing the supply to keep the price up can work only under certain market conditions - but not now. In the present market climate, it will only mean repeating the same mistake that already has led the SOK industry to its current predicament.

To explain further, first let us examine the reasons for the current downturn in the SOK market. In my opinion, the present difficulty is in large part due to reaction to excessively high prices of the past.



To elaborate on this point, I have attached two graphs following.

The dollar values used are the mean average prices for closed pound SOK from B.C. They show a dramatic price increase that peaked in 1995, only to be followed by an equally precipitous price drop, which continued unabated to 1999. The expression, "Where the mountain is high, the valley is deep", encapsulates the essential behavior of the SOK market.

Graph 1 shows the combined supply of SOK from all the North American production areas. Here the rising prices up to 1995 seem to correspond with decreasing supply. In the same token the declining price curve from 1996 coincides with increasing supply for that period. Here, a superficial examiner of this graph may jump to a hasty conclusion that this is the evidence of increased supply driving down the prices. However, he must be cautioned not to be so hasty.

Graph 2 shows same price curves. However, it is different from Graph 1 in that it shows only the closed pound production from B.C. and southeast Alaska. Here the supply of thick product was fairly consistent through the same period of great price upheaval. Granted, there was a sizable supply increase in 1997. However, during the years that followed the declining price curve continued despite supply reached a plateau. It is reasonable to conclude, then, that it was not the over-supply that affected the price of SOK, but some other factors were at work.

The single most important factor that has been driving the price down, in my opinion, is the economic recession in Japan. During the bubble economy years that lasted until early 1990's, Japanese consumers displayed great appetite for luxury. Consumption of expensive foods, including SOK, rose to record levels, and as those commodities became objects of speculation, the prices soared. But as the bubble burst, realities of economic recession set in, and the consumers backed off.

Take for example the kazunoko (herring roe) market. Despite the fact that the 1999 supply of kazunoko was the lowest in twenty years at less than 10,000 tons, the year-end gift kazunoko market plummeted. Conversely, lower-priced kazunoko in the form of consumer pack fared relatively well. Total consumption appeared to have been at par with supply.



The same situation manifested itself with SOK. Movement of thick SOK (jumbo & No.1 from B.C. and Alaska) was extremely sluggish, and the prices were down to record low levels. Thinner product, on the other hand, sold well, because prices were low enough to appeal to consumers.

These examples show that the market is constantly evolving, and that how important it is to stay in tune with the consumers' needs.

There are four main ingredients to successful marketing. They are:

- Healthy demand
- Consistent supply
- Reasonable price
- High quality

Of these, a healthy demand has to be ranked as the highest importance. If the high prices of recent years have alienated the consumers away, what the SOK industry must accomplish now is to find way to recapture the lost customers and generate new demand. Aside from making the product more appealing in terms of both price and presentation, the key is to make SOK accessible to a greater number of consumers. The task of generating demand is not a difficult as it may seem. For SOK possesses inherently superior product appeal. For instance, nine of ten people who actually tasted SOK will show a decided preference for SOK over kazunoko. This is an evidence enough that there is a huge potential for an untapped consumer market for SOK.

However, the size of the market can only be as big or small as the volume of supply. In this sense, the very limited supply that gave SOK the exclusivity in niche market is a fundamental weakness that prevent it from acquiring wide popularity. This point is clearer when one compares the supply of SOK against herring roe. In 1999, the total supply of herring roe was 10,000 tons, while SOK was just over 500 tons, barely 1/20th of kazunoko. This means that only a very few consumers had ever tasted SOK. Indeed, the majority of Japanese are even aware of its existence. The solution, then, seems to be to increase supply, while maintaining reasonable price and quality.



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To this end, proposed alternative harvesting in the form of SOK in Sitka can make a significant contribution, especially if the open pound method is used. In the market where thick product by closed pounds dominates, thinner product by open pound will provide just enough diversity. It is possible that, instead of competing, producers of open pound and closed pound SOK can complement each other. By having the ability to offer rich variety of product, the SOK industry collectively will enjoy a greater chance of success in the task of opening wider market, and cultivating the greater demand in the process.

In conclusion, I believe that, if managed properly, open pound SOK fishery in Sitka Sound offers a promising alternative for better utilization of available resources. Even though critics may have legitimate reasons to worry about the over supply, benefits far outweigh the detriments. Perhaps, in consideration to existing permit holders the initial quotas should be set at a moderate level, but with mechanism to increase gradually as more demand is generated.

Thank you for the opportunity to voice my opinion. It is my sincere hope that the new management plan for SOK in Sitka Sound will be formulated with the greatest care for the future benefit of all.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Ed Furumori".

Ed Furumori



February 9, 2015

Alaska Department of Fish and Game
Board of Fisheries
PO Box 115526
Juneau, AK 99811

Dear Board of Fisheries Members,

RE: Comments on March Statewide Finfish and Supplemental Proposals March 8-11, 2015

Petersburg Vessel Owner's Association (PVOA) is composed of almost 100 members participating in a wide variety of species and gear type fisheries. An additional thirty businesses supportive to our industry are members. Our members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, cod, crab, and shrimp.

PVOA's mission statement is to: "Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat."

Proposal 203: Support

If a hatchery is concerned they will not obtain their brood stock or cost recovery they should be able to close it to both the sport and commercial sectors by emergency order. We believe that the number one priority should be ensuring brood stock and cost recovery goals are met to ensure hatcheries remain sustainable. Currently, the Alaska department of Fish and Game is limited and cannot close a special harvest or portion of it area to all users.

Proposal 209: Oppose

PVOA supports the Department in their current definition of Herring. We are opposed to changing their designation to a forage fish due to our concern that it would affect the department's ability to manage the fishery. It is our understanding that the term "forage fish" is meant to designate species without a management plan. The department has management plans with data and history for the herring fisheries in Southeast Alaska. For this reason, we don't think it would be appropriate to re-designate herring as a "forage fish."

Proposal 210 and 211: Oppose

We contacted all of the processors in Southeast currently buying herring and none of them are making fish meal from it. However, we are still opposed to this proposal. If making fish meal allows a processor to use and profit off part or all of a herring or any other fish that would otherwise be wasted we don't want to limit their ability to use it.

These proposals are concerned that fish meal will be used to feed fish farms, which are not allowed in Alaska. There are currently several other uses of fish meal in Alaska including dog food and fertilizer for gardens that could be limited if this were passed.

In an unfortunate circumstance where fish spoils, for example from refrigeration issues, and it is not fit for human consumption processors could still benefit from making fish meal from it. It would be a lower value product, but better than the herring alternatively being wasted.

Proposal 216: Support

PVOA supports this concept. If the Department determines there is a harvestable surplus of walleye Pollock in Southeast Alaska we are in support of allowing the Department and fishermen to benefit from the management and catch of it.

Thank you for your time and considering our comments. Petersburg Vessel Owner's Association met as a group to debate these proposals and we feel these positions are best for the industry. Our organization is always happy to answer any questions and can be reached at pvoa@gci.net.

Respectfully,



Megan O'Neil
Executive Director



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER



PC 16
1 of 79

Commercial Fisheries Entry Commission

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January 8, 2016

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

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As I indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

After due consideration, the Commission has decided to take no further action on the proposal, as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.

When the Entry Commission considered a petition to limit the pound fisheries in Southeast Alaska in 1994, ADF&G Commissioner Carl Rosier sent us a memorandum regarding the Department's management and conservation concerns with the fisheries in the Hoonah Sound and Craig/Klawock areas. The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two



smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you have any questions regarding this matter.

Yours Truly,
Commercial Fisheries Entry Commission

A handwritten signature in blue ink, appearing to read "Bruce Twomley".

Bruce Twomley, Chairman
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)
Sitka Tribe of Alaska
Southeast Alaska Seiners Association



CFEC SITKA SOUND PURPOSED REG.

**Moderator: Bruce Twomley
November 6, 2015
7:51 pm CT**

Operator: Ladies and gentlemen thank you for standing by. Welcome to the CFEC Sitka Sound Purposed Reg conference call.

During the presentation all participants will be in listen-only mode. Afterwards we will conduct a question and answer session. At that time if you have a question please press the 1 followed by the 4 on your telephone. If at any time during the conference you need to reach an operator please press star 0. As a reminder this conference is being recorded Friday November 6, 2015.

I would now like to turn the conference over to Bruce Twomley. Please go ahead sir.

Bruce Twomley: Thank you operator (Kalimer). This is Bruce Twomley and I'm the Chairman of the Commercial Fisheries Entry Commission. We are in the conference room of the Commission's offices in Juneau. As you noted it's Friday, November 6, 2015 and the time is 3:00 p.m.



This is a public hearing on CFEC's regulatory proposal to modify CFEC's administrative area definition for the Northern Southeast herring spawn-on-kelp pound fishery.

Now I'd like to introduce fellow staff members sitting here with me. I have my Co-Commissioner (Benjamin Brown). We have our Law Specialist (Doug Rickey) and we have Head of our Research (Craig Farrington). And we are the folks in response to your testimony who are likely to be asking you questions. And so as we go forward if someone has a question if you'd just get my attention I'll acknowledge you for the record and so they know who's speaking.

Also before we begin I really want to extend a thank you to (Randy Lippert), (David Pierce), and (Ty McMichael) for helping make this work. You guys have done a splendid job. And we are also grateful to GCI and particularly (Julie Pierce) who has helped us through this process.

Now before we begin taking testimony I wanted to say just a few words about the procedure and our regulatory proposal to remove Sitka Sound from our administrative area of definition for the Northern Southeast herring spawn-on-kelp pound fishery. I mean, as you know, earlier board proposal 126 asked the Board of Fisheries to authorize open pounding as an alternative means for the Sitka Sound roe herring fishery.

Now proposal 126 is not at issue in this proceeding but it certainly was the catalyst for this proceeding and our proposal - the trigger that led to this hearing. And you'll notice that CFEC's proposal in front of you says nothing about proposal 126. Our proposal addresses only our area definition. And I wanted to tell you that we made this proposal for two reasons. And the first is that we were asked to do so by the Board of Fish and by the Department of



Law. And that's unusual but that request had a certain amount of force. We like to be good colleagues and cooperate where we can. But there's a second reason and that's actually what prepared us forward to make this proposal.

We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 - Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries. And it further says that the Commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of the Limited Entry Act.

So, I mean, for us the question that was raised was why did we define the area for Northern (rolunt) kelp to include Siska Sound in the first place. And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that. And of course the managers of Sitka Sound have never told us that they wanted to invite more participants in that fishery. It seems that there are plenty of demands there now.

And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute. We just didn't have a stated reason for having included Sitka Sound in that definition. And so we made this proposal and maybe you folks through your testimony can provide us with a sound reason for maintaining the definition or maybe not. It will - much of that will turn on your testimony.

But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126. And please note that however - whichever way CFEC decides on our proposal the Board of Fisheries could still take up proposal 126. And if the Board were to act favorably on proposal 126 then



CFEC would have to review the Board's action for consideration of whether the Board's action was consistent with the purposes of the Limited Entry Act under Alaska Statute 16.43.4112. And the basic purposes for a Limited Entry that we'd have to have in mind are that Limited Entry is intended to serve conservation and prevent economic distress among fishermen and those depended upon them for a livelihood. That's the most basic standard we work with.

And another thing to keep in mind is that the Board has means and methods authority under Alaska Statute 16.05.251. In turn, the Limited Entry Act governing us Alaska Statute 16.43.950 declares -- and I'm paraphrasing -- nothing in the Limited Entry Act limits the powers of the Board of Fisheries including the power to determine the legal types of gear.

So the short of this proceeding is if the Board in the future acts favorably on Proposal 126 the Board's action will need to come back to CFEC and CFEC will have to determine whether the Board's action is consistent with the purposes of the Limited Entry Act to give it effect.

And so that's when CFEC will be called upon to address the merits. If this does come back to us of course you will all get notice -- anyone interested will get notice -- and have an opportunity to address the merits as well.

So I think we're ready to move forward with your testimony. And if you have questions I'd like you to raise the questions while you are testifying. And we're going to start first with a testimony of people who have traveled here and who are here in this room to testify to us. When we get through your testimony then we'll turn to the people who are lined up on the phone to give their testimony.



From the numbers we're not overwhelmed. I don't think we need to impose any kind of strict time limits on testimony. But I think as a courtesy I'd like to ask you to please try to limit your testimony to 10 minutes as a courtesy to all of the participants in this proceeding.

And with that I think we're ready to go forward. So I'm going to begin to call people in the room in the order in which they signed up and the first of whom is (Michael Pilling). And if you could please come join us in this chair (Michael).

(Michael Pilling): Hot seat.

Bruce Twomley: Yes.

(Michael Pilling): So I'm (Mike Pilling) from Juneau and I've been fishing row-on-kelp since the early '90s both southern and northern and my wife as well. We fish Northern Southeast before Limited Entry but we did not get Limited Entry permits because the way the cards fell. So we both purchased permits. We both made an investment in the fishery.

And the reason we're here I think is basically because the sac roe fishery prices are depressed. The markets depressed for a couple of reasons. One is the strong U.S. dollar and that's hurting every one of our fisheries in the state right now. We - there's not a lot that we can do about that as fishermen. But the other reason sac roe is depressed right now is the volume - the sheer volume that the sac roe fisheries are - the quotas lately, you know. Between Sitka and (Togiak) it's nearly 40,000 tons. It's pretty unprecedented. And with that they've impacted - just because they're quota is so big they've - it's hurt their own prices. They've produced more than the market will bear currently. Japan's market is limited just like our row-in-kelp. It's a pretty fixed number.



There aren't too many new people that are - young people that are buying it. This product is a very limited small - especially row-in-kelp - it's a very niche market. And since they're catching more and more and more between (Togiak) and Sitka they (perk) they're own.

Sitka this year they were able to -- in an unprecedented way -- coop their fishery before the fishery even started. They've cooped for years to catch the last remaining ton but this year before they even started they formed a cooperative so they could maximize their fishery. And in my belief if they wanted to maximize - if they have the ability to do things cooperatively they should maybe take less fish and increase the market demand. I'd fish Sitka for maybe 10 years as a crewman over there in the late '80s and '90s our quota in Sitka was 3000 or 4000 tons and we got \$2000 a ton. And now - and everybody did really well. It was a very competitive fishery but it was worth a lot of money because we didn't put a lot of product out there.

And it's a simple supply-and-demand. Farmers go through it. Everybody that produces anything - manufacturers go through it. You just don't keep making more than the market wants. So if they wanted to - in that proposal, the person that wrote this said he wants to increase - he can increase the demand for low-end - the market for low-end (shelf). But if he has that ability to make - be a great marketer they should learn how to market sac roe because they've got a lot of it.

So whenever we've had extra product - meaning that when we fish when Earnest Sound and Tenakee were opened as well as Craig and (Una) Sound we've done the same thing to our markets. We've caught too much, we've produced too much, and we usually take a bath for about two years because we have too much that season and then we have hold-over for the following year.



So they did this - they're doing more than a boundary issue. It's really a gear group issue. They're doing what we do and they're definitely going to depress our market because we're very limited as well. And I can see it will open up a can of worms. All of us that fish Craig where there's a lot of herring what's to say when the sac roe market looks really good why - we'll be here a few years in asking you -- you same people -- why can't we fish sac roe and Craig? Or why can't the bait herring fishermen - they want to turn their fishery into a sac roe fishery because it's worth more. So if you start switching gear groups I don't believe that's why Limited Entry was put together.

So that's basically what I have to say (on Sitka). That's it.

Bruce Twomley: (Mike) if you can hold on a minute. Anybody have any questions for (Mike)? Okay if not thank you for your testimony.

And I've got - second on the list I've got (Larry Demmert).

(Larry Demmert): Hello. I'm (Larry Demmert). I am a current roe-in-kelp permit holder in both areas. And I was a Sitka sac roe permit holder for 17 years. I just sold my permit this year.

I believe if you do this - well I guess my first question is you say it's about a gear change. Is the gear change the same as the product change? Because you're doing a different product. In Sitka you're doing sac roe right now. You aren't doing roe-on-kelp. I don't know who the attorney here is or the legal person but can you change the product form legally through this? That - well that's gear site. But product form's the same thing?



Bruce Twomley: I know you've got three lawyers and you've raised an interesting issue and it's one that we haven't been called upon to address before.

(Larry Demmert): So I just wanted to put that out there. Okay in my view you will put two fisheries out of business -- the Northern and Southern Southeast roe-on-kelp fisheries -- if you do this that will cause severe economic distress and permits will be worthless. You know, and that's - Sitka's in the Northern Southeast roe-on-kelp area as you have stated. My question is is this what Limited Entry's supposed to do? To allow one Limited Entry fishery to change gear type -- gear and product type -- to eliminate two other already established Limited Entry fisheries? Okay? That's very key in my view.

I'd also like to point out Mr. (Kapp) does not have a license in either fishery. We have everything to lose and he has nothing. There is no daily consumption market for roe-on-kelp. That's the market they're talking about. They tried this 20 years ago when they did an experimental fishery in Sitka with roe-on-kelp. And the markets aren't there. Low-grade kelp will kill the market. This will cause market saturation. The price drops to \$1 to \$2 per pound and per product exceeds one million pounds, okay? This happens with the existing fisheries we already have in Southeast Alaska and Canada.

In Canada they have a huge - potentially huge fishery that could saturate the market just with their fishery but they don't do it. Only about one-third of the permit holders there actually do participate in the roe-on-kelp fishery because of the price - depressed price of the fish. And the existing - the management plan shows the prices, the fluctuations, and the price rep is only \$2 a pound. We have to pay \$2 a pound to process the stuff. If we're getting paid \$2.95 a pound we only get 95 cents a pound at the end product - to us. And this is a very labor intensive fishery and the 95 cents a pound is not really worth it to do.



San Francisco has a kelp fishery that could be as much as what Sitka does and Mr. (Kapp) had a permit there. I don't know if he still does. And still yields the same low-grade product as what they're talking about Sitka would yield. And they don't - I already talked about Canada and the older generation that eats this stuff. And it's the same reason the sac roe markets are not - they're all dying off.

The younger generation is eating McDonald's. They're eating non-traditional food. That's why 30 years ago consumption was much more than it is today. You had fisheries all over the place. You had (Prince William) Sound which is a huge roe-on-kelp fishery. You had one in California, you had fisheries in Washington, and you had fisheries in Canada. And they consumed millions of pounds of the product. They don't do that anymore. The market is about one million pounds and every time we get close to that the price drops significantly.

In Canada their permits are on a poundage per permit. Currently it's 16,000 pound permit. They have 60 permits and that would be enough to more than fill the market demand. And that does not include any tribal effort in Canada which they do have that now. As I said before sac roe's in the same boat. Their older people are dying off. The older generation that ate it is dying off so they are not eating it as much.

You know, if Mr. (Kapp) wants to develop these markets he should buy our product and develop the market for existing kelp - low-grade kelp that we have. You know, I mean the kelp is out there. It's - we don't just produce high-end jumbo product. You know Hoonah Sound does. Craig does not. And Craig is the only fishery that's consistent in the past five years. Hoonah Sound hasn't opened in several years. And Tenakee is real hit or miss.



In 1996 the price collapsed from \$20 per pound average in the Southern Southeast area to \$6 per pound. And further collapsed at \$3.29 average in '97 and stayed between \$2 and \$5 per pound until 2006. So going on nine years it stayed in very, very low, low profit area. It then increased to a modest \$12 a pound in '07 and then back down to \$10 a pound in '08 and then collapsed again the following year due to a large kelp harvest in Southern Southeast and Northern Southeast.

And recently the price increased to \$12 a pound last - two years ago. And it fell again to \$5 to \$6 a pound this year. And again we have to pay \$2 a pound to process so we're looking at only \$4 a pound for us. If you add more product to the market it's going to be \$1 to \$2 a pound.

So that's pretty much all I have except for - well all I have. And the main question I have is are you able to do the - change the product form versus the gear type?

Bruce Twomley: And that's a very good question. And it's one we don't - it's one CFEC doesn't have to face this round. If it comes to back to us on (demerits) we'll definitely have to face it and we'll certainly be thinking about it as we go forward.

And let me see if anyone here has any questions for (Larry).

((Crosstalk))

Bruce Twomley: And on that same subject and about, you know, is the gear substitution the same thing as the product form substitution. But the dollar - as I was writing down dollar amounts as you giving us between sac roe...



((Crosstalk))

Bruce Twomley: ...roe-on-kelp I understand enough to know that, you know, roe-on-kelp is a lot more valuable than sac roe at least down at a, you know, pound level.

(Larry Demmert): It can be. I'm going to say that.

Bruce Twomley: Yes it depends on the year and - so I was just going to maybe get your, you know, sort of opinion I guess as to the difference in the value. I think there's a lot of difference in the value.

(Larry Demmert): Well I didn't think of a - I take it off the top of my head at \$150 a ton and 10%. You have 200 pounds of sac roe per ton for \$150. So it's a little bit less than a dollar a pound. And then roe-on-kelp when you have the flooded market we're at 90 cents a pound. And if you were to have a fishery in Sitka that produced 200,000, 300,000, 400,000, and 500,000 pounds of product plus the other areas producing what they produce it's going to be back down to \$1 or \$2 a pound. And all this is in the (ADF&G) Management Plan. In the very back it has all the prices and I was actually surprised that for a nine-year stretch we were so low in price.

I didn't realize that it was so bad even though I did the fishery. I mean, there's not a lot - I mean, on bad years there's not a lot of difference. And actually it's just this year - the last couple years, you know, sac roe used to be tied to 600 bucks a ton. So at that point you're looking at \$2 a pound for the sac roe. And when its a thousand bucks a ton, you know, it depends if you pack the stuff in yourself or not. You know, we used to do that when I used to fish it but then you're looking at, you know, even more per pound for the roe product.



So and then sac roe produces - and one thing Mr. (Pilling) didn't include was the Canadian sac roe harvest which is - they only take half of the product there. They could take their whole quota and it would just totally depress the market. Apparently they were smarter than our fishermen because they don't take it all at once.

Their product - their quotas down there were 36,000 tons for sac roe this last year and they only took half of the product. So the Alaskans took everything they could get and that's why I got out of the business - because it's not making money at the time. So I just (suggest that) if you aren't making money change fisheries. (Don't) try to get somebody else's - reach your hand into somebody else's pocket and take out of their pocket.

Bruce Twomley: Any further questions? Thank you (Larry).

((Crosstalk))

Bruce Twomley: And next on our list is (Nick Demmert).

((Crosstalk))

(Nick Demmert): My name is (Nick Demmert). I've been a Northern and Southern Southeast (pawning) permit holder for Northern for about 11 years and then Southern for 15. And then - can I start?

Bruce Twomley: Sure. Please.

(Nick Demmert): Okay. I'd like to start by saying I'm all for innovation in the fishing industry with quotas changing (unpredictable) prices. Innovating new methods to harvest from the ocean seems to be really our only option moving forward.



With that said the flaws in Proposal 126 can't allow me to support it. First, I don't like the idea of a non-resident, non-permit holder proposing an idea that has the potential to ruin the existing market. This not only invites someone in who potentially doesn't know the inner workings of the fishery but invites them to amend the whole fishery without any consequences both for this fishery and others moving forward.

Secondly, the Proposal 126 suggests taking Sitka Sound as a harvest area for Northern Southeast roe-on-kelp and giving it to Sitka sac roe permit holders which is a different fishery. The Northern Southeast roe-on-kelp permit holders don't stand to gain anything from this proposal and yet they are the ones invested in this fishery not only with the state but with CFEC.

Establishing a new market for thinner roe-on-kelp doesn't work it has a potential to flood the market making closed pounding in both Southern and Northern Southeast see a huge drop in an already low price. If the newly established market does work then the herring (fawning) permit holders don't stand to see the benefits. Benefits would be seen by a fishery that has already seen its fair share of problems. An example - dwindling price, whether or not to go equal split, issues with the tribe, and potentially create more issues by involving a new means of harvesting herring roe in that area.

Proposal 126's attempt to fix the volatility of the roe-on-kelp market by establishing a new market for a lesser grade product seems poorly planned. I would like to see an established demand and market for the style of roe-on-kelp backed by research before we create the supply. Rather than potentially putting more lower grade roe-on-kelp on the market why not buy our existing low-grade roe-on-kelp from existing permit holders. This not only lowers the



overall supply but if the new market for lower grade products are effectively established it substantially increases the demand.

From an environmental standpoint Proposal 126 seems like a poor alternative to the existing fisheries as well. Open pounding is already an option in both Northern and Southern Southeast. Although in the long-run it is a more sustainable option simply adding a new area for harvesting roe-on-kelp isn't going to decrease the number of closed herring pounding in the existing area.

Fish and Game has already poorly managed these fisheries by enabling too high of a leaf count when there hasn't been enough fish in these area. An example - Hoonah Sound or (Erna) Sound in 2014. If anything we should be harvesting less roe-on-kelp, creating less of an environmental impact, increasing the quality of the product that is on the market, while decreasing the overall amount thus decreasing market volatility and driving the price up.

As a Northern and Southeast permit holder I stand to gain nothing from this proposal and yet I am the one invested in fishery not only with the permit but with my fishing gear and my time. Although the market has been up and down Northern and Southeast herring pounding by itself has paid for my college education, my first car, and helped me gain entry into other fisheries. I've been to Japan from Tokyo all the way to Hokkaido multiple times in attempts to set up direct markets without consequences to other fishermen.

Having both the Northern and Southern pounding license for over 10 years I stand to lose profits from both permits if this proposal floods an already dwindling market with low grade roe-on-kelp. I understand that this isn't the goal but as a permit holder I don't want to be the one taking a risk for someone else's potential gain. That's it.



Bruce Twomley: Thank you. Let's see if there are any questions for (Larry) - for (Nick). No. Okay. (Nick) thanks very much.

And that brings me to (Mike Bangs).

(Mike Bangs): For the record my name is (Mike Bangs). I live in Petersburg and I fish the roe-on-kelp fishery in both the Northern and Southern areas since they - since the fisheries began. And although the proposal before us through CFEC doesn't really have anything to do with the change of the gear type. It does - we all know where it's going. It's obvious that the reason for it is to change the sac roe available permits to some sort of roe-on-kelp.

And after being in this fishery for a long time we've really tried hard to develop new markets and to not much success. And I think it's been said by these gentlemen that it will have a big impact on our fisheries if we introduce anymore product. And I think it's been our goal to try to figure out how to produce less and increase the price. And when you add more it's just like, you know, growing apples. If you produce too much your price goes down. It's supply and demand as was said earlier.

But a big part of this that bothers me the most is that I was lucky enough to get into fisheries at the beginning and I didn't have to purchase a permit. But a lot of these permits were bought by people that had the intention of buying into a fishery that had a limited amount of permits. And now there's an opportunity possibly to add more permits. And I think CFEC does its diligence in making sure that there's the correct amount of permits given for an optimum amount of people in any given area.

And when we first started doing Hoonah Sound there was no Tenakee. And I think the reasoning behind the whole Northern area was that if there's other



fishery capabilities to have a roe-on-kelp fishery in another part of that district that it would spread this number out possibly making a better environmental impact on the herring stocks. And Tenakee's been a hit-and-miss like Mr. (Demmert) said. But I think it's unfair to the people that bought into this fishery and was under the impression that that was going to be the only amount of permits available.

And when you look at the amount of people that are involved in the roe-on-kelp fishery there's - between the Northern and Southern section there's about 278 permits. And that's going to affect a lot of people and a lot of crew. So I'm really wondering the validity of this proposal to develop the new market when it's obviously not a given developing a new market for herring roe products of any kind.

It's the same thing as what they said too as far as the younger people aren't consuming it like the older people. They'd rather eat a Big Mac or something, you know. So we've got this demographics change in population age group that don't eat roe-on-kelp. So I'm definitely against this changing and taking this area away from the Northern section because it's going to affect not only the Northern section but the Southern section.

And if any of these people want to fish roe-and-kelp they should buy a roe-and-kelp permit. It's as simple as that. There's permits available. I don't think they should be trying to get into a fishery that would affect all these other permit holders. I just don't think it's fair.

So anyway I don't want to be redundant but those are some of the points that I think are important to think about when changing area - statistical area from one user group and then giving it to another one.



Bruce Twomley: (Mike) you've been with us a long time. Is there any opportunity for expanding the market?

((Crosstalk))

(Mike Bangs): It is good product but we've tried domestic markets, we've tried more markets overseas. I mean if Chinese would eat it we'd be in there but they just aren't interested. We sent samples over there and they're just not an easy market to tap into. In Japan where most all of it goes it's very tightly controlled. And it's kept at a minimum and like testified earlier about the strong dollar that's got a big effect too. But to develop markets, like I say, we've been - over 20 years I've been trying to develop markets. We've tried West Coast brokers, markets up and down the coast, and it's just not an easy sell.

It's just one of those products that - and when it comes to - like they're going to develop this market for a lower grade well I'll tell you we can produce -- and we have produced -- a lot of lower grade product. Not by choice but that's - it happens. And so, you know, there's plenty of that market being filled by the existing pound group.

Bruce Twomley: Let me see. Any questions?

(Benjamin Brown): And it's your belief...

Bruce Twomley: (Benjamin Brown).

(Benjamin Brown): (Benjamin Brown)...

((Crosstalk))



(Benjamin Brown): ...commissioner, for the record. It's your belief that this would be harmful to the existing Northern and Southern...

(Mike Bangs): Oh definitely because it's the same - we're using the same processors, we're using the same markets. I mean, it's - and a lot of the product is similar. And it's just supply and demand.

(Benjamin Brown): All right. Just because that - I just want to be clear about that.

(Mike Bangs): Yes.

Bruce Twomley: Any further questions? Thank you. Thank you (Mike).

And that brings us to (Don Spigelmyre).

(Don Spigelmyre): Good afternoon. I'm (Don Spigelmyre). I'm with Icicle Seafoods. We do a lot of the custom processing for the roe-on-kelp. And I'm not going to beat a dead horse here but (Larry) and (Nick) (Demmert), Mr. (Pillings), and Mr. (Bangs) basically said everything I wanted to say. If we bring in low grade roe-on-kelp to the market it's going to collapse the market. There's only so many buyers for this product. It just doesn't make any economic sense if we want to keep this fishery viable. You know, all we do - we basically do the custom processing and we send it across overseas.

So - but I see the stuff come in and with the Canadians they kind of restrain themselves. They could easily flood the market as well. So, you know, my concern is if we do this and we the Canadians see that we're going to try to put more low grade on the market they're going to do the same thing and they're going to - it could collapse (rock it completely).



Man: What causes the Canadians' constraint now? Just good sense or...

(Don Spigelmyre): I think its sense. These guys have been in a lot more - longer than I have but I think it's just, you know, just sense trying to keep the price up to where it's at so it doesn't drop to \$2 or \$1.50.

((Crosstalk))

Bruce Twomley: ...that would like to be called on? (Larry)?

(Larry Demmert): I forgot to say that a permit in Canada costs \$20,000 a year to renew for roe-on-kelp. That's probably part of the problem to them doing it is they're only getting \$2 a pound and it costs them \$20,000 to renew. They're getting \$32,000 worth of product. It's not worthwhile.

(Don Spigelmyre): I just didn't want to bypass the opportunity to speak.

Bruce Twomley: I'm glad you did. Any questions for (Don)?

Man: No. Thank you.

Bruce Twomley: Thanks very much.

And that brings me to (Brannon Finney).

(Brannon Finney): Good afternoon. My name's (Brannon Finney). I'm also from Petersburg and I'm here representing myself and several other Northern and Southern roe-on-kelp permit holders. We've all been in this industry for at the least seven years. I've asked my colleagues what their concerns are and it seems like unanimously we have two major fears: the fear of our market -- of losing our



market -- and the fear of losing our own personal investment. Like (Mike) said although 126 isn't on the table I think we all know that that's the end game. So I'm going to speak on that anyway.

Although I feel for sac roe fishermen whose market is clearly suffering our own market is fragile at best. We're struggling to find a demand for the product that we're already producing. Changing sac roe permits into roe-on-kelp permits isn't going to make anyone better off. We feel like involving more permits will just serve to collapse the roe-on-kelp market as well as the sac roe market. I'd also like to reiterate what Mr. (Demmert) said - they are two completely different products so who knows if this even has any weight.

We also feel that when we have to redelegate a piece of our permit that we've invested in. We bought a Northern kelp permit with Sitka included in it. The row-on-kelp fisher has been tested in Sitka before years ago but deemed unviable due to the strain that was put on the market.

Still that has remained a possibility to pursue at a later date for us, the people that invested in this fishery. (Yet in a way) the sac roe fisherman removes the profitability. Sitka although not available to fish to us recently is included in the price of our permit which each - when we each bought them. Taking this area from us will not only collapse our market but deteriorate the value of our permit.

Going forward we urge you to deny this proposal because we see it leading to the passage of the Proposal 126 which we feel will simply collapse two markets at once. If anything we feel we at least have the right to participate in this new Sitka area fishery if that is what's going to happen.



We are existing and established permit holders who know the best way to harvest this product to promote sustainability and economical advantage. If you are still going to consider this change then I feel we should have the option of being bought out of our permits since this change will inevitably lead to the passing of Proposal 126 and that our permits will be all but worthless after this change.

One last note is that if we just start chopping up areas of permits with the intent to create more permits it makes me reconsider investing in any Limited Entry permit at all.

Bruce Twomley: (Brannon) let me see if there are any questions.

Man: No. Thank you.

Bruce Twomley: (Brannon) thanks very much.

And that brings me to (Ryan Kapp).

(Ryan Kapp): Good afternoon.

Bruce Twomley: Howdy.

(Ryan Kapp): I am (Ryan Kapp). Father and I fished Sitka for 17 years and then we sold the permit. We fished San Francisco roe-on-kelp for a number of years. And my dad actually started that roe-on-kelp fishery.

So the Board of Fish has asked you guys to make the regulatory change, correct and overlap the fishery areas due to a proposal my father (Del) presented and I'm here today to support the change. I've already spoken to the



merits of proposal before the Board. So anyway they were advised by their legal counsel and here we are.

So let's see. I can gloss over a lot of this because you already covered it.

One thing that was kind of intriguing to begin with though was that while the Sitka area is - it's limited to the area of the (ADF&G) regs and it kind of matches the administrative area with those permits. While the Northern spawn-on-kelp fishery is also limited to areas by the (ADF&G) regs but the administrative areas that goes down to (North Deneros) not down to (Baspet Cape). So anyway there's just inconsistency there.

It's unfortunate really that this wasn't brought up years ago - back, you know, and you've heard that we did the experimental fishery in '98 and '99 and I was a part of that. And it's unfortunate that during the Board process that we didn't see this little hurdle before us which led to this hearing today.

So I would hope that the merits of the proposal - we can go ahead and vet that in March up in Anchorage. And then I know there's a - I think a precedent for doing this in the memo that you guys issued. You guys being CFEC - issued I think it was January 12, 2000. It talked about an incidence where this happened in Norton Sound where there was an alternate harvest method attached to the existing permits in that fishery.

((Crosstalk))

(Benjamin Brown): I was just going to say (Ben Brown). What's the - did you have a date for that memo? January, 2000?

(Ryan Kapp): You know, I think we have it.



((Crosstalk))

(Ryan Kapp): Yes it was RC 100...

((Crosstalk))

(Ryan Kapp): So anyway it's looking like something was there. So - well others have kind of touched on it. I'll just - I'll give you my take.

I just see things a little bit differently. And I've been involved in roe-on-kelp for a long time. Not necessarily closed ponding but open ponding and we've done it down in San Francisco and we did the experimental thing in Sitka. Oversupply and controlling supply, you know, years ago when this thing was first brought before the Board it was the same argument as it is now.

I don't know if things are better but I can tell you that they haven't improved from what I see in both markets. Both sac roe and the roe-on-kelp. So you get curious as to why and we've been trying to control supply but it's kind of a moot point. You can't control Canada. If Tenakee happens to open people are going to go there and fish. That's what they do. If they're in a Sound, opens, people are going to go there and fish and that's what they do.

And the thing fluctuates based on volume going into what is, yes, a very limited market. How do you make a market bigger? What is the problem? We've tried messing with supply. The problem is my mind is shrinking demand. You read all sorts of - CFEC had their own marketing report that was based on sac roe but sac roe is kind of concurrent with roe-on-kelp a little bit in that the demand is changing, tastes are changing. Same reason you don't go



to Denny's and see people ordering liver and onions anymore. Because the people that enjoyed liver and onions are dead.

So in order to get a new market for this product its supply. And unfortunately I can't do it with, "Oh just pick up a little bit of this lower grade product from the existing fishery." You need volume, you need numbers that are too big to ignore. We did it in San Francisco where there was a year that the quotas were large and we knew we were going to have a hell of a time moving the product.

And so we went out and we found another buyer separate from the single buyer in Japan. There's actually two. One does about 85%. The other one does about 15%. But still very low volume compared to what that country can consume. We found somebody else and went with them and gave them a whole bunch of product. We had a successful year down there. And he managed to get it into places outside the norm. Because our open pond product is thinner than what they produce in the closed pond just by the nature of how it's produced.

So the following year what happens - we also had a big blow to the following year. Hooray for us. San Juquin Valley floods out we can't keep kelp. It's an estuary fishery. We can't keep the kelp fresh. We got no product. We've got nothing to give to this guy. So in order to get the numbers and have consistent supply the place you do that is Sitka Sound because those fish come in and hose down the same section of beach year after year after year and you'll be able to pull an amount of product out of that with some consistency to entice somebody to take on the challenge of exploring new markets. It's a grand idea, I know, but grand ideas sometimes turn out pretty good.



What the end hope is is by trying to broaden the demand for the product it's also going to cast a light on other existing forms of the product and prop that up as well. I'm not here to decimate a fishery. I'm here to provide opportunity.

And so that's about it. And I mean I've done the fishery as well and yes I'm not a resident and no I don't currently own a permit but this is an idea I had to try and improve things and thanks for your time and we'll see what the Board wants to do.

Bruce Twomley: (Ryan) let me ask you - can you remind me what happened during the '98 and '99 experimentally fishery? Where did that occur?

(Ryan Kapp): In Sitka Sound.

Bruce Twomley: Sitka Sound. And what was that experience?

(Ryan Kapp): It was good. Yes, it was good. Everything - I can't remember anything notable about it. We went and we did it for two years.

Bruce Twomley: How many folks authorized to participate?

(Ryan Kapp): It was a group of - boy I want to say probably 10 permit holders. But everybody contributed and stuff like that. Either time or monetarily to make the thing happen.

Bruce Twomley: Did they commit their whole season?

(Ryan Kapp): No, no, the sac roe - we fished the sac roe fishery concurrently.

Bruce Twomley: Okay.



(Ryan Kapp): We did it at the same time. So in the end - so we showed that it could be done and maybe (F&G) got their conversion numbers off it, you know, so they know that roughly, you know, 100 tons of roe herring can produce 50,000 pounds of roe-on-kelp product. You know, so there's a conversion when the eggs are hatched and there's hydration. And so we've managed to determine some things that way. It was the same study essentially that we did in San Francisco when we started that fishery.

But at the end of the day I think what happened back then was when the actual rules were established that it wasn't set up to where anybody wanted to participate. And that still may happen down the road here. But when the rules were set up we got booted out of the Bay Area where we did the experimental fishery. Because the tribe didn't want us there and, you know, just all these other things. And then we couldn't get anybody, not even us, and we had all the equipment to do it. It just wasn't shaped up regulatory-wise into a shape that we wanted to do. So now some time's passed and we thought we'd take a look at it again.

Bruce Twomley: Let me see if there are any questions from us here.

(Benjamin Brown): (Ben Brown). I would just ask what are your thoughts about the changes in the actual demand side of the market between when this experimental fishery was prosecuted and today.

(Ryan Kapp): Well it's gone down.

(Benjamin Brown): And do you think that's something that needs to be taken into account?

(Ryan Kapp): Well you have to figure out a way to get it back.



(Benjamin Brown): On the demand side as well?

(Ryan Kapp): Yes. Or just keep shrinking into what we have now which is essentially a real, real small market. And it's not forecast to get any bigger. So the people that I talk to - where's the biggest chance for demand? Because their economy's changed over there since the recession hit for them. They've put clamps on corporate gift giving which used to be a huge deal for them. We used to process this stuff in Bellingham.

You do it (it's a pan sac cut) and then you line it up in a little box and we sold it at duty-free shops so we had it in San Francisco, L.A.X., New York, Seattle. And so the foreign travelers would come over and it's a big holiday thing. They used to shut down for three days during the holiday. That was a huge "mine time" because people would stalk pile this stuff. So between that and the corporate gift giving you had this big pile and it was largely coincided with the New Year's holiday. And again still running through essentially this one guy over there.

The problem is it's got a shelf life of two years. So if you do build up any inventory yes you're a little bit hopped because this guy's got absolutely no incentive to move it because it lasts forever, you know. So there's a problem there. But as we were doing it now you have the holiday thing has changed. They got grocery stores opened. So you're looking for something that's a little bit more year-round consumption. The people I talk to that have been marketing this stuff for 30 years - sac roe has a hard time breaking out of that traditional year-end moniker.

Jumbo thick product has a tough time breaking out of that year-end moniker. Thinner product where you can showcase the kelp and get away from the



herring eggs a little bit more. And the freshness and the flavor of the kelp and health aspects of the kelp - that's got the biggest chance to break out into a year-round market that would handle the volume. But you can't do it without consistent clients.

Bruce Twomley: Thanks. (Brannon Finney) has her hand in the air. I'm not going to invite a dialogue between the witnesses but you may put a question to us and - if you care to.

(Brannon Finney): I see the merit in what he's saying about changing the nature of the market to incorporate more low-end product that will suit your more average consumer but I'm wondering if it's - I still don't see why we would remove Sitka from roe-on-kelpers when we're the most experienced and the most - the best people to create that product. Why would you take Sitka from the people who have the permits -- the roe-on-kelp permit -- to create new permit holders that don't know what they're doing for a fishery that's completely different if you're going to open up Sitka and try this new experimental market. Like, to create a more medium grade product then why wouldn't you just leave that up to the established roe-on-kelpers, that people that paid for the opportunity to do that.

Bruce Twomley: Okay (Brannon) I'm going to note your comment for the record and I think we'll move on from there.

((Crosstalk))

Bruce Twomley: And I see another hand. (Larry Demmert). And again you're welcome to pose the question...

((Crosstalk))



(Larry Demmert): I wanted to get on record when the (unintelligible) how many years ago it was.

(Ryan Kapp): It was a long time (Larry). It was '98? '97-'98.

Bruce Twomley: Okay. Are there any questions from us for (Ryan). (Craig) (Pillar).

(Craig) (Pillar): So was it open in the experimental years there in Sitka Sound on - was that open-pounded? And that's why there was a product that was called sort of a medium grade lower grade or...

(Ryan Kapp): Yes. Yes it was all open pound. So no nets, no catching.

Bruce Twomley: Any further questions? If none thank you (Ryan).

And that brings me to (Ryan) (unintelligible). I don't quite have your last name....

((Crosstalk))

(Ryan Blake): Yes I'm a Sitka permit holder. I actually didn't come here to testify but I decided I would.

Man: And where are you a resident of?

(Ryan Blake): I'm a resident of Alaska - (Cordova), Alaska. I bought my permit in 2010 and the guys have paid a ton of money for it. The thing that nobody's brought up - you know, you couldn't hardly give away a pink salmon, right, for ten years. So while I don't know what the market's going to bring -- you know, nobody does -- but what I want to say is if I was these guys right here - if I would have

bought a pound permit I'd be sitting right there where they are. I'd be scared to death about what this proposal could do to them. So anyway that's all I wanted to say.

Bruce Twomley: Okay. Hang on one second. Any questions for (Ryan)?

Man: No. Thank you.

Bruce Twomley: Okay. Thank you (Ryan).

And let me ask do we have anybody in addition signed up.

Man: Yes.

((Crosstalk))

Bruce Twomley: Okay. Well in that event I'm going to call on our operator. Operator?

Operator: Thank you ladies and gentlemen. If you would like to register a question please press the 1 followed by the 4 on your telephone. You will hear a three-toned prompt to acknowledge your request. If your question has been answered and you would like to withdraw your registration please press the 1 followed by a 3. If you are using a speakerphone please lift your handset before entering your question. One moment please...

((Crosstalk))

Bruce Twomley: And operator could I interrupt for a second. We're happy to take more of the questions. We wanted to give the people on the line the same opportunity to



testify as we have the people in the room. So if you could -- in the order you can identify -- invite testimony to us from people online that would be great.

Operator: And our first testimony comes from the line of (Brad) Scudder. That's S-C-U-D-D-E-R from Boise, Idaho. Please proceed.

(Brad) Scudder: Chairman Twomley thank you for the opportunity to testify. This is (Brad) Scudder.

As I understand it what we're discussing today is the area definition between Northern Southeast roe-on-kelp area and Sitka. Is that correct? That's the main topic and not particularly the market conditions and so forth?

Bruce Twomley: Oh that's correct. We're - in the course of working through our proposal we're not going to get to the merits of 126. We're thinking primarily about whether or not we have complied with our own statutes. But there are also - I mean, all of those testimonies informative and so I'm not - I'm certainly not curtailing any testimony. I'd like to hear anything that anybody thinks is relevant.

(Brad) Scudder: Okay. Well very good Mr. Chairman. I will start with some discussion about the area definition. I have been involved in herring in Alaska. I have (seine for herring) in every (seine) district in the state. I'm involved in Northern and Southern and I have been a past permit holder in Sitka sac row.

The area between the Northern Southeast roe-on-kelp in Sitka - that encompasses (Salisbury) Sound. Those stocks are in question. And you earlier stated that why these areas are the way they are is you're not really certain. I've had extensive conversation with (Bill Davidson) about herring and I've seen them change places. For instance (the Kashecks) fishery. Those



fish have migrated to a net island in (Bing) Canal. That doesn't really even happen anymore.

You have significant spawning events going on in (Casbay) and (Lizianski). The (Salisbury) fish we really don't know where they're going. They're included in the Sitka Sound biomass estimates and fishery. A lot of people think they've seen them going north through (Surgus) (Sounds). People think they belong to Hoonah Sound. We've lost a lot of those fish there. We don't know if they've gone over to (Cas) or wherever.

The natives named these fish the ghost fish because they can pull up anchor and move. It's the nature of the fish. That's what they do. So I think a large area to anticipate some of these movements is wise and I think it's a good idea to look at this stuff over a very long period of time because they do move. And it's the history of the fish. It's what they do. And there's no guarantee the fish are going to be in Sitka forever. They could move around and sometimes they're down at (unintelligible).

So that's my opinion on that. I think I have quite a bit at risk here. I'm involved in a seven permit group. We have three limit (unintelligible) involved and seven people. We've got permits in both areas and if we need roe-on-kelp we should ask the roe-on-kelp people that have the permits and have paid for the permits to fish them and not cut them out. That doesn't make any sense to me.

Further, it appears to me Mr. (Kapp) has a market issue and not - I really don't want to entertain let's give my area that I own a permit for to somebody else. I'm not going for that. I really hope you would not entertain that idea. Where does it stop?



Those are my main points. I have written you a letter Mr. Chairman and I think I'll probably just save that for the rest of it if we're just going to be speaking about the area. Those are my main points. Thank you for the opportunity.

Bruce Twomley: Thank you. Let me see if we have any questions from here. Any questions for (Brad)?

Man: No.

Bruce Twomley: Okay. (Unintelligible) (Brad) thanks very much for your testimony.

(Brad) Scudder: Thank you.

Bruce Twomley: So operator we can go to the next person in line.

Operator: Okay ladies and gentlemen as a reminder to give your testimony please press the 1 followed by the 4. And we do have a testimony coming from the line of (James) Barnes B-A-R-N-E-S from Craig, Alaska. Please proceed.

(James) Barnes: Hello?

Bruce Twomley: Hi (James). Welcome.

(James) Barnes: What I'm getting from what this man is saying is he's saying that all he wants is he wants to serve this market by flooding it with a bunch of sub-par product. Right? That's not going to work. How can you keep flooding the market over and over and think it's going to work? There's not really - there's not another market out there so this the one market. (Unintelligible) product you're going to have to (unintelligible). And I think if he wants to be include



in the herring (unintelligible) he needs to either (unintelligible) or (unintelligible) and let everybody take a shot at it like they do everything else.

(Unintelligible) and have the option like they do down here (unintelligible). But I don't see how you can be changing one gear type for another. That doesn't make sense to me. If I've got a (unintelligible). But I don't agree with this at all. I don't agree with the changing of the (unintelligible) then the people that invested in those permits should have the first shot at it and the only shot at it unless these other guys want to buy into it. So that's all I have to say.

Bruce Twomley: (James) you're - hold on. Let me see if there are any questions from my group here. Any questions for (James)?

Man: No. Thanks.

Bruce Twomley: (James) I could just mention - and I guess I feel maybe I should mention - there are in the Commission's history there have been changes of gear types within fisheries and it's just something's that there. I think I should mention it just so you folks have some of the same information I have.

But the first and somewhat striking change was that the Board of Fisheries eliminated Southeast salmon set netters just at the point Limited Entry was being entered into effect. And the Commission allowed, authorized, former set netters who'd been put out of business to apply for gill net within (unintelligible) permits. And some of those people demonstrated an entitlement and one gentleman I recall (unintelligible) real land got a permit in that fashion so they know him. But that's one sort of historic example.



And a more recent one was in the sablefish and this is in Prince William Sound. And this is limited about the same time that we were limiting roe-on-kelp fisheries in Southeast but in the sablefish in Prince William Sound sablefish fishery we limited the fishery for fixed gear and for pot gear and for net gear. And at some point after that the Board of Fisheries authorized both the fixed gear permit holders and the net gear permit holders to fish pot gear provided they submitted to the regulatory (unintelligible).

But I mean I just want to mention that just to, I mean, just so you know that and have that as a background. It's something I have been thinking about.

(Larry Demmert) has his hand raised. Let me acknowledge. (Larry)?

(Larry Demmert): Just upon what you said there. So does that mean that Northern Southeast permit holder I can change my permit to (unintelligible) or is a Sitka Sound permit because if you're changing that gear type and basically eliminating my (unintelligible) can I change it over to Sitka (unintelligible) in that area?

Bruce Twomley: It does not. And I mean - I think - our understanding of the statute today is this kind of thing could only happen if the Commission could find that the change was consistent with the purposes of the Limited Entry Act. And so that's the control on it. We would have to make that affirmative finding or some kind of a proposal like that to go forward. But I did want to mention these two events and there are some similar transactions but just to indicate that this is not - well this is what's gone on in the past. I just wanted to make sure you had the same information I had.

(Brannon)?



(Brannon): The example that (unintelligible) gave were a difference in gear change though and we're talking about difference in areas. You didn't take the Prince William Sound area from one gear and give it to another. And that's what's on the table for us right now.

Bruce Twomley: Yes. And that's important. So (James)...

((Crosstalk))

Bruce Twomley: I suspect that was the case. Yes.

Man: (Unintelligible) and what you mentioned here is well when they did this the losing party of this is (unintelligible) in some way. (Unintelligible) and that's it.

Bruce Twomley: Okay. And (James) for the record I don't believe there was compensation involved in the two transactions that I mentioned. It's just a couple of historic things that happened.

Man: I'm not hearing any compensation on this at all, what's happening here. (Unintelligible) because we've got this other permit.

Bruce Twomley: Okay. And (James) any further comments?

Man: No, that's what's I've got to say.

Bruce Twomley: And any questions for (James)? Okay thank you (James). Thank you for your testimony.

((Crosstalk))



Bruce Twomley: I'm sorry?

Man: I do have one more comment.

Bruce Twomley: Okay. Please.

Man: He was talking earlier about them being in a recession there and I'll tell you how that works. When - like when we're in a recession here in this country all our luxury items go. It's the first thing that people do. The luxury items go such as Starbucks, eating out, stuff like that. If they're in a recession over there (unintelligible) stuff like that.

You know the (unintelligible) all this stuff is what's going to go first and that's what they'll stop buying first when they're in a recession. It's no different than here. So to put another fishery on that that fishery's going to produce a lot more product that they're already not buying and it's not going to work. It sounds like nonsense to me to flood an already saturated market. And that's all I've got to say.

Bruce Twomley: Well thank you (James). Thank you for your testimony.

And operator I think we can go to the next person in line.

Operator: Mr. Twomley there are no further testimonies at this time.

Bruce Twomley: Okay.

Operator: One moment I do have one. So we have a testimony from the line of (Jeff) F-E-L-D-P-A-U-S-C-H from Sitka, Alaska. Please proceed.



(Jeff) Feldpausch: Mr. Chairman my name is (Jeff) Feldpausch. I'm a resource protection direction for the Sitka tribe in Alaska. Just for the record the Sitka tribe won't be providing official comment today but I am sitting in a room here with a few tribal citizens, one of which would like to provide comment today if that is all right with you.

Bruce Twomley: That would be fine. Could your witness please identify himself and maybe spell his name for our benefit.

(John Duncan): Yes hello my name is (John Duncan). I'm a long member here in Sitka, Alaska. I've been a life-long subsistent user with herring. Herring roe on the (unintelligible). And the question I have and the problem I have with this whole situation is that this is not a new fishery you're talking about.

This is a fishery that was done years ago with not only the native people in Southeast Alaska but all people in Sitka area and the villages and Hoonah and (Cake) that would come over here and make (unintelligible) and that was taken away from them from the Department of Fish and Game stating that we were ruining the kelp.

And I think in all that it's really discriminating against our people that did that by taking that away and now putting it up for commercial people that have permits already. I think that all the people that were entitled to that should be entitled to it with permits that did that here.

Okay. Number two. Actually should be number one. We already have a problem with the fishery here - trying to control that and not knowing what's happening to the herring here. Now we want to start another fishery that could



do more damage to the herring around in this area. And we're still going into more problems.

Some of these areas that are used for subsistent use are down to maybe 25% of the areas that we used to get it. And putting more fisheries in these areas would cut our chances of getting our herring eggs even more. The other places that people are talking about - the miles and miles and spawn means a lot of milk, no eggs.

But our people are really entitled to have a say so on this. I mentioned it before that we are being discriminated against and I'm sure that there's going to be a lot of lawsuits before that can even be passed or if you pass it there will be. That's what I have to say. I'm 100% against opening this herring sac roe fishery in Sitka Sound. Thank you.

Bruce Twomley: (John) thank you. Let me see if there are any questions for you. Questions for (John)?

Man: No, thank you.

Bruce Twomley: Okay. No questions so (John) thanks very much for your testimony.

Operator: Ladies and gentlemen as a reminder to give your testimony please press the 1 followed by the 4 on your telephone.

We have a testimony from the line of (John) Carle, C-A-R-L-E from (Hydaberg), Alaska. Please proceed.

(John) Carle: Hello Mr. Chairman. My name is (John) Carle, resident of (Hydaberg), Alaska. And I've been kind of listening to the testimony and you know I'm a



permit holder in both Northern and Southern Southeast areas. I'm also a Sitka Sound sac roe permit holder at the time. I've been involved in the roe-on-kelp fishery since I believe '92 if I'm not mistaken. And, you know, I've seen a lot of changes in the way we conduct our business as roe-on-kelpers. We've tried to get better product forms, how we've tried to develop different markets. I've spoken directly with our largest buyer in Japan, (Kinea), and from his standpoint that it is a very limited and shrinking market. And I don't see how putting more product on the market is going to help that.

I believe that if we have just the potential of a roe fishery at Sitka Sound, roe-on-kelp fishery, it will destroy the market. If we have two or three areas open the buyers go into that season and set the prices lower based on that before we even produce anything. And if you had the potential of another fishery on top of it they're going to drive the price down before we even see how much volume's out and once that's driven down we don't get a kickback at the end. We don't get to handle the product. The product gets delivered and it gets shipped off and we get what's left over after they sell it.

I believe this will destroy two existing fisheries right now. You know, the thing is we went to the Board of Fish just this last year and put in a proposal for conservative reasons and for market reasons to lower our blade count to try to and produce less product, to try and use less fish. And now we're going to have a fishery that comes in behind us that wants to try to make up for anything that we're trying to get off to market on our own to try to help ourselves out.

It just seems counterproductive at this point. And you know I don't know - you might make - I just don't know how you could make more money on this product because we produce plenty of number twos and threes as it is. I mean some years that's all we produce. And it just depends on the fish and the blade



count and you know right now this market is hurting and the only thing going for it right now is that we actually have a couple less fisheries and maybe it will turn around for us. But that's about all I have so thank you.

Bruce Twomley: (John) thank you. Let me see if there are any questions for you.

Man: No, thank you.

Bruce Twomley: Okay. (John) thank you for your testimony.

Operator: Our next testimony comes from the line of (Ron) Porter. P-O-R-T-E-R from (Ketchkin), Alaska. Please proceed.

(Ron) Porter): Yes Chairman Twomley thank you very much for giving me the time to speak. My name is (Ron) Porter. I'm a resident of (Ketchkin), Alaska. Alaska born, lived here my whole life. I've been involved in the roe-on-kelp fishery in (Pluma) Sound and the sac roe fishery in Sitka since both of their inception and I think you guys have probably heard the best of the testimony from the different individuals that have - are working this thing on a daily basis. It's my opinion that this situation is not broke in any way shape or form and doesn't need to be fixed.

I think it needs to be just left status quo. I make my assumption on that I have family members that are involved in both fisheries and I hear all the talk about the markets and trying to find more markets. This new market that we're talking about at the present time does not exist and so we're going to go try to find it and have to put some product in front of it before we can go find it. That doesn't make much sense to me.



I'm curious what happened to the roe-on-kelp fisheries in California and down the coast. Are they still viable or are they closed?

Bruce Twomley: I can't tell you. Is there anyone - (Larry Demmert) has his hand...

(Larry Demmert): I believe California is still operable.

Bruce Twomley: (Larry Demmert) says he believes California is still operative but with smaller quotas.

(Ron) Porter: Well thank you much for your time and like I say I think everything is doing as well as it could possibly do and it's not broken anywhere that I can see so let's leave it like it is and I'm opposed to any changes.

Bruce Twomley: Okay (Ron) let me see if there are any questions for you. No. Okay seeing none thank you (Ron) for your testimony.

(Ron) Porter: Thank you.

Operator: And our last testimony comes from the line of (Michael) Svenson S-V-E-N-S-O-N from Sitka, Alaska. Please proceed.

(Michael) Svenson: Yes hi. My name's (Michael) Svenson and I'm from Sitka. Anyway I just wanted to call on behalf of the Sitka sac roe and northern roe-on-kelp and on your statement of whether of course we will have the right to reserve judgment until we have heard all the public testimony as to whether or not it is consistent with the purpose of the limited entry act. Anyway I sent a letter back a few weeks ago on this and I wanted to add on top of it that by you guys adding more permits - because when I was 12-years-old I first bought a Southern sac roe permit - a Southern roe-on-kelp permit.



And that was my first investment and since then it's done well for me. But by adding more permits and giving them out basically for free that would diminish the value of my investment and others and I just feel like where would it stop? I mean would this add more permits to other fisheries and I don't know. I just feel like this could be total chaos and I feel like it should stay the course of what it is right now.

Bruce Twomley: And I'm a latecomer to Limited Entry. I wasn't here at the inception and so that stuff is sort of history to me and I can't really comment on that. I don't know what led to those decisions.

(Michael) Svenson: Well just the legal aspect - what's the priority (unintelligible) disbursed it has a priority over anything that follows it in history.

Bruce Twomley: And that's an argument.

(Michael) Svenson: I just wanted to get that out there.

Bruce Twomley: (Michael)...

Man: And just to clarify what you just said historically those fisheries were shut down because the kelp forest would be destroyed so much and they were really nervous about kelp back then so they stopped those fisheries (unintelligible).

And also wanted to comment on all of us have talked about we worry about the (unintelligible) value of our investment that should be noted and you guys should know we have a lot more invested than just our permits. The gear that we've invested in over the years is pretty substantial and it's a mountain of



gear for this fishery (unintelligible) and our nets that are built exclusivity for these fisheries. It's pretty substantial and I'm not sure you guys are aware that all of these - all roe-on-kelp fisheries in both districts you can't do it alone. It's - they're all combines. Every single fisherman that's in these two fisheries -- and most of us are in (unintelligible) fisheries -- we're in these groups, it's a collective group and basically the only way it could work is one of these fisheries in Alaska that I know if is unique in that regard.

Bruce Twomley: Thank you. Yes.

(Mike Bangs): Just to reflect on what Mr. (Demmert) said about the earlier fishery. And one of the reasons that they closed it is because of the method of harvest in - they were ripping the kelp off the bottom and that is a totally different way from the way it's conducted now of harvesting kelp. We harvest the raw kelp by the leaves and back in those days when they were doing the roe-on-kelp fishery they would wrap around big wads of kelp and just rip them off the vine and destroy the kelp beds. That was the main reason why they closed those two fisheries. The kelp in the southern end around Craig and then the one around Sitka Sound. Because of the method of harvest.

Bruce Twomley: Thank you. That was (Mike Bangs) for the record. Thank you.

Man: Oh one other question. I serve on a Southeast Regional Subsistence Advisory Counsel and there was some testimony at several of the meetings in the past of concern about what interactions were going to take place between the subsistence branch fisherman that their branches into the thick kelp or the thick areas of spawn, the interaction between these open pounding wanting to go into the same areas. I just wanted to make sure that you guys listen to and take head to the comments from the Sitka tribe because I think it's very



important that we consider the subsistence take and how the open pounding is going to impact their methods of harvesting.

((Crosstalk))

Man: ...experimental fishery and we have a report that I failed to bring up but anyway there was an interaction between the subsistence users and our group but the interactions were all positive. (Unintelligible) and they got good coverage and there was no conflicts.

Bruce Twomley: Thank you. And (Brannon)?

(Brannon): Touching on what (Mike) said we, you know, it wasn't sustainable how they were harvesting the kelp before but we have since then we've found better ways of harvesting kelp. We've found what works about how many fish we should put in a pound. We found what the best dimensions are, when you should add the fish, et cetera. We're really experienced at what we do. So I feel like since we're the most experienced in harvesting this product to make it sustainable and economical because we have the most invested in the success of the future of the fishery then if there's going to be anything done in Sitka it should be left up to us.

(Larry Demmert): (Unintelligible) add this to (unintelligible). Since that experimental fishery was done in '98 the tribe has demanded the core area be excluded from commercial harvest of sac roe. And this was where the pond fishery took place back in '97 or '98 - was in that core area. And the ponds in that area were not successful. I don't know if they had it in any other place that were not as successful as they were in the core area - the subsistence area.

Bruce Twomley: Thank you (Larry). (Ryan Kapp).



(Ryan Kapp): (Unintelligible) in a couple other spots other than the core area (unintelligible). Depending on what the Board does they're willing to look at it (unintelligible) into their spot or not or whatever. And kind of let that (unintelligible) for discussion. But we have (unintelligible) outside the area. There's other spots where they spawn (unintelligible).

Bruce Twomley: Okay. Thank you (Ryan).

Man: And I think just to sum it up I don't think anybody here is opposed to how much - I don't think anyone's opposed to like a new market. We certainly are given a market that, you know, we can sell a lesser grade product at a higher price and there's a huge demand for it, I mean, we're taking care of two birds with one stone. At the same time I think that when we talk about it's not already an established market and I mean and presented with research then maybe I could consider it.

But just taking it on the word of well this sounds like this is the way to go. Well when you're talking about a substantial part of my income based on this is how you feel that this should go. And we're also talking about changing gear type and statistical area. And then overall the end product which is really, I mean, a potentially new market, you know.

I mean, that's a lot to change especially if - I guess especially if the people trying to change it aren't assuming that risk. That just seems - it seems like we're trying to do a lot here. And I really don't think anybody, like I said, is opposed to a new market with it. It seems like we're going about it wrong.

Bruce Twomley: Thank you (Nick). I think I'm prepared to call it in to the hearing. I want to remind everybody that you've got a whole other week to comment. You can



do it in writing and those comments will be part of the record if we get them by 3:00 a week from now, Friday November 13. So if this prompts any further thoughts, any further information you want to convey to us we'd sure welcome it. Just remember the deadline 3:00 next Friday the 13th.

And with that I want to thank everybody for your participation and I appreciate your testimony and I just want to thank you. So with that I think I'll conclude our hearing and we will go off the record. Thank you.

Operator: Ladies and gentlemen that does conclude the conference call for today. We thank you for your participation and ask that you please disconnect your line.

END



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: ROK fishery
Date: Friday, October 30, 2015 1:08:03 PM
Attachments: [image001.png](#)

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: Anthony Thomas [mailto:anthonytaiber73@gmail.com]
Sent: Friday, October 30, 2015 12:13 PM
To: Lippert, Randy J (CFEC)
Cc: Anthony Thomas
Subject: ROK fishery

Randy-

I have a southern southeast rok permit. I am very much opposed to any change in regulations regarding the existing Northern Southeast ROK or the Southeast roe fishery. Putting more roe on kelp product in the market will devalue the product and fishery permit value. I believe the demand for roe on kelp has diminished over the last few years. This is reflected by the low price to fishermen even while supply is down. I am fearful that open pounding in Sitka Sound will only be a segue to closed pounding in the future leading to direct competition to the existing fishery.

Please do not create another roe on kelp fishery in southeast.

Thank you
Anthony Taiber
pob 1861
Petersburg AK 99833



Register _____, _____ 2016 MISCELLANEOUS BOARDS

20 AAC 05.230(a)(9) is amended to read:

(9) **Herring spawn-on-kelp pound administrative areas.**

Code Letter	Name and Description
A	Northern Southeast Area – Districts 9 – 16, <u>except for the waters of Section 13-B north of the latitude of Aspid Cape and Section 13-A south of the latitude of Point Kakul (Salisbury Sound)</u> , as described in 5 AAC 33.200.
C	Southern Southeast Area – Districts 1 – 8 and the Dixon Entrance District as described in 5 AAC 33.200.
E	Prince William Sound Area – the statistical area described in 5 AAC 27.300.

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I don't think Sitka Sound should be able to do Spawn on Kelp!


I know their market has fallen off but so has ours.

1. Putting more spawn on Kelp on the market will only ~~sub~~ saturate an already saturated market.

2. The market is low partly due to low grade product and too much product. So by putting more product with will produce a percent of low product does ~~nothing~~ one any good. It just brings another fishery down.

3. Spawn on Kelp will not save Sitka Sound Sockeye fishery.

4. If they want a Spawn on Kelp permit they should have to buy one like everyone else.
over 2

5. This was tried with five fisheries, say  PC 16
52 of 79
they did one dive they deserve the other fisheries. It was
found unlawful. This one should also be found unlawful.

James F Barnes Jr.

L21C 67623X

James F Barnes Jr.



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: B of F Meeting Proposal 126
Date: Thursday, November 05, 2015 10:22:34 AM

Randy Lippert
Scanning Clerk
Commercial Fisheries Entry Commission
Phone: (907) 790-6945 Fax: (907) 790-7045
Email: randy.lippert@alaska.gov

-----Original Message-----

From: Brian & Carol Kandoll [<mailto:kandolls@gci.net>]
Sent: Thursday, November 05, 2015 9:29 AM
To: Lippert, Randy J (CFEC)
Subject: B of F Meeting Proposal 126

To: Benjamin Brown, Commissioner
November 5, 2015
Bruce Twomley, Chairman

Dear Sirs,

Thank you for your letter of October 6, 2015 in regard to this meeting to consider changes to the Northern Southeast Roe On Kelp fishery. I hold an NSROK permit, which I purchased and fish when it is open, so I am one of the 111 (91 resident, 20 non-resident) permit holders in that fishery. I was also issued a permit and participate in the Southern Southeast fishery, one of the 167 (143 active resident and 24 active non-resident) who have a permit for that one.

This is a fishery that is sensitive price-wise to the volume of product that is produced every year. When we have higher production years, those times when Craig, Ernest Sound, Hoonah Sound, and Tenakee are all open, we feel the price effect the next year and beyond.

I see in Mr. Kluberton's March 3, 2015 letter to you that he states a couple of the reasons for the proposed changes. These are, a lower price per ton for the Sitka seiners and the desire of the Sitka Tribe to reduce harvest levels. In these two points, putting more ROK in the same market would drop the price for everyone, since whether it comes from an open pound or closed pound, it goes on the same market. It is true that the herring swim away from an open pound, but the eggs are harvested.

The people who would gain are probably the Sitka seiners. Even though the price per pound would be lower than it is now due to sheer volume that would be produced, they could make it work, while those of us in the existing ROK fisheries would probably be forced out of business at lower price levels.

I don't feel that this proposal is consistent with the purposes of limited entry, and am opposed to the restructuring of the areas.

Thank you,

Brian W Kandoll
PO Box 1363
Petersburg, AK 99833

kandolls@gci.net
907 518 1376





From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maahe, Mele \(CFEC\)](#)
Subject: FW: Alaska commercial fisheries commission and
Date: Thursday, November 05, 2015 7:31:03 AM

Randy Lippert
Scanning Clerk
Commercial Fisheries Entry Commission
Phone: (907) 790-6945 Fax: (907) 790-7045
Email: randy.lippert@alaska.gov

-----Original Message-----

From: Phil and Amy Fogle [<mailto:philfogle@hotmail.com>]
Sent: Wednesday, November 04, 2015 4:48 PM
To: Lippert, Randy J (CFEC)
Subject: To: Alaska commercial fisheries commission and

To: Alaska commercial fisheries commission and Alaska board of fisheries

From: Charles Fogle F/V Invincible

To commissioner Benjamin Brown and chairman Bruce Twomley, I have participated in the Sitka sac roe fishery for 17 years and have seen the market and the price go up and down many times. I believe our herring prices are in the slow upward trend right now as we speak. There is no need to consider proposal 126. All the fisheries that have done pounding fisheries are none existent or are barely above minimum threshold. Pounding is hard on the resource and just as volatile in the market place as other herring fisheries. I strongly oppose proposal 126, and encourage you to reject any consideration for it as well. The Sitka sac roe fishery is one of the most stable and sustainable fisheries in the state. Our stocks and quotas have been some of the highest the fishery has ever seen the last 6-7 years. Why would you consider messing with success.

Daryl Kapp who put the proposal in doesn't even participate or own a permit in the Sitka fishery. Why entertain a proposal from a individual who doesn't have current knowledge of what the Sitka sac roe fishery is doing.

In closing I hope you reject this proposal and continue with the Sitka sac roe fishery as it is. Thank you for your time on this matter.

Charles P Fogle

907-230-7977

Sent from my iPad



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: Regulation change proposal, Sitka Sound.
Date: Monday, November 09, 2015 9:52:32 AM

Randy Lippert
Scanning Clerk
Commercial Fisheries Entry Commission
Phone: (907) 790-6945 Fax: (907) 790-7045
Email: randy.lippert@alaska.gov

-----Original Message-----

From: cholm@wwest.net [<mailto:cholm@wwest.net>]
Sent: Monday, November 09, 2015 9:51 AM
To: Lippert, Randy J (CFEC)
Subject: Regulation change proposal, Sitka Sound.

Bruce Twomley, Chairman
P.O. Box 110302
Juneau, AK 99811-0302

Chairman Twomley:

I am strongly opposed to the possibility of the CFEC making any changes to amend the current area for Northern Southeast Herring Roe on Kelp fishery.

This looks to be a backdoor tactic to appease a group of fisherman who would like to change the gear type of a Southeast Alaska Herring Purse Seine Roe Permit.

History tells us that any time you add more product to a limited market, the price of that product will go down. This is exactly what will happen if this proposal goes forth.

Those of us with Southeast Herring Roe on Kelp Permits will be out of business in short order.

Competition from other fisherman in the Roe on Kelp fisheries was expected, but never did I think the State of Alaska would increase competition by changing a regulation to add more product to a small fragile market.

I expect the commission to use some logic and see early on that proposal is not above board, and reject any outside influence.

Thank you,

Chris Holm SSE + NSE ROK Permit - PH#(360) 431-3801



Clyde Curry
F/V Jean C
PO Box 572
Petersburg, AK 99833

ccurry@gci.net
907 518 0380

October 23, 2015

Commercial Fisheries Entry Commission
8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302

Ref: Proposal 126

Dear Board of Fisheries members,

I am an original issue permit holder in the Southeast Alaska herring roe purse seine fishery.


I am a forty five year resident of Petersburg.

The Southeast sac roe fishery has seen ups and downs as have all fisheries and is currently in a down cycle. I do not believe the Board should make radical changes to a down fishery at the behest of a non-resident whom, to the best of my knowledge, holds neither a seine roe permit nor any other Alaska herring permit.

The closed pound fisheries, which produce the same product as open pound, also have up and down cycles and would not be helped by more product on the market. Many of those permit holders are Alaska residents.

I urge the Board to not take unprecedented action on this matter.

Sincerely,


Clyde Curry

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OCT 28 2015
CFEC



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maahe, Mele \(CFEC\)](#)
Subject: FW: not amending the regulation that defines the Northern Southeast herring roe-on-kelp pound fishery
Date: Monday, October 26, 2015 10:18:34 AM
Attachments: [image001.png](#)

Good morning!

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: Dennis O'neil [mailto:banterbay@yahoo.com]
Sent: Monday, October 26, 2015 6:47 AM
To: Lippert, Randy J (CFEC)
Subject: not amending the regulation that defines the Northern Southeast herring roe-on-kelp pound fishery

Dear Mr. Lippert and CFEC:

I am opposed to redefining the Northern Southeast herring roe-on-kelp fishery to exclude the Sitka Sound area.

If there is to be a pound fishery in the Sitka Sound area I have a permit to do so. If someone from another gear group would like to participate they should buy a Northern Southeast herring pound permit.

If at some future date the Sitka Seine gear group is allowed with that permit to participate in a Herring Pound Fishery will my Pound Fishery Permit allow me to participate in the Sitka Sound Seine Fishery?

Sincerely,

Dennis O'Neil



Nov 2, 2016
Forrest Dodson
Po Box 6575
Sitka, Ak, 99835

Commercial Fisheries Entry Commission
attn: Randy Lippert
Box 110302
Juneau, Ak, 99801-8079

Dear Mr. Lippert

As a participant in the Hoonah Sound roe on kelp fishery since 1991 I am opposed to the proposal to have Sitka Sound opened to roe on kelp for only the current holders of sac roe herring purse seine permits.

The roe on kelp fishery was started in Hoonah Sound as an experimental fishery in 1990. Sitka Sound was eliminated as a location because it would conflict with the sac roe fishery already established. A gill net fishery had been allowed in Hoonah Sound but was not being used so this was the location limited entry designated.

After a certain number of years it appeared to be a viable fishery. Limited entry was petitioned to make it a permitted fishery. I was one of the established fishermen and was awarded a permit.

My permit card says Northern Southeast roe on kelp fishery. My card does not say Hoonah Sound roe on kelp. If Sitka Sound is opened to roe on kelp fishing that should include all the Northern Southeast roe on kelp permit holders. If we cannot fish in Sitka Sound then the current sac roe permit holders should not be allowed.

Sincerely,

A handwritten signature in cursive script that reads "Forrest Dodson".

Forrest Dodson

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NOV 04 2015

CFEC



October 23, 2015

Richard Eliason
709 Sirstad Street
Sitka, Alaska 99835

Bruce Twomley Commissioner
P.O. Box 110302
Juneau, Alaska 99811-0302

Re; proposal 126

Dear Commissioner Twomley,

I am a SE resident and a fourth generation fisherman from Sitka, Alaska. I currently owe a SE Salmon Gillnet, SE Herring Gillnet, Northern SE Roe on Kelp as well as a State wide Power troll permits. I derive 90 plus percent of my family income from commercial fishing, and I oppose any action by the State of Alaska to make any changes to accommodate BOF proposal 126.

My objections to proposal 126 are as follows:

- Our current market for Roe on Kelp is 480 tons, in which includes Canadian production. Proposal 126 can easily produce 10% of that production with just one permit. There is close to 49 Sitka Sound Sac Roe permits. When proposal 126 ruins our ROK markets the owners of the Sitka Sac Roe permit can just go back to seining while the current SE ROK guys have to rebuild their markets. Make no mistake there is only one ROK market, that's japan.
- ADF&G would have to allocate Sitka Sac Roe quota to the recipients of proposal 126. Since the Sitka Sac Roe fishery has started in the early 70's there has only been one time that there has been quota share fishery, that in 2015. The Board of Fish has always rejected equal share quotas. This is just an end run to create that fishery.
- My L21A Northern SE Rok on Kelp permit should allow me to fish in Sitka Sound provided the BOF allows it. Any changes to the Sitka Sound Sac Roe fishery that includes a Roe on Kelp fishery should be done by the guys who pioneered the Northern SE ROK fishery back in 1991. We already have the CFEC permit..
- CFEC should create a new Sitka Sound Roe on Kelp fishery that is open access.
- Precedent this action will set. I would love to carve out an area in 15c(SE Salmon Gillnet area) to allow me to exchange my SE Salmon Gillnet permit into a Salmon Seine permit to seine for salmon. Seining is such a more efficient gear. Also this makes more sense than prop 126 since there would be no need for quota shares since the fishery is run on the basis of escapement. A much better way to regulate a fishery opposed to herring.
- And finally I'm not sure that CFEC has the authority to allow such a change in our CFEC system? I have not seen any communications with the attorney general's office speaking to proposal 126? I hardly believe what you are doing is even legal.

In reading the letters from Commissioner Twomley of CFEC and Chairman Kluberton of the Board of Fish it's obvious that we are in uncharted waters with this proposal 126. It appears that

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OCT 26 2015

CFEC



Chair Kluberton is more than anxious to punt the ball to CFEC as to wash his hands of the never ending issues of proposal 126. I hope the CFEC makes the right decision and files this proposal overboard.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Richard Eliason".

Richard Eliason
Sitka

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OCT 26 2015
CFEC



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: public testimony
Date: Thursday, November 05, 2015 8:51:15 AM
Attachments: [image001.png](#)

One caller may not have time so he sent us this written statement.

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: Eric Grundberg [mailto:eric_grundberg@hotmail.com]
Sent: Thursday, November 05, 2015 8:33 AM
To: Lippert, Randy J (CFEC)
Subject: RE: public testimony

Randy,

Tomorrow is a tough day for me to call in. Will be traveling from Petersburg to Craig for a commercial sea cucumber dive opening. Will try to call in, but don't think I will have cell service.

You ask for written comments a few weeks back. This is what I was going to say tomorrow. Been meaning to type this out.

Can you show this to the commissioners?

I have a few problems with the proposed changes.

1. The number of Limited entry permits for any given fishery is calculated on the optimum number for the fishery to be financially viable. The Sitka sac-roe fishery is 50 permits roughly, Northern ROK near a 100 I believe and Southern ROK have about 150 permits fishing each year with a couple hundred more non-transferable not fished. If we are going to start a new ROK fishery in Sitka and the SE region. Doesn't the number of those permits need to somehow reflect the economics of the region wide fishery? Flooding the market with more ROK is only going to split the pie smaller for permit holders already involved. If this change is going to happen, an economic study needs to be presented along side redistricting/allocation changes.



2. We already have two separate commercial roe on kelp fisheries in Southeast Alaska. This proposed redrawing/changing of district lines is already inside of the northern fishery. Why would CFEC and board of fish commissioners we want to take a resource from one group and give it to another?

3. I have a northern and southern ROK SE permit card. I have a fifteen year state loan for each permit. I purchased these permits with the understanding that I would have fishing rights to those resources in Southeast Alaska as long the state of alaska deemed them sustainable and an active fishery. What this change is talking about is granting the permit cards I purchased to another user group. Who hold sac-roe permit card?

Thank you for your time,

Eric Grundberg
PO box 2193
Petersburg, AK 99833
907518 4158

From: randy.lippert@alaska.gov
To: eric_grundberg@hotmail.com
Subject: RE: public testimony
Date: Thu, 5 Nov 2015 16:45:50 +0000

Mr. Grundberg:

Tomorrow's ROK public hearing teleconference number is #1-800-659-1839. The teleconference begins at 3:00 PM and we ask that you call in 10-15 minutes early so the operator can get some information.

We look forward to hearing from you.

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov





From: Eric Grundberg [mailto:eric_grundberg@hotmail.com]

Sent: Friday, October 16, 2015 8:11 PM

To: Lippert, Randy J (CFEC)

Subject: public testimony

Randy,

I would like to give public testimony on friday November 6th for the purpose changes of sitka sac roe fishery. Please email back or call
907 518 4158

Eric Grundberg

PO box 2193

Petersburg, AK 99833



Nov 2, 2016
Mary J. Holzman
140 w. Kennedy st.
Tucson, Az, 85701

Commercial Fisheries Entry Commission
attn: Randy Lippert
Box 110302
Juneau, Ak, 99801-8079

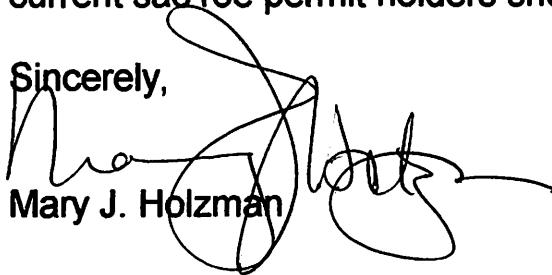
Dear Mr. Lippert

As a participant in the Hoonah Sound roe on kelp fishery I am opposed to the proposal to have Sitka Sound opened to roe on kelp for only the current holders of sac roe herring purse seine permits.

The roe on kelp fishery was started in Hoonah Sound as an experimental fishery in 1990. Sitka Sound was eliminated as a location because it would conflict with the sac roe fishery already established. A gill net fishery had been allowed in Hoonah Sound but was not being used so this was the location limited entry designated.

After a certain number of years it appeared to be a viable fishery. Limited entry was petitioned to make it a permitted fishery. My husband had been fishing there and was awarded a permit. When one came for sale I bought into the fishery so we could fish together.

My permit card says Northern Southeast roe on kelp fishery. My card does not say Hoonah Sound roe on kelp. If Sitka Sound is opened to roe on kelp fishing that should include all the Northern Southeast roe on kelp permit holders. If we cannot fish in Sitka Sound then the current sac roe permit holders should not be allowed.

Sincerely,

Mary J. Holzman

RECEIVED
NOV 04 2015
CFEC



Jasper Allbrett
PO BOX 2223
Sitka, AK 99835
November 6, 2015

Randy Lippert
Commercial Fisheries Entry Commission
PO BOX 110302
Juneau, AK 99801-8079

Dear Randy Lippert:

This letter is to oppose Proposal 126, due to the unjustness of it. For Proposal 126 to have gotten this far and to even be considered, I find it absurd.

I completely understand the concern that the sac roe permit holders have with regards to the decline in the value of the fishery and wanting to find a solution that would be more profitable. The spawn on kelp permit holders are in the same boat, so to speak. I recently received an email from ADF&G announcing there will be no spawn on kelp fishery for 2016 because the forecasted biomass in Hoonah Sound and Tenakee is not enough to conduct the fishery. Those were the areas they found to be viable in the past without interfering with any other fishery simply because there was no need to; so why do it.

For me it's been 5 very long, very difficult, and very trying years since I bought my own boat (and when I say bought I mean took a huge loan out). And I only invested into the spawn on kelp fishery in 2011. Financially, I have been lucky enough to get by every year, on my own, even without making any profit from the spawn on kelp fishery for the past few years. And now more than ever before in my life, every little will most certainly count, because come this December I will have a family of my own to think about. While I am excited to have a baby on the way, I know my life and financial situation will change dramatically.

Like I said before, I understand where the sac roe permit holders are coming from, but I have to ask myself if Proposal 126 gets approved, what will that do to the spawn on kelp fishery? Historically, there always has been more herring in Sitka Sound, than both Hoonah Sound and Tenakee put together. If the sac roe permit holders are allowed to operate out-of-bounds to which their permit entitles them to, the spawn on kelp permit

Randy Lippert
November 6, 2015
Page 2



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holders will suffer an even greater loss than we already are; therefore, rendering my permit pretty useless and I'll be stuck with the debt of it.

Would CFEC and the Board of Fisheries allow spawn on kelp permit holders to participate in the sac roe fishery? Is that not what the sac roe permit holders are asking of you? Surely, I would never propose something like that because it doesn't make sense. However, since Proposal 126 is being considered, it does open the door to other proposals, right. I for one propose that the CFEC, Board of Fisheries, and ADF&G open a spawn on kelp fishery in Sitka Sound for spawn on kelp permit holders, seeing that there's more than enough herring to go around in Sitka Sound and the fishery is not a terminal fishery. Sounds like a win-win situation to me and who doesn't like a win-win situation.

Furthermore, shouldn't everyone know when investing in something there are always risks; one has to weigh those risks and decide to take a chance, if it's worth it to them personally or even feasible and deal with whatever becomes of it. Sometimes the going gets tough, that's life. Fishing has always been and will always be a risky business and investment. Markets fluctuate; to expect it to always be profitable or good is preposterous and of poor judgment. Certainty in life is very rare, if not impossible. Everyone should try to plan accordingly, which I personally always try to do. And yes, if you can find a way to turn bad into good, then great, but it should not come at a cost to others.

To put it briefly, if Sitka Sound is opened to a spawn on kelp fishery, then it's only logical and fair that the people holding the limited entry permits for spawn on kelp be the ones to participate. Especially, since the permit does say "Northern Southeast" herring spawn on kelp and Sitka is part of Northern Southeast Alaska. And by all means, if the sac roe permit holders would like to participate, then they can by purchasing a spawn on kelp permit. I can't see it justly done any other way.

Sincerely,

Jasper Allbrett



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: Sitka Herring Pound Proposal
Date: Monday, November 09, 2015 7:53:53 AM
Attachments: [image001.png](#)

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: Kelvin Vaughan [mailto:vaughan907@gmail.com]

Sent: Saturday, November 07, 2015 2:37 PM

To: Lippert, Randy J (CFEC)

Subject: Sitka Herring Pound Proposal

Hello Randy, my name is Kelvin Vaughan. The reason for this letter is to express my concern for the proposal for the Sitka roe on kelp fishery.

I am 28 years old and have lived in Craig, AK basically my entire life. I grew up herring pounding in both the Southern and Northern districts with my family, as well as salmon seining, shrimping and dive fisheries. I purchased a seiner and a southeast seine permit this past spring and just finished my first salmon season as a captain. Needless to say my family and I fish year round.

I purchased my Northern herring pound permit about 5 years ago and was only able to fish it for two years before being shut down. I understand the situation and hopefully the return will strengthen. The claim that because sac roe is down to \$200/ton and they need to move to a roe on kelp fishery does not make a whole lot of sense to me. I am not extremely savvy about market trends and what exactly causes price to fluctuate, but I do know the trend of the herring roe on kelp market and in one word it is FRAGILE. Too much supply is going to crash the market in a hurry. With the size of the Sitka herring run and the amount of product they could potentially harvest, the market would dive the first year. We notice the price dive when we get three fisheries or more (Hoonah Sound, Tenakee, Ernest Sound, Craig). In one year, if my thinking is right, the "new" Sitka harvest could potentially be more than all of the traditional harvests combined. This leads me to the next fact that the harvest out of Sitka with open pounds is going to flood the market with a bunch of mid to low grades. In short, the market will not be able to handle the amount of product coming out of Sitka and the traditional areas combined. Having Craig as our only fishery for who knows how long in to the future, we need a decent price to make it worth it and to survive. I understand that is what the sac roe fisherman want as well, but as of right now the fisheries and markets are



separate, lets keep it that way. They can ride out their low market and deal with it just like we have done time and time again with low prices. The Sitka sac roe fishery has a lot of big players involved and I understand they have a lot of political pull in order to push a proposal like this along. I want my voice to be heard as young boat owner and someone who would like to see herring pounding survive for years into the future. A pound fishery in Sitka could push the fisheries with smaller herring runs right out of the picture. If Sitka wants change for their sac roe fishery, they should focus energy on marketing and the changes necessary to increase their price. I hope that you can see I am coming from on this. I am not super knowledgeable on this issue, but I understand the main idea at this point and simply wanted to express how I felt this proposal would effect us. I appreciate the opportunity to write you.

Kelvin Vaughan



ATTN Randy Lippert

From Kurt Kvernvik
concerning proposal ~~126~~ 126

will be travelling on the 6th
and can not attend



November 2nd, 2015

Commercial Fishery Entry Commission,

My name is Kurt Kvernvik and I hold a Northern SE & Southern SE roe on kelp permit. I am very concerned that proposal **126** will have a profoundly negative impact on the roe on kelp fishery and its stake holders.

My first concern is that more supply of roe on kelp will further depress our market. The market for roe on kelp is very price sensitive to over supply of product. When we exceed 400,000 pounds of total supply, we have experienced rapid and financially devastating price reductions for our roe on kelp.

Allowing Sitka sac roe permit holders to switch over to our product type would most certainly over supply our market for the foreseeable future and all stake holders of the roe on kelp permits will be negatively affected. I think it would be far wiser for the sac roe permit holders to address their own over production woes and not add to ours.

My other concern is that proposal **126** would set a precedence of other fisheries trying to change gear groups every time they experience poor market conditions. I do not want to seine sac roe herring but if proposal **126** were to pass, I would expect that I should be allowed to harvest sac roe if the roe on kelp market gets less valuable than the sac roe market.

I sincerely hope that it does not come to this and that we do not start changing gear groups and product types to chase what we perceive to be the hot market every year. While this scenario may sound comical, I fear that we are opening the door to the unthinkable, and I do not think anyone will be laughing.

While I respect that the sac roe permit holders have the right to petition for change, I feel that what they are proposing would be exceedingly detrimental to the hundreds of stake holders of the roe on kelp fishery. In closing, I am asking respectfully that proposal **126** be denied.

Sincerely,

A handwritten signature in black ink, appearing to be "Kurt Kvernvik", written over a horizontal line.

Kurt Kvernvik
PO Box 1081
Petersburg AK 99833
907 518 0086



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: Please provide to Commission for consideration as public testimony 11/6/15
Date: Thursday, November 05, 2015 1:04:37 PM
Attachments: [Svenson, Nels.pdf](#)
[Kvernvik, Kurt.PDF](#)
[image001.png](#)

Combination of letters and an e-mail here.

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: Wally and Colleen SWANSON [mailto:ak31e80ca@msn.com]
Sent: Thursday, November 05, 2015 11:00 AM
To: Lippert, Randy J (CFEC)
Subject: Please provide to Commission for consideration as public testimony 11/6/15

Bruce Twomley, Chairman
Alaska Commercial Fisheries Entry Commission
P. O. Box 110302
Juneau, Alaska 99811-0302

Subject: Regulation Change Proposal 126 New Sitka Sound ROK
Fishery.

Chairman Twomley:

Our group of seven Herring Roe on Kelp fishermen each remain strongly opposed to CFEC amending the current area for Northern Southeast Herring Roe on Kelp. (Exclude the Sitka Area)

While Mr. Kapp's intent of this proposal would possibly create an increase in his own personal fishing bottom line (Sitka Roe Herring), it simultaneously would further erode the market price for another entire group of Alaska fishermen (existing ROK permit holders).

Those of us who have purchased Herring Roe On Kelp permits, whether it is for the Northern or Southern districts, have experienced declining prices



from previous years. This fragile, narrow market is extremely sensitive to product volume and additional product added to this market, regardless of grade, will only serve to further the decline.

When we bought in to this fishery, we knew the uncontrollable risks that accompanied it but one factor that was relied upon was the fixed number of CFEC permits issued by law that would be generating product into this very limited market. Now you are about to consider changing all that to appease a totally different group of fishermen. We strongly urge you to stay above board, keep away from choosing sides, do the right thing and steer well clear of this manipulation by the proposal group.

Best Regards,

L E Swanson SSE ROK permit - Ph.#(907) 518-1207

L T Swanson SSE ROK permit - #(907) 772-3501

T L Swanson SSE ROK permit - #(206) 499-3790

Kerry Kirkpatrick NSE ROK permit - #(907) 321-5026

Chris Ponto NSE + SSE ROK permit - #(707) 477-6393

Matte Kandoll NSE + SSE ROK permit - #(907) 518-0375

J R Swanson NSE + SSE ROK permit - #(907) 518-0715



From: [Lippert, Randy J \(CFEC\)](#)
To: [Brown, Ben \(CFEC\)](#); [Twomley, Bruce C \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: roe on kelp/sac roe
Date: Wednesday, November 04, 2015 1:00:24 PM
Attachments: [image001.png](#)

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: Paddock, Sheri A (CFEC)
Sent: Wednesday, November 04, 2015 12:07 PM
To: Lippert, Randy J (CFEC)
Subject: FW: roe on kelp/sac roe

This gentleman was having a hard time sending you this email. So he sent it to me and I am forwarding it on to you.

Sheri Paddock
Admin Clerk IV
Commercial Fisheries Entry Commission
8800 Glacier Hwy., #109
Box 110302
Juneau, AK 99811
907-790-6964
sheri.paddock@alaska.gov

From: fishhead2u@comcast.net [<mailto:fishhead2u@comcast.net>]
Sent: Wednesday, November 04, 2015 12:05 PM
To: Paddock, Sheri A (CFEC)
Subject: Fwd: roe on kelp/sac roe

From: fishhead2u@comcast.net
To: randylippert@alaska.gov



Sent: Wednesday, November 4, 2015 6:57:04 AM
Subject: roe on kelp/sac roe

Mark Hammer
po box 582
Coupeville Washington
98239

Mr Lippert,

As a permit holder in the Northern Southeast herring spawn on kelp fishery I am strongly opposed to have Sitka Sound opened for roe on kelp for SAC ROE permit holders. My permit says(Northern Southeast herring spawn on kelp) not Hoonah Sound herring spawn on kelp, If any permit should be able to do ROE ON KELP in Sitka Sound it should be the people with Northern Southeast spawn on kelp permits . How can you just add a totally different fishery to a permit.? and if you can I would like to be able to use my Northern Southeast spawn on kelp fishery to do Sac Roe.. seems legit.

Sincerely
Mark A Hammer
po box 582
Coupeville Washington
98239

fishhead2u@comcast.net



From: [Lippert, Randy J \(CFEC\)](#)
To: [Twomley, Bruce C \(CFEC\)](#); [Brown, Ben \(CFEC\)](#); [Rickey, Douglas K \(CFEC\)](#); [Farrington, Craig W \(CFEC\)](#)
Cc: [Maake, Mele \(CFEC\)](#)
Subject: FW: ROK proposal
Date: Thursday, November 05, 2015 7:30:30 AM
Attachments: [image001.png](#)

Randy Lippert

Scanning Clerk

Commercial Fisheries Entry Commission

Phone: (907) 790-6945 Fax: (907) 790-7045

Email: randy.lippert@alaska.gov



From: mark saldi [mailto:marksaldi@mail.com]
Sent: Wednesday, November 04, 2015 7:06 PM
To: Lippert, Randy J (CFEC)
Subject: ROK proposal

Randy,

i will not be able to call in on friday.

i am against this proposal to allow sac roe permit holders to pound in sitka sound.

i've participapated in the hoonah sound pound fishery since the first year, 1991.

i live in skagway and have made 100% of my earned income from commercial fishing for the last 35 years.

the reasons i'm against this are;

- 1) put more product on an already flooded market,
- 2) once the market is gone, the sac roe boats can go back to siening, i'll have nothing to go back to.
- 3) i believe this will be a bad precedent to set. if this goes through, what fisheries will be next?

i live in a small coastal town with very little employment opportunities at that time of year.

i hope this proposal fails.

is it even legal to change an already established fishery?

thank you,

mark saldi

skagway, alaska



October 21, 2015

Randy Lippert
Commercial Fisheries Entry Commission
8800 Glacier Highway, Ste. 109
PO Box 110302
Juneau, AK 99801

Dear Mr. Lippert,

I smell a rat. As a herring pounder in both the northern and southern SE Alaska areas, I am dismayed and appalled by the direction both the Board of Fish and Commercial Fisheries Entry Commission have taken with regarding the proposal to allow the Sitka Sound seine permit holders to utilize open pounds. A Board proposal to allow just 52 permit holders to have the monopoly on an already struggling roe-on-kelp market, displacing the 200-300 pound fishermen already there? Absurd!

Be assured that if this proposal is put into place it will create a major negative impact on pounders in the herring roe-on-kelp fisheries not only in SE Alaska, but Prince William Sound and even beyond by flooding the market with a product that historically has met market demand by areas already well-established in SE AK. Sitka herring typically come earlier than both northern and southern areas; implementing this proposal would give a disproportional advantage to the new Sitka pounders and drive the other pounders and their product into the ground.

Secondly, by allowing one gear group to 'switch' to another gear group, you will be opening a Pandora's box and set a precedent through which other gear groups can choose to fish other methods to gain a higher priced product or to flood a particular market: ie, trollers can fish the salmon seine fishery, or tanner ring/hoop fishermen can use "alternative gear" - to make a more profitable product and "efficient" fishery. If a Sitka Sound seine permit holder wishes to participate in the herring roe-on-kelp fisheries, let him purchase a pound permit in the already allocated area(s) and do so according to established regulation. This Proposal 126 appears to be drafted to pad the pockets of a select few while destroying any and all other pound fisheries in Southeast Alaska.

I urge the Board to reconsider the ramifications of such lopsided regulation.

Sincerely

A handwritten signature in black ink, appearing to read "Donna Marsh".

RECEIVED
OCT 27 2015
CFEC

Kirt Marsh

PO Box 1421 • Petersburg, AK 99833 • Phone: 907-772-4889 • Fax: [Your Fax]
E-Mail: dwmarsh430@msn.com Web: [Web Address]



PC 16
78 of 79

Date: 21 October 2015

Randy Lippert
Commercial Fisheries Entry Commission
8800 Glacier Highway, Ste. 109
PO Box 110302
Juneau, AK 99801

Dear Mr. Lippert,

I am writing this letter because you sent notice asking all Northern Pound permit holders to respond. Not only northern pound permit holders should have been notified and solicited for response, but also the southern Pound permit holders - and all others involved in the herring fisheries - as they too will be affected as adversely as the northern area permit holders. Other fisheries could and will be impacted if this proposal is adopted as it will set a precedent of changing gear types in a given fishery.

Our pound fishery has seen a huge drop in the price of our product that has been directly impacted by the volume of product produced in the world. IF Sitka were allowed to pound also, they could and will flood the markets and drive the prices down even further than when we have a good year or two as it stands presently. They have the potential to produce so much more product than we ever could produce with all our current postage stamp sized fisheries combined.

It was mentioned that the tribe wants this fishery area reduced the last year we fished Hoonah sound the Sitka Sac Roe fleet fished in Salsbury Sound not far from our fishery and may have even intercepted our fish. We haven't had a fishery since that happened due to poor returns.

Pounders are also affected by the bait fisheries in Craig and Tenakee. The herring - per ton, as allocated to the bait fishery, are worth more than the sac roe fish; if it is market driven, then Sitka Sound sac roe seiners would best be served by switching from seined sac roe to a seined bait fishery. The bait itself is worth more than sac roe per ton, and the tonnage used in the pound fishery is currently worth more than bait; but the bait fishery is expanding and the pound fishermen take the brunt of it. They get 60% of the quota while 40% is allocated for pounding. If they don't take the bait, pounders are allowed to use what's left over.

I suggest the sac roe fishermen quit trying to kill the small pound fisheries we have now and develop their own markets: whether that be by expanding in world markets or fishing different times of the year and putting those stocks in the bait category also. Same gear type, different market.

This proposal will affect 52 sac roe permit holders and 200-300 pound permit holders in a market that is already struggling.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirt Marsh".

RECEIVED
OCT 27 2015
CFEC

Oct



PC 16
79 of 79

Randy Lippert

I am concerned that the Southern Southeast and Northern Southeast Herring spawn, on kelp fisheries could be hurt by allowing open pounding at Sitka.

The past two years our price for roe on kelp has dropped. It is very possible that a larger amount of product on the market could lower prices much more. I feel that the additional roe on kelp from Sitka could or will put us out of business.

The amount of roe on kelp from Sitka could be very large compared to the amounts now produced by the existing pounders.

Sincerely

Otis Marsh

P.O. Box 606

Petersburg AK 99833

907-772-3208

RECEIVED
OCT 22 2015
CFEC



Submitted By
Clyde Curry
Submitted On
2/18/2016 3:59:07 PM
Affiliation
Fisherman

Phone
907 518 0380

Email
Ccurry@gci.net

Address
PO box 572
Petersburg, Alaska 99833

Members of the Board of Fisheries,

I have participated in herring fisheries throughout Alaska for my entire fishing career. I started fishing herring in the early 1970's in Sitka before the fishery was limited. The Sitka fishery started as a bait fishery and then moved to a sac roe fishery. I am one of the few remaining initial permit issuants who is still actively fishing the Sitka herring fishery.

I oppose proposals 209 - 211 to establish herring as a forage fish. We know more about herring than any other species managed by the state and the people putting these proposals forward aren't scientists or managers. Let the managers do their jobs and let people fish as long as there is a sustainable harvestable surplus. Don't let the proposers wear you down, you have done a good job letting the department manage the herring fisheries.

I oppose proposal 126-2014-2015 to establish herring pounding in Sitka Sound. Both the herring sac roe fishery and the herring roe on kelp fisheries cater to very small markets. Neither of these markets are growing. Dumping more of either product on the market will not increase the price. I hope that you will listen to the people who hold permits in both of these fisheries. All of the Alaskans I fish with are opposed to this proposal. If it isn't broken, don't fix it.

Comments on proposal 216 to establish a pollock seine fishery in Southeast. I am one of the few people who have seined for pollock in Southeast. We experimented with this fishery back in the 1970's and found that it wasn't a good way to catch pollock. But I think that it is a good idea for the board and for the department to help fishermen start new fisheries. Newer fish finding equipment may start new fisheries that couldn't start before.

Clyde Curry

Petersburg, AK

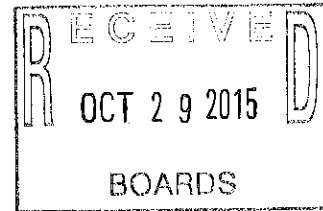
[ccurry@gci.net](mailto:c Curry@gci.net)



Clyde Curry
FM Jean C
PO Box 572
Petersburg, AK 99833

[ccurry@gci.net](mailto:c Curry@gci.net)
907 518 0380

October 21, 2015



Alaska Board of Fisheries
PO box 115526
Juneau, AK 99811-5526

Ref: Proposal 126

Dear Board of Fisheries members,

I am an original issue permit holder in the Southeast Alaska herring roe purse seine fishery.

I am a forty five year resident of Petersburg.

The Southeast sac roe fishery has seen ups and downs as have all fisheries and is currently in a down cycle. I do not believe the Board should make radical changes to a down fishery at the behest of a non-resident whom, to the best of my knowledge, holds neither a seine roe permit nor any other Alaska herring permit.

The closed-pound fisheries, which produce the same product as open pound, also have up and down cycles and would not be helped by more product on the market. Many of those permit holders are Alaska residents.

I urge the Board to not take unprecedented action on this matter.

Sincerely,

Clyde Curry



Submitted By
Don Johnson
Submitted On
10/30/2015 3:49:23 AM
Affiliation

Phone
907 262 7893

Email
donaldjohnson@alaska.net

Address
36160 Schultz Street
Soldotna, Alaska 99669

It is very unwise to even consider establishing a EEASTERN ALASKA AREA HERRING COMMERCIAL FISHERY for open pound herring spawn-on-kelp fishery in Sitka Sound (Proposal 126 from the 2014/2015 Cycle, was tabled at the 2014 Southeast Finfish meeting until the Statewide Finfish meeting, March 2016) and it should be deleted. Commercial herring fisheries should be banned statewide until Alaska's herring resources have recovered. Alaska's herring resources are currently the lowest on record. Alaska use to have billions of herring running through out its inlets and bays but those herring were commercially exploited until they were wiped out. Now we have king salmon which are half their regular size and that problem can be directly traced back to the lack of king salmon prey within our ocean. We should not be considering new KODIAK GROUND FISH COMMERCIAL FISHERIES WALLEYE POLLOCK because those fisheries will begin to catch near shore feeder king salmon and our king salmon are in enough trouble. We should not be looking to start new commercial Pollock fisheries in THE EASTERN GULF OF ALASKA GROUND FISH COMMERCIAL FISHERY: Consider establishing a state-waters walleye Pollock purse seine fishery (newly assigned Proposal 216) because those new fisheries will kill more king salmon with by-catch. All new commercial Pollock fisheries should be banned until they can prove they will not by-catch king salmon. We should not consider new commercial fisheries in THE EASTERN GULF OF ALASKA, PRINCE WILLIAM SOUND, COOK INLET, KODIAK, CHIGNIK, SOUTH ALASKA PENINSULA, AND THE BERING SEA-ALEUTIAN ISLAND AREAS GROUND FISH COMMERCIAL FISHERY for walleye Pollock jig fishery management plans with guideline harvest levels deducted from total allowable catch for the corresponding federal areas (newly assigned Proposal 218) because those new fisheries will by-catch more king salmon. These new fisheries should not be created until they can prove zero by-catch of king salmon.



Submitted By
Dr Alex Hills
Submitted On
11/18/2015 3:12:21 PM
Affiliation

I want to request that you comply with your original vote to have the next 2017 Upper Cook Inlet Meeting in Anchorage. I believe that an Anchorage meeting will provide the most opportunity for all affected parties to participate, for example, residents of the Mat Su Borough. Thank you.



Submitted By
Elijah Wessel
Submitted On
2/18/2016 12:27:58 PM
Affiliation

RE: BOARD OF FISHERIES STATEWIDE FINFISH AND SUPPLEMENTAL ISSUES
Proposal 203:

I am writing to submit public opinion on PROPOSAL 203 – 5 AAC 75.003. Emergency order authority. The early-summer red salmon run is of great importance to the prosperity of the city of Seward. Families in and around Seward depend on this run for winter meat.

Much of Seward's economy is based on tourism, and sportfishing is an enormous part of that. Without access to the red salmon run, tourism in Seward will suffer. Closure of this run to sportfishing directly hurts Seward and the folks who live here. Thank you for the opportunity to submit my opinion.



February 16, 2016

To: Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Support for Proposal 126

Dear Chairman Kluberton and Board Members,

I am a permit holder in the Sitka sac roe fishery and would like to give my support to Proposal 126. Please allow open pound roe on kelp as an alternative harvest method in the Sitka Sound sac roe fishery.

Thank you,

Gary Suydam



Submitted By
Gerald jr Sutphin
Submitted On
2/18/2016 4:36:57 PM
Affiliation
Fish guide

Phone
1-907-491-3083
Email
jrsfishing7wt@yahoo.com
Address
P.O. Box3451
32932 Nash Road
seward, Alaska 99664

Good day Sirs; My name is jr been a guide for the last 6 years, and am one of the two guides that fishes here in Resurrection bay. I would like to say a few things concerning prop. 203 along with the impact it will have to not only myself but to our locals, businesses and our state as well.

When I moved here in 1990 there was a couple of things that caught my attention. The ability to find not only work, but the great fishing here as well. The reason being that Resurrection bay was set up as a sport fisheries first and no commercial fishing as the methods and liberal catch limits show this. One of the untruths by the backers of prop. 203 is the fact that if not for them there would be no sockeye fishing here that is a lie gentlemen. When I moved here that year when I wasn't working I was fishing every chance I got. One of these places was where Salmon crk flowed out into the bay. By accident I discovered not only was there great dollye fishing in the creek but there was also hundreds of sockeyes traveling up from late May till Late June. I have never told any one till writing here as being a true fisherman would never tell anyone where I fished. and although the fresh water was closed to salmon fishing they were there in with the dollyes. I now live a mile up on Nash road and do alot of fishing on the creek and understand why those sockeyes were there. across from my house is a big rearing pond known as the swamp as well as numerous springs that come up and feed the creek and the sockeyes use these springs to spawn. Every year since I have fished this creek sockeyes as well as silvers spawn and use the swamp as a rearing place for their young. if you folks do not believe this I will be happy to show you anytime. Now I have heard the backers of 203 also state that the sport fishermen are harvesting up to 15000-20000 fish, another lie. I fish everyday either guiding or for myself during this run, a more believable number is at about 2000-3000 fish that is harvested. these people wish to shut us down because they are not getting escapment goals? Even though we target to wild stock yes we probly catch a few of "their" fish, but what about our wild stock runs? Do they also catch some of ours? They want have the ability to shut us down by their own words "to insure escapment goals" how would they feel if they could not fish for their hatchery fish until our wild runs met their escapment goals? seems what would be fair here is one of two things, #1 shut every one down till "escapment goals are met for our wild stock fish" or #2 everyone uses this "resource". Which by the way it is. I believe the state constitution states that resources belong to the people of alaska not just a special interest group. Now I am sure they will say they are their fish, I beg to differ, short of putting those fish in pens and raising them which by the way I believe is illegal in this state they are using our resources to raise them and until they are either caught in a net or on a rod do in fact being a resource belong to everyone in this state. if I am lieing how was that I was witness to all these sockeyes in 1990 -1992 when (and I have seen the reports) before the backers of 203 even started their program to "bring sockeyes into our bay"? that these fish were here. as far as the impact it will have not only to myself but also to the locals and businesses here in Seward? Well I will start by it will at least severly affect me to make a living as these fish are here weeks before everywhere else is open and not only people from anchorage, up north and the lower 48 come here to fish and to start filling freezers for the winter. and this is a great part of my income for the year Since our town depends on people coming here to fish what will the impact be to restaurants? Hotels?, stores that sell tourist mementoes? How about the sporting good stores for both selling trips as well as tackle? how about the city who has camping and parking spots? How about just saying it will affect everyone as people come to our town to FISH in the bay that is set up as a sport fishing fisheries not a comercial one. Does any one really think people will come here to watch seiners fish and they cant? Dont think so. I did not find out about this power grab until a couple of weeks ago as these backers of 203 did not want any of the people in this state to know anything till it was to late. I will not only be in Kenai this weekend but will happily be there in anchorage on May 18 to voice my opinion and have a few more things to say on this subject. Till then Thank You, and tight lines jr



Submitted By
Gloria Wik
Submitted On
11/5/2015 6:17:50 PM
Affiliation
None

Phone
907-398-3340
Email
msglowik@gmail.com
Address
PO Box 2444
Kenai, Alaska 99611

I would like to comment on the location of the statewide meeting to be held in March 2017. The schedule is showing the meeting to be held in Anchorage at the Sheraton. I would think it would benefit everybody connected to this issue to hold the meeting on the Kenai Peninsula. This is about the Upper Cook Inlet, right? Having meetings for us, about us and rules we have to adhere to would be most appreciate and I'm sure well attended if you held them in the area of concern, and that would be Kenai. Thank you.



February 2, 2016

Sent via fax & USPS

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax: (907) 465-6094

RE: I Support Proposals 209, 210 and 211

Dear Alaska Department of Fish and Game,

My name is Jaime Bricker. I was born and raised in Alaska. I'm 1/8 Aleut. I am in support of the Sitka Tribe of Alaska's suggested proposals to protect herring as a forage fish.

PROPOSAL 209 – 5 AAC 39.212. Forage Fish Management Plan

PROPOSAL 210 – 5 AAC 39.212 Forage Fish Management Plan

PROPOSAL 211 – 5 AAC 39.212. Forage Fish Management Plan

Thank you for your time and efforts made to protect our base marine food for the success of subsistence, commercial and sports fishing now and into the future.

Sincerely,

A handwritten signature in cursive script that reads "Jaime Bricker".

Jaime Bricker

PO Box 619

Skagway, AK 99840

Jaime.bricker@yahoo.com



Submitted By
James Carter Hughes
Submitted On
1/9/2016 1:46:08 PM
Affiliation
individual

Phone
907-738-3273
Email
carterhughes@hotmail.com
Address
507 Katlian St
Sitka, Alaska 99835

I am resubmitting these comments because I did not get a confirmation on my email of their submission and I was unable to get a response from the phone number that I called.

Chairman Kluberton and Members of the Alaska State Board of Fisheries:

My name is Carter Hughes and I am a salmon fisherman from Sitka Alaska. I troll for salmon, primarily king and coho salmon, in the waters of SE AK. I have participated in the Alaska fishing industry since 1984 and have been trolling since 1988. I own a 37 foot troller that is ported in Sitka. I am writing in opposition to Proposal 216, a proposal to establish a pollock seine fishery in the state waters of SE AK. This proposal is scheduled for consideration at the March 2016 BOF meeting in Anchorage. This proposal should be tabled until a meeting in Southeast Alaska a couple of years from now. There are currently two Commissioner's Permits that have been granted so that a test fishery can be conducted. There will not be any meaningful data available until the test fishery has been conducted for at least a year. There are king salmon bycatch concerns that must be addressed before an informed decision can be made on Proposal 216. King salmon is fully allocated in SE AK and is managed under an international treaty (the Pacific Salmon Treaty). This proposal is likely to have allocation concerns and be controversial. Proposal 216 should be discussed at a BOF meeting in SE AK where the local population can be more effectively engaged. It is too early for the BOF to take action on Proposal 216.

Thank you for your consideration and hard work on all of the fisheries issues that are presented to you throughout the state.

Sincerely,

James Carter Hughes

FV Astrolabe

Sitka

Jan 9, 2016



Submitted By
Joe Allen
Submitted On
2/18/2016 10:30:55 AM
Affiliation

~I am writing to submit public opinion on PROPOSAL 203 – 5 AAC 75.003. Emergency order authority. In Seward we have a hatchery supported Red Salmon run which provides a highly desired Alaskan sport fish harvest opportunity at the end of May through typically mid June. Many Alaskans visit Seward during this time in hopes of harvesting these fish during their short, but successful run. Closure of this specific run to sport fishing hurts Alaskan interests as well as the community based tourism associated with early season fishing during a slow time. The Alaskans that come to Seward to fish for the Reds support our area with their dollars. By doing a closure you take money away from locals who depend on this run to jumpstart the summer and get the food in. You also take away fish from the little guy who cannot afford to pay for Charters. This run gives myself and others that live here in this state a good way to get our Reds in without having to drive 200 miles round trip.

There are to my knowledge two local sport fish guides who lead clients on the flats during this time - their harvest logs are on file with the ADF&G. Closure of this fishery to commercial access may provide the numbers that the hatcheries desire. It is however safe to say that the numbers of salmon harvested by these two incredibly small family operated local guides is a non-issue to that end, while the fiscal damage done to them would be devastating.

In short - closing this specific red salmon run to public and commercial sport fish harvest will have a direct and damaging effect on the local economy in all sectors. You cannot take several hundred thousand dollars away from a small local economy without negative effects. In specific regard to the two local guides, they harvest a very small amount and return the money to our stores and restaurants. As a long time Alaskan I think that the state SHOULD be looking out for its citizens who for decades have used this for family food. Thank you for the chance to comment.



February 10, 2016

To: Board of Fisheries Tom Kluberton, Chair
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Support for Proposal 126

Dear Chairman Kluberton and Board Members,

Support Proposal 126 and allow permit holders in Sitka Sound to have an option of using open pounds to harvest spawn on kelp. I feel allowing the fishery to diversify the products coming from it will provide many future benefits. Killing less fish and enhancing the potential value of a fishery is an idea that should be easy to support. I understand and respect other areas producing roe on kelp are concerned with increased supply decreasing their fishery value but after reading the documents I don't believe this idea will cause the harm to existing fisheries they would anticipate. Increased roe on kelp production from Sitka Sound could help expand a declining market and generate more awareness and demand for the product which benefits everyone over time. One fishery should not be able to influence in the regulations of another based on market conditions. Salmon fishermen in Southeast can't limit pink production in Prince William Sound. Crab fishermen in Kodiak can't change quotas in the Bering Sea. Sitka Sound fishermen can't dictate how much sac roe is produced in Togiak, Kodiak, or even Canada, for that matter. Proposals similar to 126 have been brought to the Board for many years and the market conditions for the product have always taken center stage as a reason not to adopt this concept. Time has passed and the market has not shown improvement with status quo. Perhaps now it is time for a change.

Thank you for your time,

Joe Lindholm
Sitka Sound Seine Permit Holder



Submitted By
Joel Randrup
Submitted On
2/16/2016 4:48:44 AM
Affiliation
none

To the Board of Fish,

I am opposed to proposal 126-5AAC 27.XXX. New Section. Establish a commercial open pound herring spawn on kelp fishery in Sitka Sound by converting Sitka Sac Roe Herring permits to Pound Permits. I am unable to give testimony in person because I am fishing, but appreciate the opportunity to email these written comments.

I am a commercial fisherman from Petersburg and I own both southern and northern herring pound permits. This proposal would have a negative economic effect on the existing northern and southern fisheries because it would flood the market with product and have a downward pressure on prices. This is already a very sensitive fishery with regard to volume and price. We see this problem when we have both northern and southern pound fisheries in the same season, which then has lower prices for product the following year.

The test fishery referred to in the proposal is not a fair comparison to the current rules and regulations of current pound fishery. The test fishery was allowed to use a massive amount of blades of kelp as compared to current regulations so the inference that it would increase the value is not accurate in my opinion. A person might make a case showing the downward pressure on prices by introducing the test fishery product to the roe on kelp market.

Another issue with this proposal is fairness to current herring pound permit holders that have loans for permits and/or gear. I entered into this fishery with the reasonable expectation of building a business plan to participate and make a living from it. I don't know if it is legal for one permit group to decide to change into another permit group because of market conditions or other reasons? I can think of all sorts of permits I would like to change into others but this idea is, of course, not reasonable.

In closing, I believe one of the reasons the CFEC is a very valuable asset to the commercial fishing industry is because it can be a way to slow down and carefully look over issues such as this proposal. I ask the BOF to please acknowledge the work the CFEC did looking into this proposal and that the process worked. Although I haven't seen comments at the time of writing this email, I believe we would be stuck with this proposal if we did not have the CFEC in its current form. I think we all agree there could be efficiencies within the body, but it works as a separate organization and should not be absorbed into Fish and Game.

Thank you,

Joel Randrup



Submitted By
Larry Demmert
Submitted On
2/15/2016 9:00:19 PM
Affiliation
Southeast Roe on Kelp producer

Phone
207-941-9442
Email
Alaskapremium@frontier.com
Address
Pob 1132
306 9th str
Craig, Alaska 99921

I am writing about proposal 126, open pound roe on kelp in Sitka Sound.

First thing I would like to point out is that neither Darryl or Ryan Kapp have a permit in the Southeast Sac roe fishery, or are they Alaska residents and they are not Alaska Native.

If you allow this fishery to happen you will be putting hundreds of Alaska residents and many Alaska Natives out of business, in my mind this is not how the Board of Fish is supposed to work, putting the benefit of a few permit holders above hundreds of other permit holders, if it happens then something is wrong with this process.

I have 25 relatives in the southern southeast fishery alone, This fishery has a high number of natives that participate, the Klawock-Heenya Native corp was instrumental in creating this fisheries.

If you create this fishery you will eliminate both Roe on Kelp fisheries in Southeast Alaska.

There is no other market for this product! If you are being told this you are being lied to!

I have participated in this fishery for 23 years, I have sold it to buyers and have marketed it myself for several years. This is a finite market of 1 million pounds or less. Once the harvest exceeds this number the market crashes and stays down for several years. Canada has a similar fisheries as the one being proposed and **only a few of the permits there actually participate in the fishery**, due to low prices and the unstable market, also they produce lower quality product (like the product that would come out of Sitka) if there was this alternative market, it would be filled by Canada.

There is a fishery in California where they can participate, the Kapps have or had permits in the California roe on kelp fishery which produces low grade roe on kelp, they can go back there where they have permits and leave the Alaska fishery alone **where they currently do not own a permit in either fisheries!**



Submitted By
Mark Cooley
Submitted On
12/8/2015 11:12:34 AM
Affiliation
Lodge Owner

Phone
517-403-1285
Email
cohuntexp@gmail.com
Address
9646 town rd
parma, Michigan 49269

I would like to see the ability to keep 1 or 2 kings per client. I own the Talstar Lodge on the Talachulitna River and it has been catch and release for a few years. The runs on the Tal seem to be very strong and as I just purchased this Lodge in 2013 it has been very hard to make it w/out the king season. The good thing about the Tal is there are only 2 Lodges that operate on the river right now and we are both small so even with a 2 fish limit the amount of Kings that would be harvested would be very small. I have been fishing that river for over 10 yrs and it's great fishing is the reason I purchased the Talstar but it is impossible to book clients when there is no retention for the client. Please look at this and allow a small number of Kings to be kept. Thank You Mark Cooley



Submitted By
Matthew Alward
Submitted On
2/14/2016 3:00:22 PM
Affiliation
Alward Fisheries LLC

Tom Kluberton, Chairman
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: Support for Proposal 203 regarding Emergency Authority for Brood stock & Spawning Requirements

Chairman Kluberton and Board Members,

I'm a salmon seiner and halibut fisherman from Homer and I support proposal 203, which would give the Alaska Department of Fish and Game emergency order authority to close a special harvest area or portion of a special harvest area to sport fishing when commercial harvest within that special harvest area has been closed to achieve hatchery brood stock requirements and escapement goals.

Hatcheries benefit all user groups including sport, commercial, personal use, and subsistence, and this proposal would give ADF&G the tools they need to ensure salmon enhancement in our future. The continued success of our hatchery programs requires both brood stock for eggs and economic harvest of a portion of the return, and in order to protect the brood stock and cost recovery goals ADF&G needs to have the ability to not only shut down the commercial sector, but sport as well.

Proposal 203 gives the State the ability to ensure that future returns of hatchery fish are here for the benefit of all user groups for generations to come and I support it.

Sincerely,
Matthew Alward
Owner-Alward Fisheries LLC



Submitted By
Michael Chance Miller
Submitted On
2/18/2016 9:49:46 AM
Affiliation

RE: BOARD OF FISHERIES STATEWIDE FINFISH AND SUPPLEMENTAL ISSUES
Proposal 203:

I am writing to submit public opinion on PROPOSAL 203 – 5 AAC 75.003. Emergency order authority. In Seward there exists a hatchery supported Red Salmon run which provides a highly desired local sport fish harvest opportunity at the end of May through typically mid June. Many locals visit Seward during this time in hopes of harvesting these fish during their short, but successful run. Closure of this specific run to sport fishing hurts local interest as well as the community based tourism associated with early season fishing.

There are to my knowledge two local sport fish guides who lead clients on the flats during this time - their harvest logs are on file with the ADF&G. Closure of this fishery to commercial access may provide the numbers that the hatcheries desire. It is however safe to say that the numbers of salmon harvested by these two incredibly small family operated local guides is a non-issue to that end, while the fiscal damage done to them would be devastating.

In short - closing this specific red salmon run to public and commercial sport fish harvest will have a direct and damaging effect on the local economy in all sectors. In specific regard to the two local guides, this could shut them down entirely, and based on their percentage of harvest being obscenely negligible, this is a cold hearted shame.



Submitted By
Michelle Myers
Submitted On
1/28/2016 4:25:08 AM
Affiliation

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chugiak, Alaska 99567

Under supplemental issues

People make a living selling fishing to visitors. To get visitors we need a plan in place for visitors to get at least 2 licenses for each of the different kinds of fish, Kings, Sockeye, etc.

Next priority is subsistence, all subsistence is not the same, there needs to be levels. Living in and around Anchorage, Fairbanks, Kenai, type areas, means you are not living the same level of subsistence as someone in Anvik (smaller villages served once a week by planes and no roads).

Residents, this is why we Live here!, need to plan for an amount, it doesn't have to be a huge give away.

Commercial, helps the economy and this is where balancing all needs comes in, each boat needs to make enough to make it worth while to go out. Long term has been less and less returns, we have to stay on top of the number of boats.

ByCatch, my definition - the KILLING and WASTING of the unwanted fish and other marine creatures caught during commercial fishing for a different species. STOP wasting bycatch. All fish caught, that have no reasonable chance to make it, should be processed. Boat receives, whichever is less, the price per pound of what they are licensed to catch or the price per pound of what that fish is worth. All bycatch to be taxed at 70% maybe 80%? Part of that tax money is to be used to PAY those licensed to commercial fish that species. Reduce the commercial quota for that fish by the amount caught as bycatch.

Solution:

All fish caught, that have no reasonable chance to make it, should be processed. Boat receives, whichever is less, the price per pound of what they are licensed to catch or the price per pound of what that fish is worth. All bycatch to be taxed at 80%. A portion at least 50% of the tax money is to be used to PAY those licensed to commercial fish that species. Reduce the commercial quota for that fish by the amount caught as bycatch.



Submitted By
Mike Cole
Submitted On
2/2/2016 2:18:13 PM
Affiliation
1976

Phone
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michaelgcole@mac.com
Address
1652 Glacier Avenue
Juneau, Alaska 99801

My Comment Regards the follow:

PROPOSAL 205 – 5 AAC 75.020. Sport fishing gear. Clarify that a bead not attached to a hook is an attractor, and not a lure or fly, as follows:

In this proposal the amendment will change the definition of artificial fly to include a plastic bead not attached to bare hook. This would make it legal for the use of a bead above a bare hook legal in fly only water. This rig is clearly not a fly rig under traditional standards, nor does any fishing it claim it to be so.

If we allow this rig to be legal in fly only waters, then shouldn't anglers using equipment other than fly rod and reel be allowed to fish those same waters? For example, a non fly angler should be allowed to use a spinning rod with a bobber or float with a bead and bare hook as methods and means in fly only waters. Overall this would be more of an equal opportunity for all anglers.

If we are trying to keep "fly fishing only" areas to fly fishing only, then one of two things should be considered. Make these are fly only and ban beads not attached to the fly all together. Or revise the definition to allow beads to be free sliding on the leader to a fixed point or pegged to a fixed point no more than 2" of the hook. A bead may be used in in "fly only" water only if it is free sliding or pegged to a fixed point no more than 2" from a artificial fly tied under traditional standards as defined. A hook that has a thread wrapped shank qualifies as a fly tied by traditional standards and is legal to fish with a beads (fixed or freesliding) in fly only waters.

Just a thought. Evidence surely shows that beads when fished properly have a much lower mortality rate on fish released than that of egg pattern flies such as glo bugs.

More importantly, I feel making single barbless hooks mandatory as part of method and means when it comes to fishing with beads. At least it should be investigated as the damage done to fish with barbless hooks is far less than that of barbed hooks. When you see pictures of trout from rivers like the Moraine or Agulapak, many of these fish have mangled jaws and mandibles. It is often a case of a fish being caught too many times or anglers using barbs or semi barbed hooks (barb not fully crushed at time of conversion.) When I guided in the Bristol Bay Area, I saw countless fish in barbless hook waters that had broken off from the previous angler and had their bead rig in their mouth. Almost always the hooks were still barbed. Either anglers/guides are oblivious to the law or they have reckless disregard. Either way its still illegal. Maybe sportfish penalties need to be raised?

See Washington State regulations on barbed hooks for guidance.

Thank you for your time and consideration

February 18, 2016

Mr. Tom Kluberton, Chairman
Mr. John Jensen, Vice Chairman
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Proposal 216, Establish a state waters walleye pollock purse seine fishery in Southeast Alaska

Dear Chairman Kluberton, Vice Chairman Jensen, and Board Members,

We urge you to reject the proposal for a new purse seine fishery for walleye pollock in Southeast Alaska (Proposal 216).

A Commissioner's permit was issued for a test purse seine fishery for pollock in Cook Inlet in 2014. A thorough evaluation of the results of that test fishery is needed before larger quotas or additional test-fisheries are considered. The limited detail of the test fishery results reported in the Gulf of Alaska (GOA) Pollock Workgroup¹ response raises concerns about Chinook bycatch and an inefficient, low value use of the pollock resource. The GOA Pollock Workgroup reported 32,000 lbs (~16 tons) of pollock were harvested and 45 Chinook salmon were incidentally caught as bycatch in the 2014 test purse seine fishery. For comparison, the 2014 GOA trawl pollock fishery harvested 142,633 tons with 10,877 bycatch Chinook salmon². The rate of bycatch in the trawl fishery was ~1 Chinook for every 13 tons of pollock while the rate of bycatch in the test purse seine fishery was quite high at ~1 Chinook for every 0.36 tons of pollock. If a pollock seine fishery is allowed to develop, this additional source of Chinook salmon bycatch may limit the pollock catches of participants in the existing federal and parallel state waters GOA pollock trawl.

Aside from the troubling Chinook bycatch in the purse seine fishery, the Cook Inlet test fishery also lacked sizable pollock suitable for any market other than bait. As reported, pollock were too

¹ Alaska Board of Fisheries. 2015. Gulf of Alaska Pollock Workgroup. Alaska Department of Fish and Game, Final Report, July 2015.

² Dorn, M., K. Aydin, D. Jones, A. McCarthy, W. Palsson, and K. Spalinger. 2015. Chapter 1: Assessment of the Walleye Pollock Stock in the Gulf of Alaska. North Pacific Fisheries Management Council Gulf of Alaska Stock Assessment and Fishery Evaluation, December 2015, Anchorage, AK.



small for fillets and 20% were sold as bait¹. Bait is one of the least valuable products to come from pollock. For example, the 2014 first-product wholesale prices of deep-skin fillets and other fillets were \$1.595 and \$1.304 per pound, respectively, while “other products” including bait were \$0.627 per pound³. Catching small pollock for bait is a waste of a potential high-value product. If allowed to grow, adult female pollock would not only offer adequate fillets, but also roe (2014 value of \$2.787 per pound). Available pollock in Southeast Alaska may not be suitable for large-scale, economically valuable harvests: pollock caught in outside waters of Southeast Alaska during the 2015 bottom trawl survey were mostly age-2 fish, with lengths around 35 cm, and larger pollock (> 55 cm length) were rare². A commercial fishery on low-value, small Southeast Alaska pollock just does not make sense.

Pollock is an important forage fish species in Southeast Alaska. Prior to opening any fishery, an assessment should be made of the potential impacts to the Southeast Alaska food web and predators that rely on the pollock stock. Steller sea lions, in particular, are highly reliant on finding predictable concentrations of pollock to maximize their hunt when targeting prey^{4,5}. Reduced pollock prey availability may induce Steller sea lions to shift to other forage fish such as herring, cod, or salmon, potentially increasing interaction and competition with those fisheries. Pollock are also a primary prey item in the diets of Pacific halibut⁶ and Chinook salmon⁷.

It is unclear how prospective purse-seine vessels would identify and target pollock schools to ensure a desirable pollock product with low bycatch. Differentiating between schools of similarly sized fish, like pollock and herring, using sonar is difficult. Consequently, when NMFS performs acoustic surveys, constant ground-truthing by directly sampling the fish with trawls is necessary to determine species^{4,5}. In a commercial purse-seine fishery, there is a risk that misidentification of sonar signals could result in setting nets on herring schools, resulting in high

³ Fissel, B., M. Dalton, R. Felthoven, B. Garber-Yonts, A. Haynie, A. Himes-Cornell, S. Kasperski, J. Lee, D. Lew, and C. Seung. 2015. Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska and Bering Sea/Aleutian Islands Area: Economic Status of the Groundfish Fisheries off Alaska, 2014. North Pacific Fisheries Management Council, Anchorage, AK.

⁴ Sigler, M. F., D. J. Tollit, J. J. Vollenweider, J. F. Thedinga, D. J. Csepp, J. N. Womble, M. A. Wong, M. J. Rehberg, and A. W. Trites. Steller sea lion foraging response to seasonal changes in prey availability. *Marine Ecology Progress Series* 388: 243-261.

⁵ Gende, S. M., and M. F. Sigler. 2006. Predictability of Prey Available to Steller Sea Lions in Southeastern Alaska. In A. W. Trites, S. K. Atkinson, D. P. DeMaster, L. W. Fritz, T. S. Gelatt, L. D. Rea, and K. M. Wynne (editors), *Sea lions of the world*. Alaska Sea Grant Program Report AK-SG-06-01, University of Alaska, Fairbanks.

⁶ Yang, M. S. 1993. Food habits of the commercially important groundfishes in the Gulf of Alaska in 1990. US Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Alaska Fisheries Science Center. <http://www.afsc.noaa.gov/publications/afsc-tm/noaa-tm-afsc-22.pdf>

⁷ Davis, N. D., Volkov, A. V., Efimkin, A. Y., Kuznetsova, N. A., Armstrong, J. L., & Sakai, O. (2009). Review of BASIS salmon food habits studies. *N. Pac. Anadr. Fish Comm. Bull.*, 5, 197-208.



bycatch hauls of herring. Additionally, setting nets on a school of small or juvenile pollock would result in large hauls of undesirable sized fish.

If a purse seine fishery for pollock were to be established, 100% observer coverage must be included in order to avoid unreported or under-reported herring bycatch and mortality, and any herring caught must be counted towards set herring bycatch caps. Even with 100% observer coverage paid by the fishermen, it would still be costly to the state for coordination, data collection/analysis, and management.

If a purse seine fishery of pollock is to be pursued in Southeast Alaska, an improved Southeast Alaska pollock stock assessment informed by acoustic surveys of inside waters is needed before setting any catch limits and allowing a fishery. The Southeast Alaska pollock biomass estimated by the current NMFS trawl survey in outside waters are highly uncertain with large confidence intervals, and the 2015 survey east of longitude 140 °W showed a sharp decline of pollock abundance⁸. Further, the stock structure of pollock in Southeast Alaska is poorly known, but it has been suggested that pollock populations in individual fjords make up a larger meta-population⁸. This type of population structure would be susceptible to localized depletion. Coordinating acoustic surveys in conjunction with the crab pot surveys and the sablefish longline surveys, or extending established outside waters summer acoustic surveys to include state waters, could yield adequate data for pollock biomass estimates. We realize, however, that additional surveys and equipment raises budgetary concerns for the State of Alaska, and feel that, with economic uncertainty and cuts to established fisheries management, perhaps now is not the time to introduce a new fishery.

A purse seine fishery for pollock in Southeast Alaska at this time is ill-advised. Because there is no room in the market to compete with pollock from the GOA and eastern Bering Sea groundfish fisheries, it is probable that much of the catch will be relegated to lower-value bait or fishmeal. Further, there is potential for high salmon and herring bycatch, and the Southeast Alaska pollock biomass estimates are highly uncertain. Thank you for taking our comments into consideration when making your decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Warrenchuk".

Jon Warrenchuk, Senior Scientist and Campaign Manager
Oceana

⁸ Bailey, K. M., T. J. Quinn II, R. Bentzen, and W. S. Grant. 1999. Population Structure and Dynamics of Walleye Pollock, *Theragra chalcogramma*. *Advances in Marine Biology* 37: 179-255.



PROPOSAL 194

5 AAC 28.650.

Closed waters in the Bering Sea- Aleutian Islands Area

Presented by: Unalaska Native Fisherman's
Association and Qawalangin Tribe of Unalaska

February 2016



Proposal 194

5 AAC 28.650.

- Close all waters of Unalaska Bay to commercial fishing for groundfish with pelagic trawl gear, as follows:
- (b) The waters of Unalaska Bay are closed to groundfish fishing with pelagic trawl gear, [as follows:] south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. to Cape Cheerful at 54° 01' N. lat., 166° 40' W. long.
 - [(1) FROM JUNE 10 THROUGH AUGUST 31, SOUTH OF A LINE FROM CAPE KALEKTA AT 54° 00.50' N. LAT., 166° 22.50' W. LONG. TO CAPE CHEERFUL AT 54° 01' N. LAT., 166° 40' W. LONG.];
 - [(2) BEGINNING SEPTEMBER 1 UNTIL THE CLOSURE OF THE PARALLEL BERING SEA WALLEYE POLLOCK 'B' SEASON, SOUTH OF A LINE FROM **CAPE KALEKTA** AT 54° 00.50' N. LAT., 166° 22.50' W. LONG. TO A POINT NEAR HOG ISLAND AT 53° 55.42' N. LAT., 166° 34.25' W. LONG. TO A POINT IN BROAD BAY AT 53° 55.42' N. LAT., 166° 38.80' W. LONG.; FOR THE PURPOSES OF THIS PARAGRAPH, "PARALLEL BERING SEA WALLEYE POLLOCK 'B' SEASON" MEANS THE PARALLEL SEASON CONDUCTED FROM JUNE 10 THROUGH NOVEMBER 1]



Unalaska/Dutch Harbor Alaska

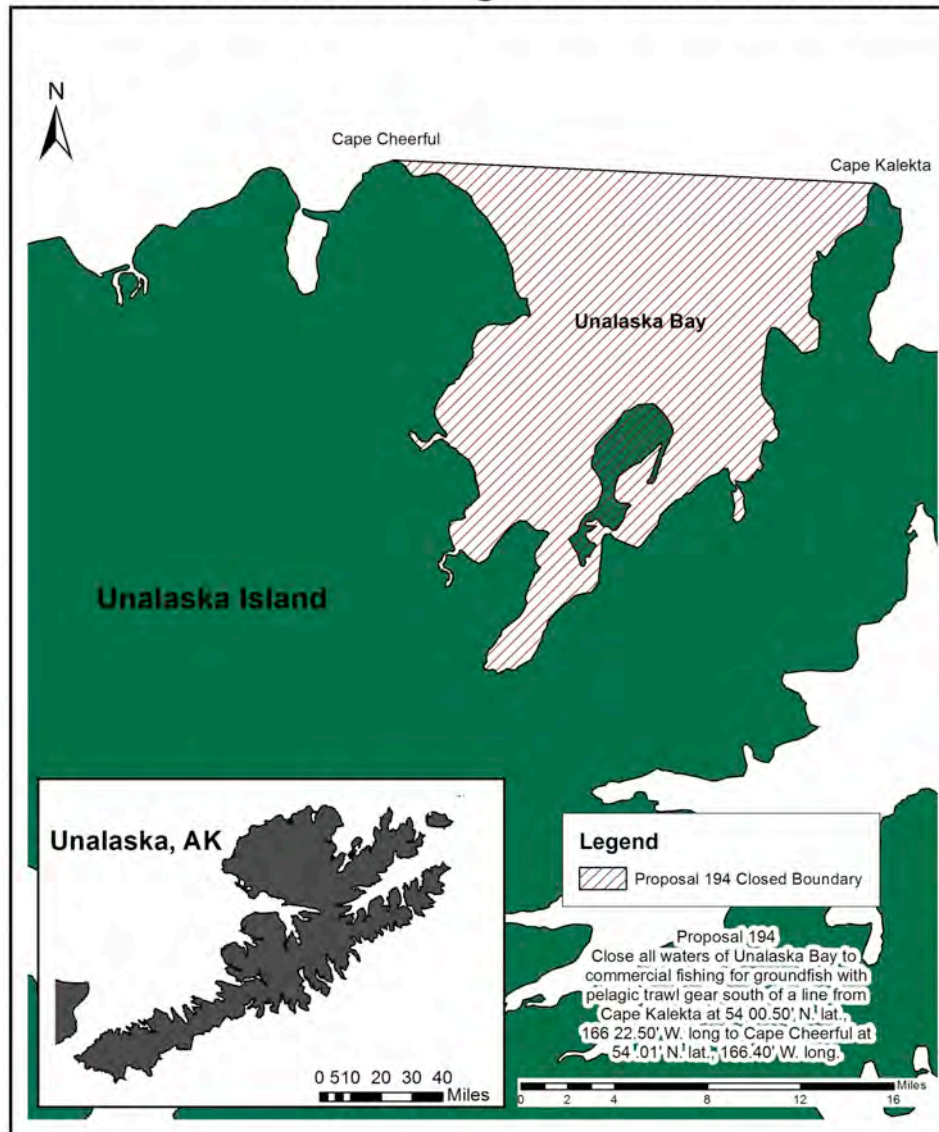




Proposal 194

Proposal 194 - 5 AAC 28.650. Closed Waters in the Bering Sea-Aleutian Islands Area

5 AAC 28.650.





Proposal 194

5 AAC 28.650.

Primary Concerns:

- The State of Alaska opens these waters to trawling from September 1 to November 1 as a parallel fishery to the eastern Bering Sea catcher vessel Pollock fishery that is managed by NMFS.
 - Large-scale trawling in Unalaska Bay has unacceptably impacted an area traditionally used by subsistence, sport, and smaller non-trawl commercial fishers and hunters since 2002.
 - There is no cap on what amount of the B season pollock trawl quota can come out of Unalaska Bay.
 - According to residents of Unalaska Bay, pressure by the pollock trawlers has displaced or impacted most subsistence species: salmon, halibut, herring, crab, and sea mammal hunting.
 - Largely known that habitat destruction occurs where trawl gear touches the seafloor
 - Large trawlers are built for fishing outside of bay in stormy weather; whereas locals are sacrificing their safety by fishing outside of Unalaska Bay to feed their families for subsistence.



Proposal 194

5 AAC 28.650.

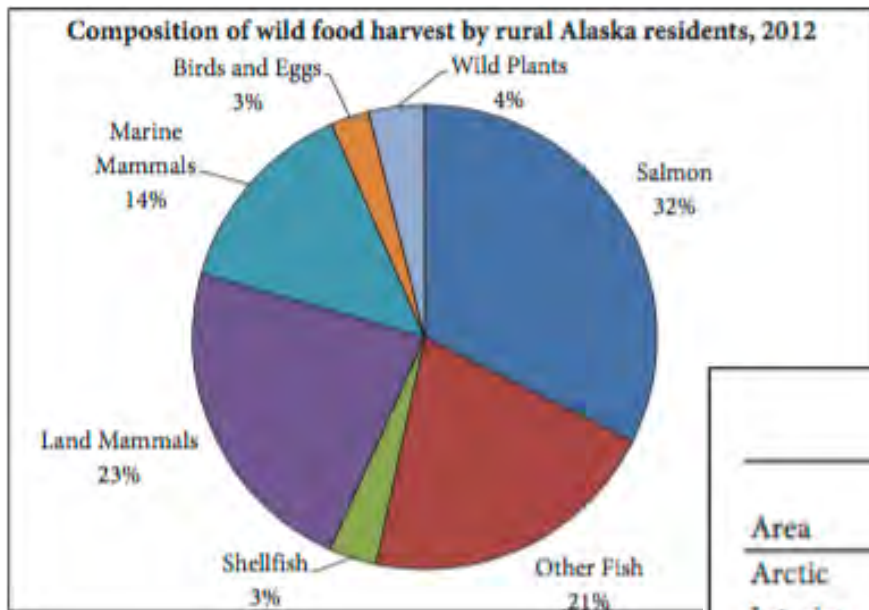
Looking back in the recent past...

- In 2010 the board closed inner Unalaska Bay during the Bering Sea pollock B season and allocated outer portion of Unalaska Bay.
- UNFA board members, Qawalangin Tribal members, and others participated in the similar proposal 194 (Proposal 162) in the meetings held on February 26th- March 4th, 2013.
 - Board of Fish carried the proposal as amended to move the trawl start date from August 1st to September 1st in Unalaska Bay.

Proposal 194

5 AAC 28.650.

Subsistence & Harvest in Rural Alaska



Source: ADF&G Division of Subsistence, 2012

Roughly ~70% of marine related resources are harvested by rural Alaska residents.

Area	Harvesting game	Using game	Harvesting fish	Using fish
Arctic	63%	92%	78%	96%
Interior	69%	88%	75%	92%
Southcentral	55%	79%	80%	94%
Southeast	48%	79%	80%	95%
Southwest	65%	90%	86%	94%
Western	70%	90%	98%	100%
Total rural	60%	86%	83%	95%

Source: ADF&G Division of Subsistence, 2012

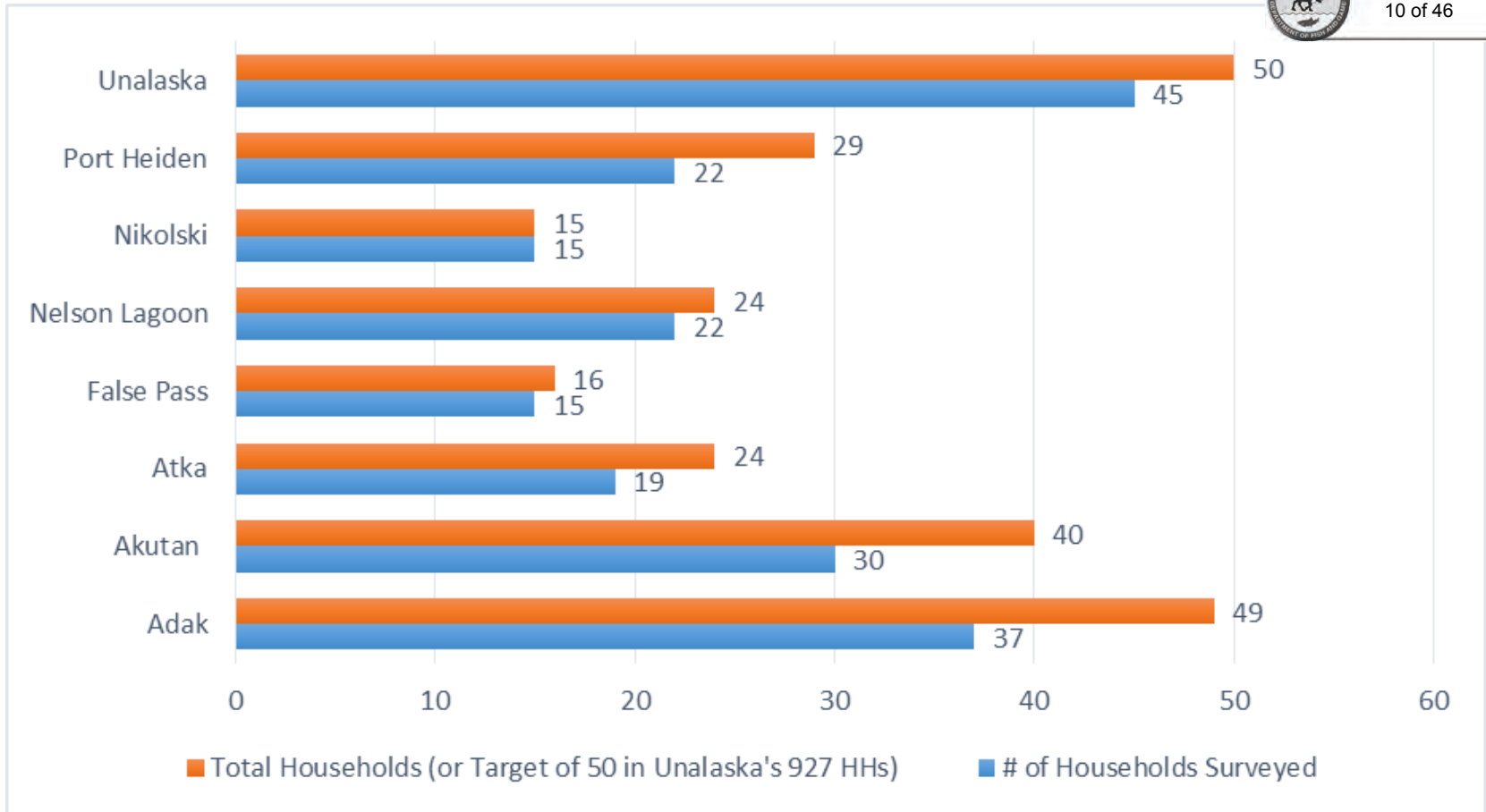
A way of life...



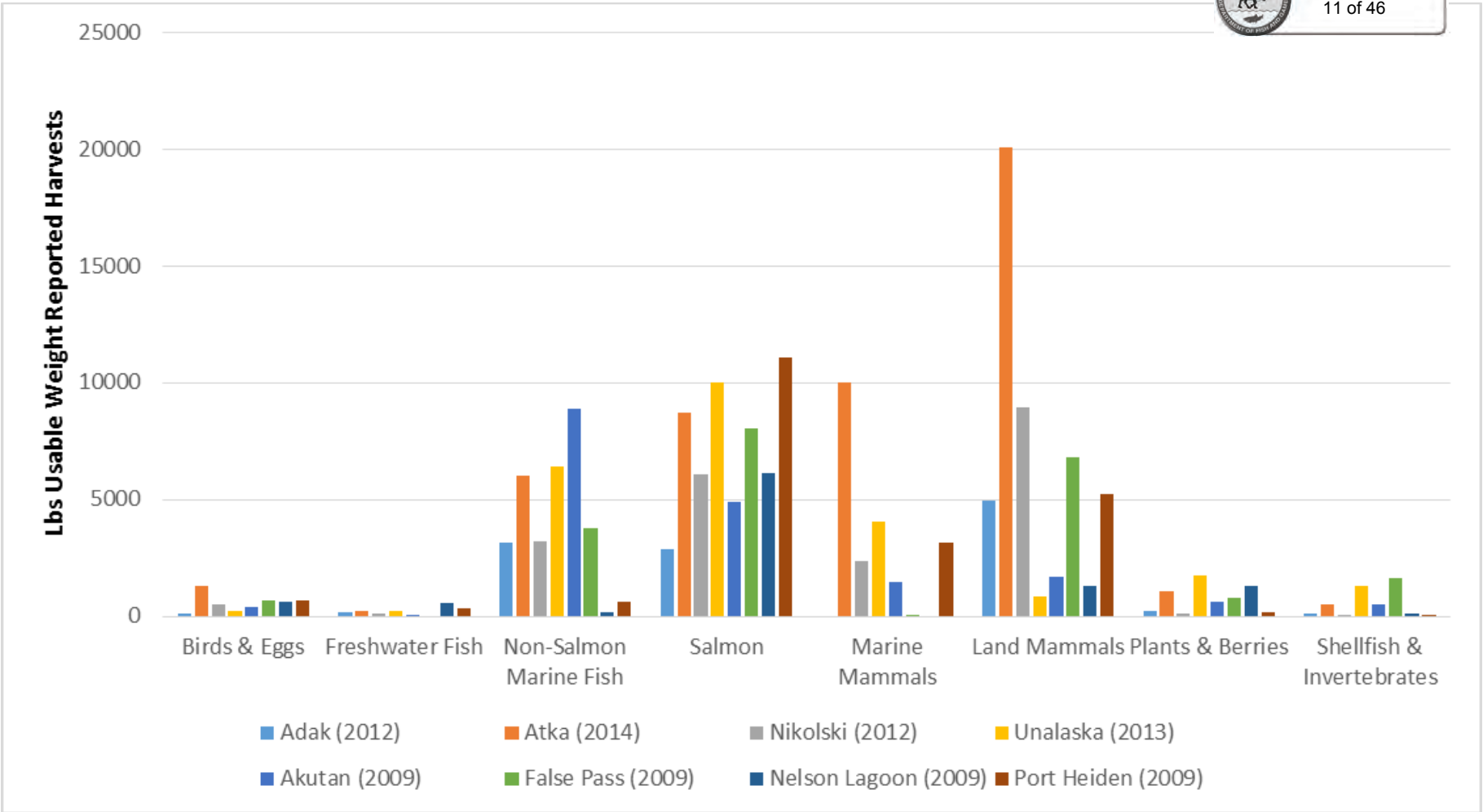


INFORMATION FOR PROPOSAL #194 PRELIMINARY SUBSISTENCE DATA

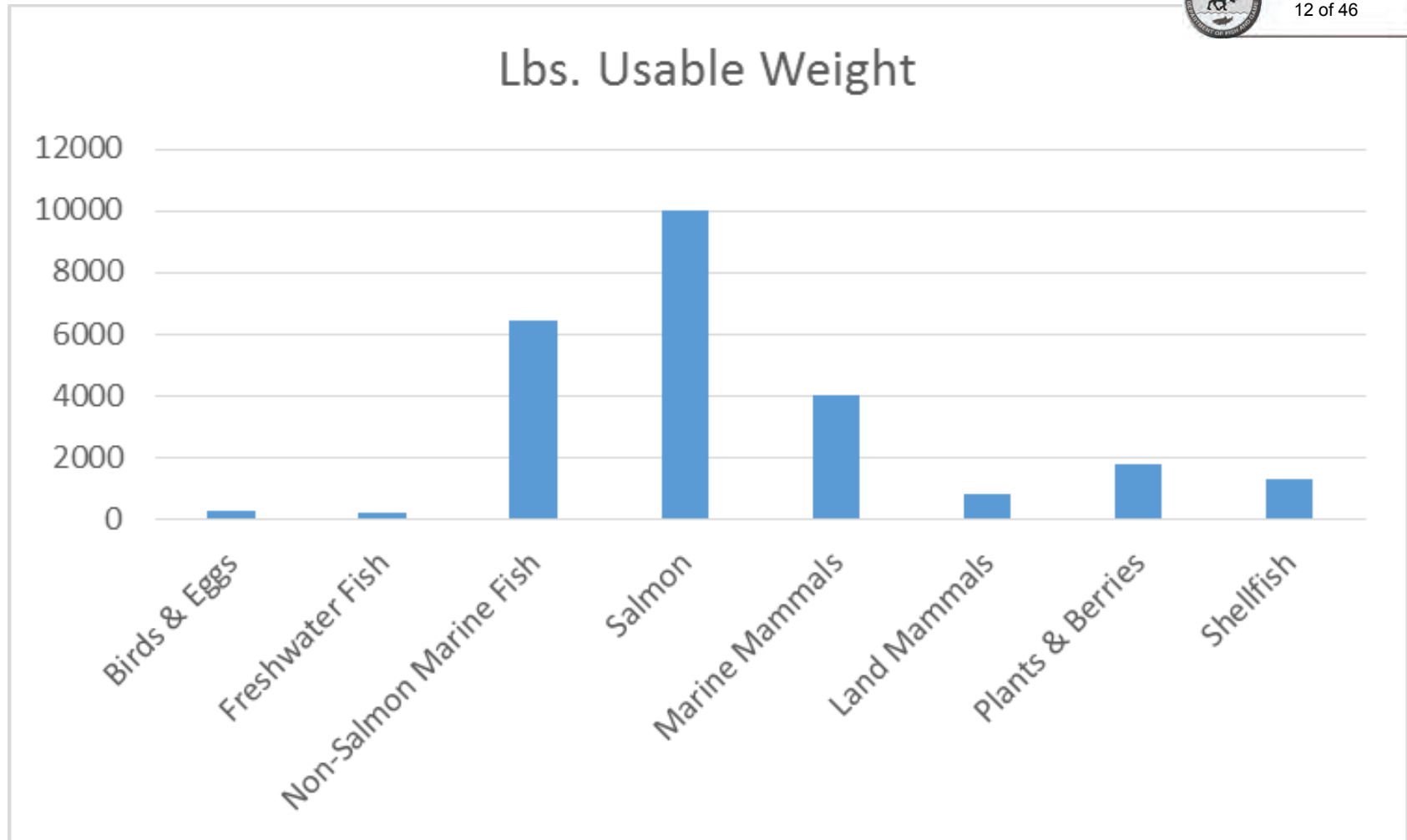
K. Reedy, In prep. Aleutians Islands Salmon & Other Subsistence Harvests. USFWS Office of Subsistence Management Grant (#12-420)



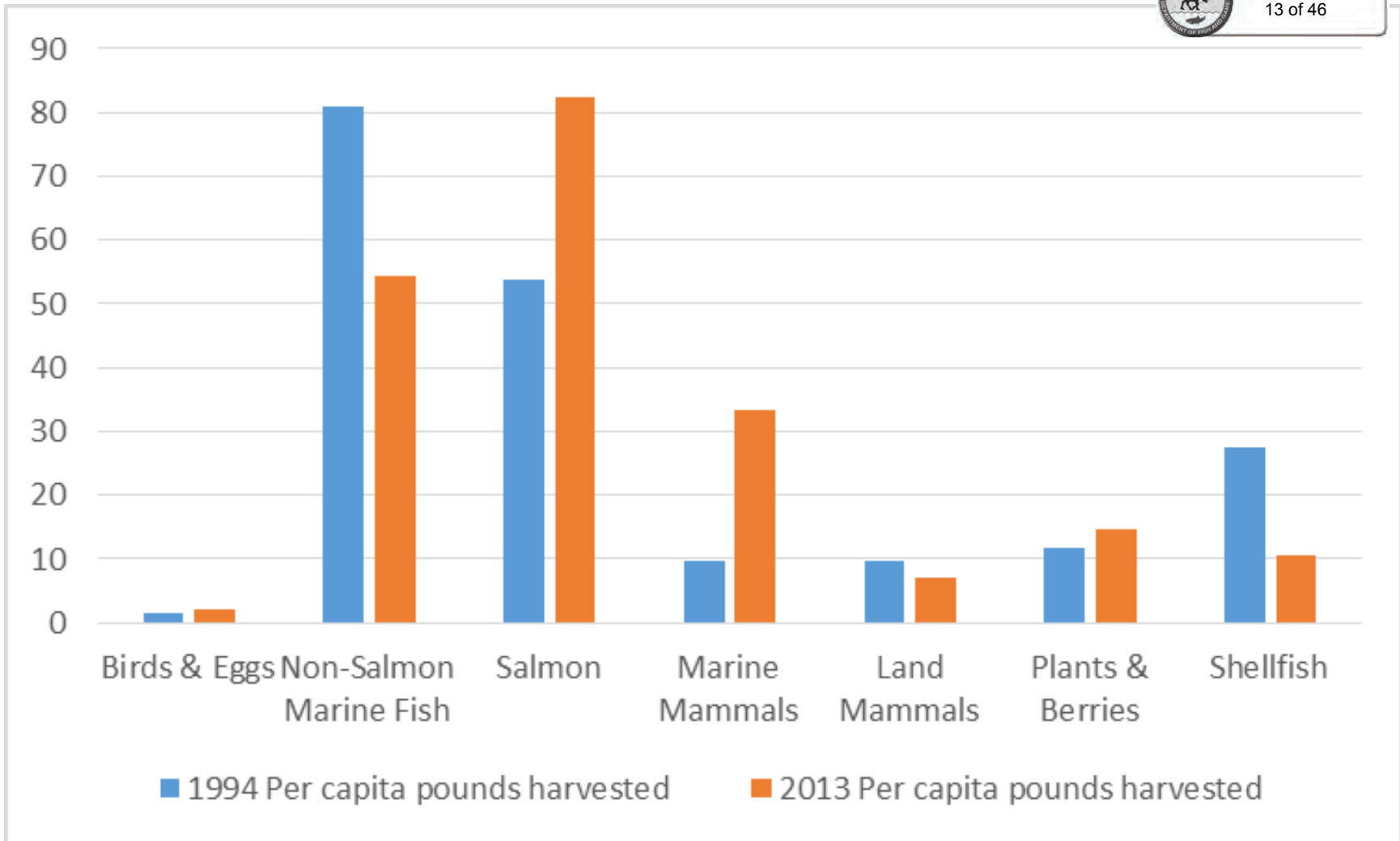
Unalaska was surveyed in 2014 for 2013 harvest and sharing data And interviews about the subsistence economy. 45 of 50 targeted resident households completed the survey.



Unalaska's harvest data are shown for the 45 households relative to the other seven surveyed communities in pounds usable weight.



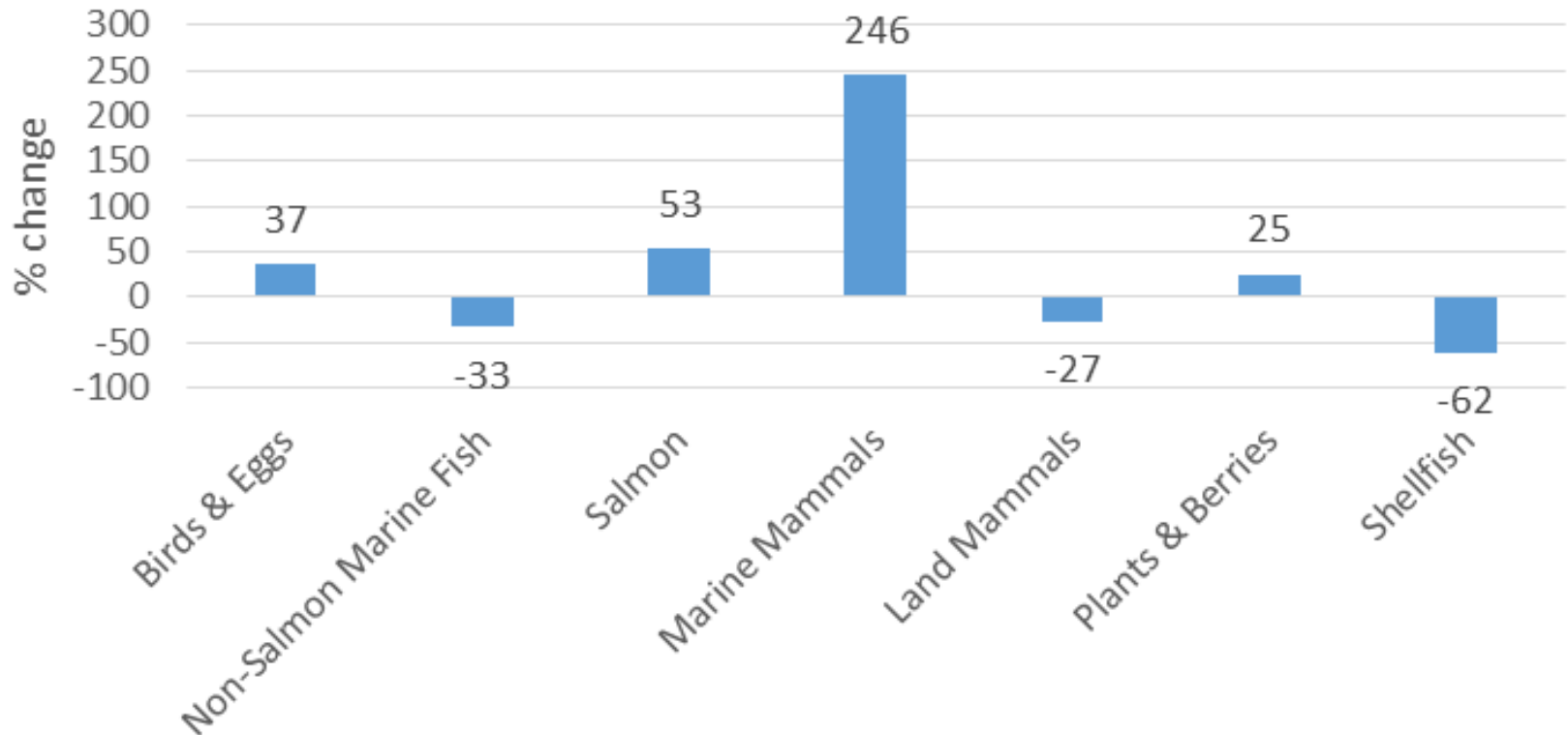
Unalaska's harvests for 45 households in pounds usable weight by species category.



Per capita harvests between two studies and between two decades. ADFG Subsistence Division for 1994 and Reedy (USFWS grant) for 2013.

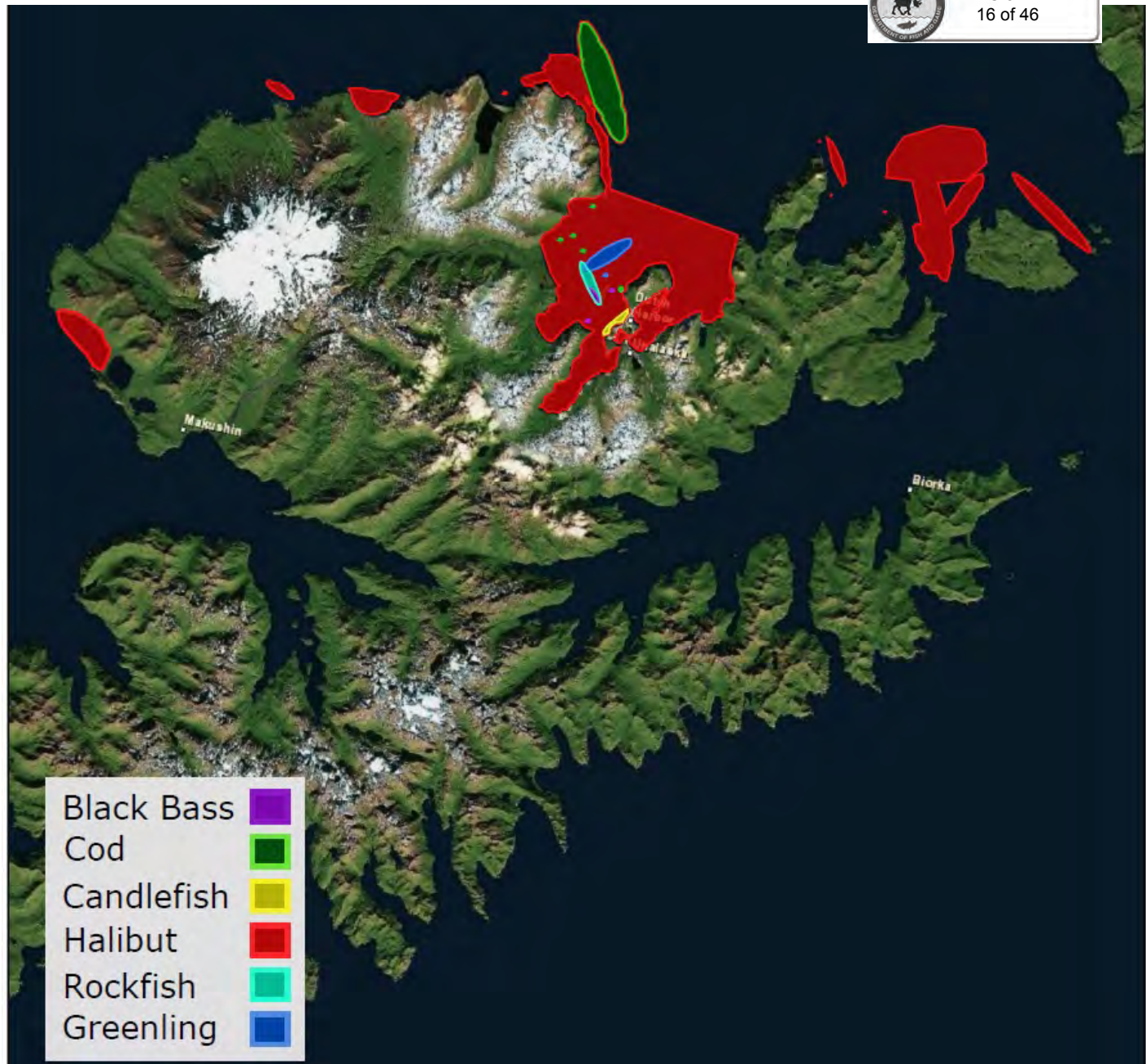


Percent Change in Per Capita Harvests by Species category between 1994 and 2013



Percent change in per capita harvests by species category between two studies and two decades.

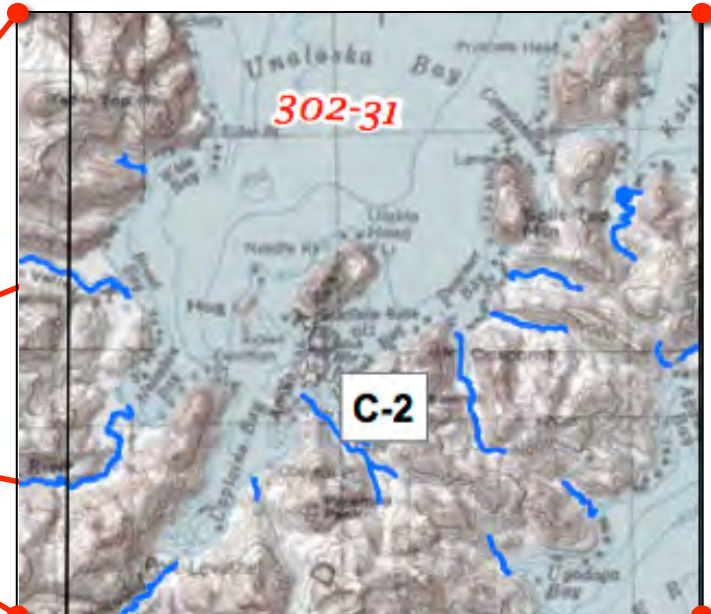
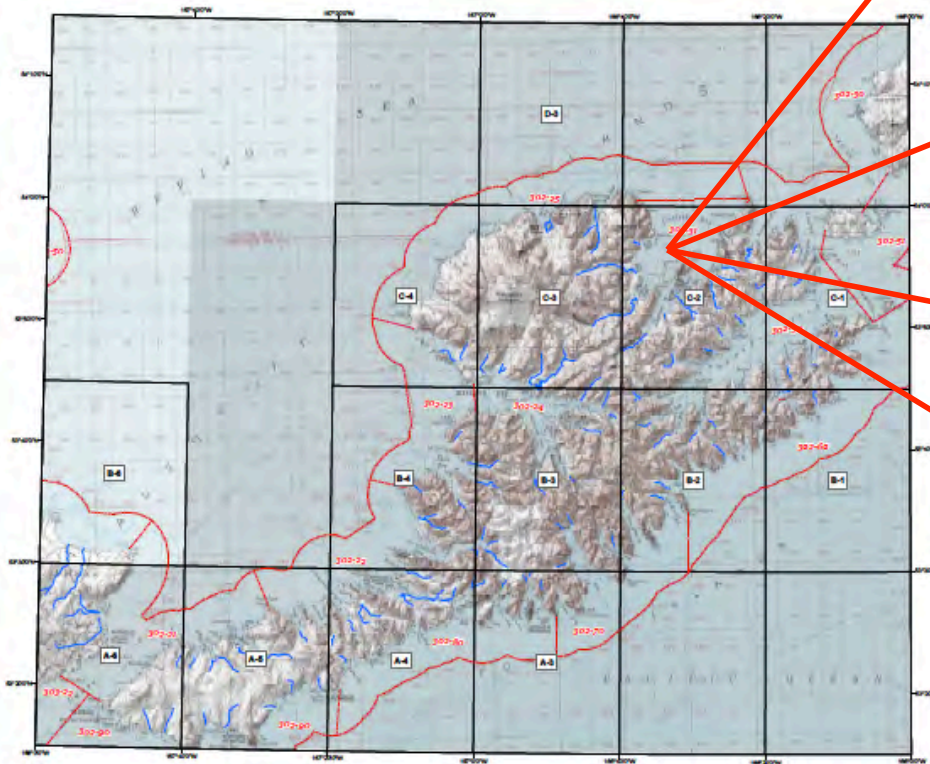
Locations of Subsistence Marine Fish Harvests, 2013



Proposal 194

5 AAC 28.650.

Anadromous Waters Atlas Unalaska Index



Source: ADF&G

“Sockeye and Coho salmon runs returning to Unalaska Bay streams are relatively small and fully exploited by local fisheries.”

–Unalaska Fish & Game



Proposal 194

5 AAC 28.650.

- Harvest of Walleye Pollock in Unalaska Bay over the past 10 years has ranged from 0.9 to 7.3 million pounds taken by an average of 8 vessels
- Based on fish ticket records the following estimated bycatch of the past 5 years:
 - 55,822lbs of Pacific Cod
 - 2,165lbs Atka Mackerel
 - 1,379lbs of Pacific Herring
 - 1,484lbs of Pacific Halibut
 - 2,343lbs of Pacific Salmon

– Source: 2015 Unalaska Fish & Game



Proposal 194

5 AAC 28.650.

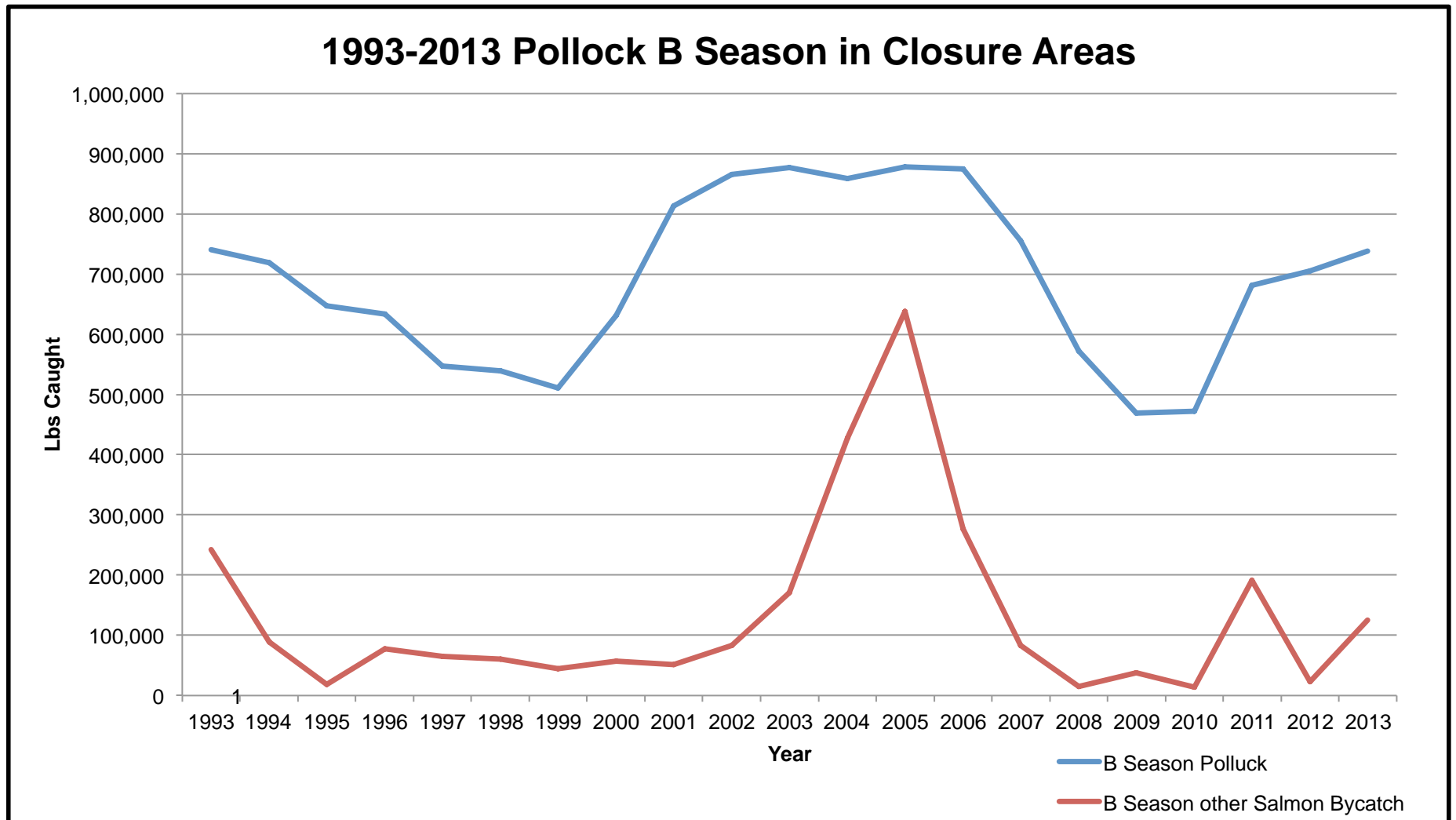


Figure 1. Catch and bycatch of pollock and “other” salmon in the directed pollock fishery B season
Source: 2013 Salmon ICA Report



Proposal 194

5 AAC 28.650.

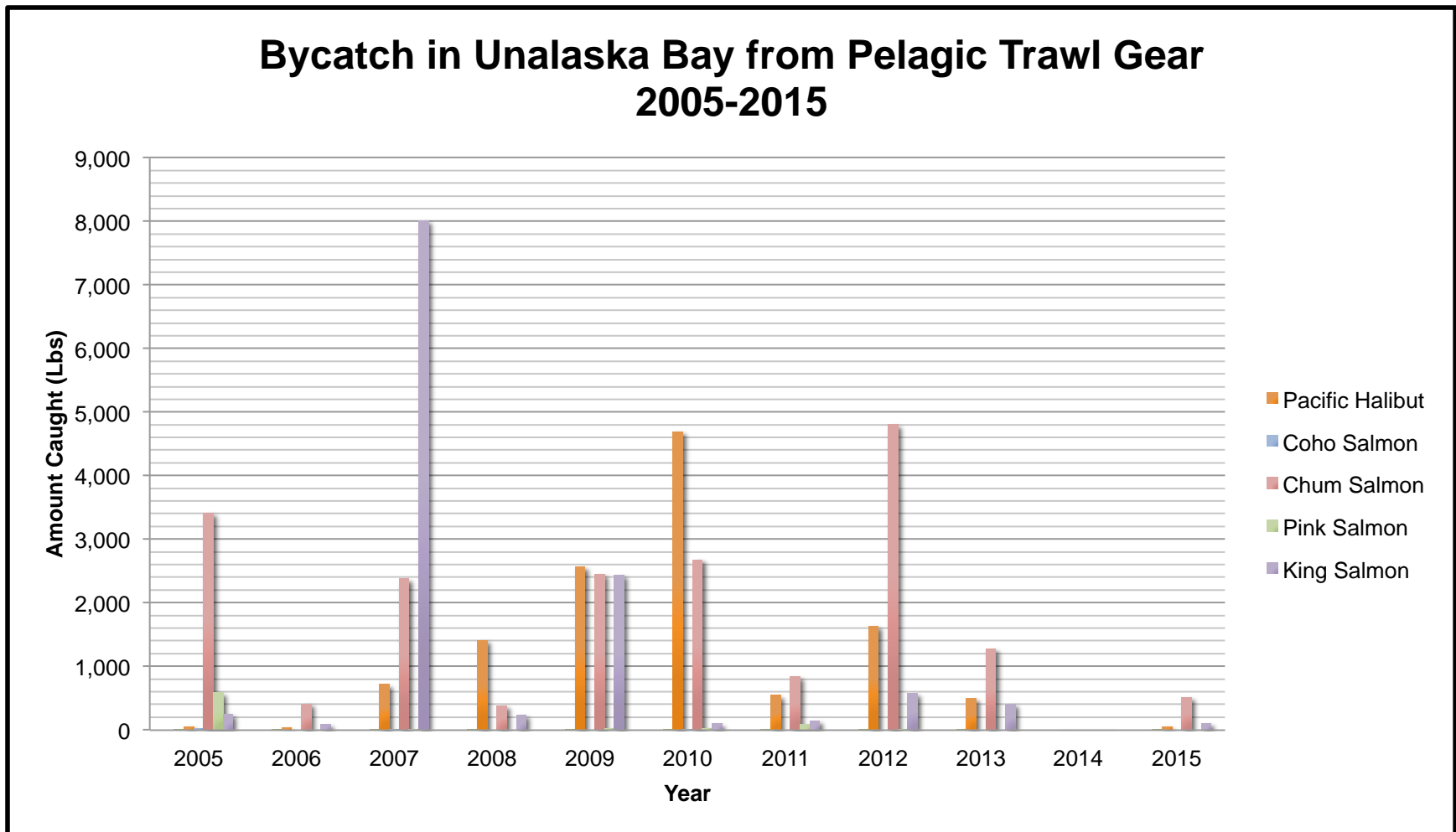


Figure 2. Source: department fish ticket database, department statistical area 665335
*2015 data are preliminary



Proposal 194

5 AAC 28.650.

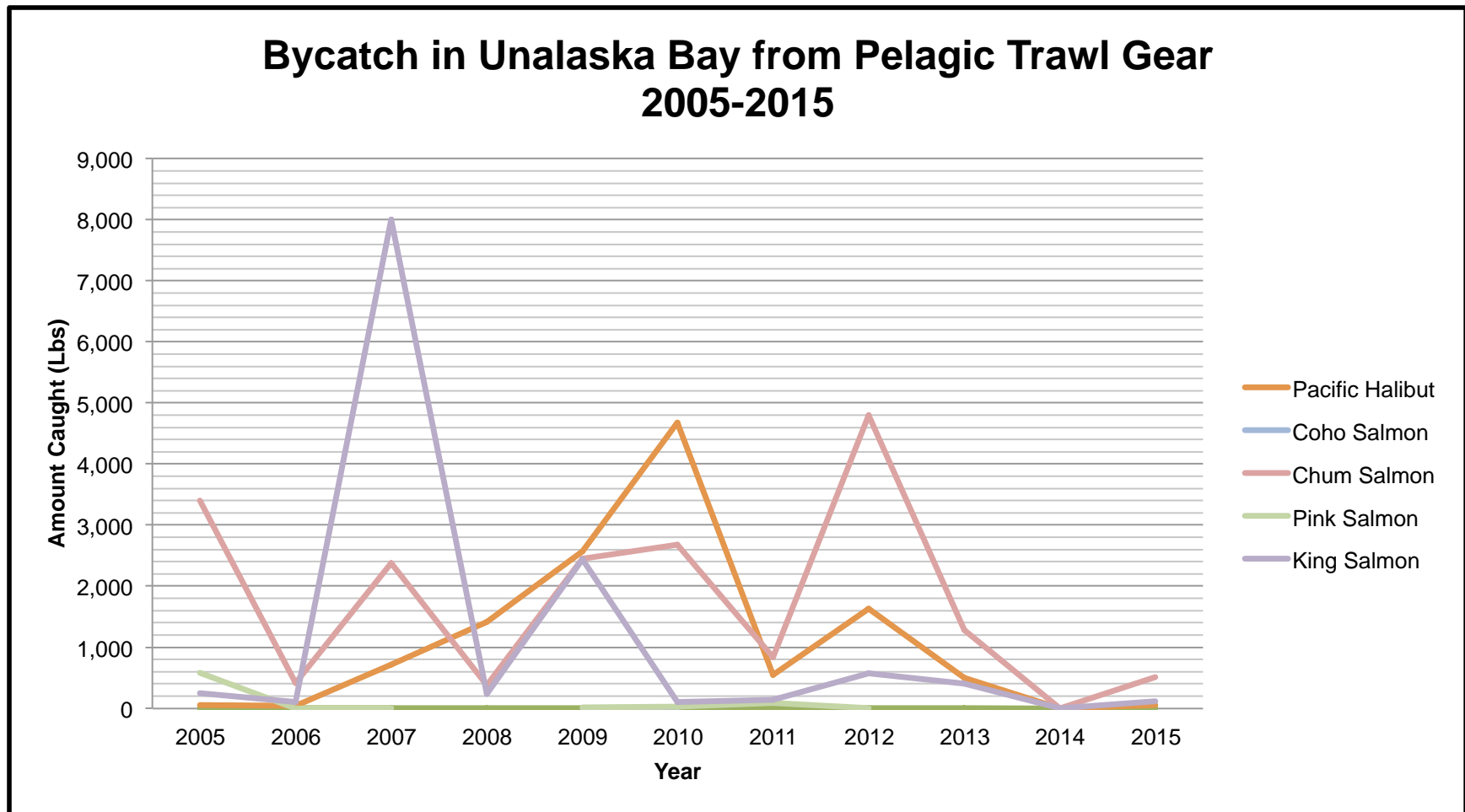


Figure 3. Source: department fish ticket database, department statistical area 665335
*2015 data are preliminary



Proposal 194

5 AAC 28.650.

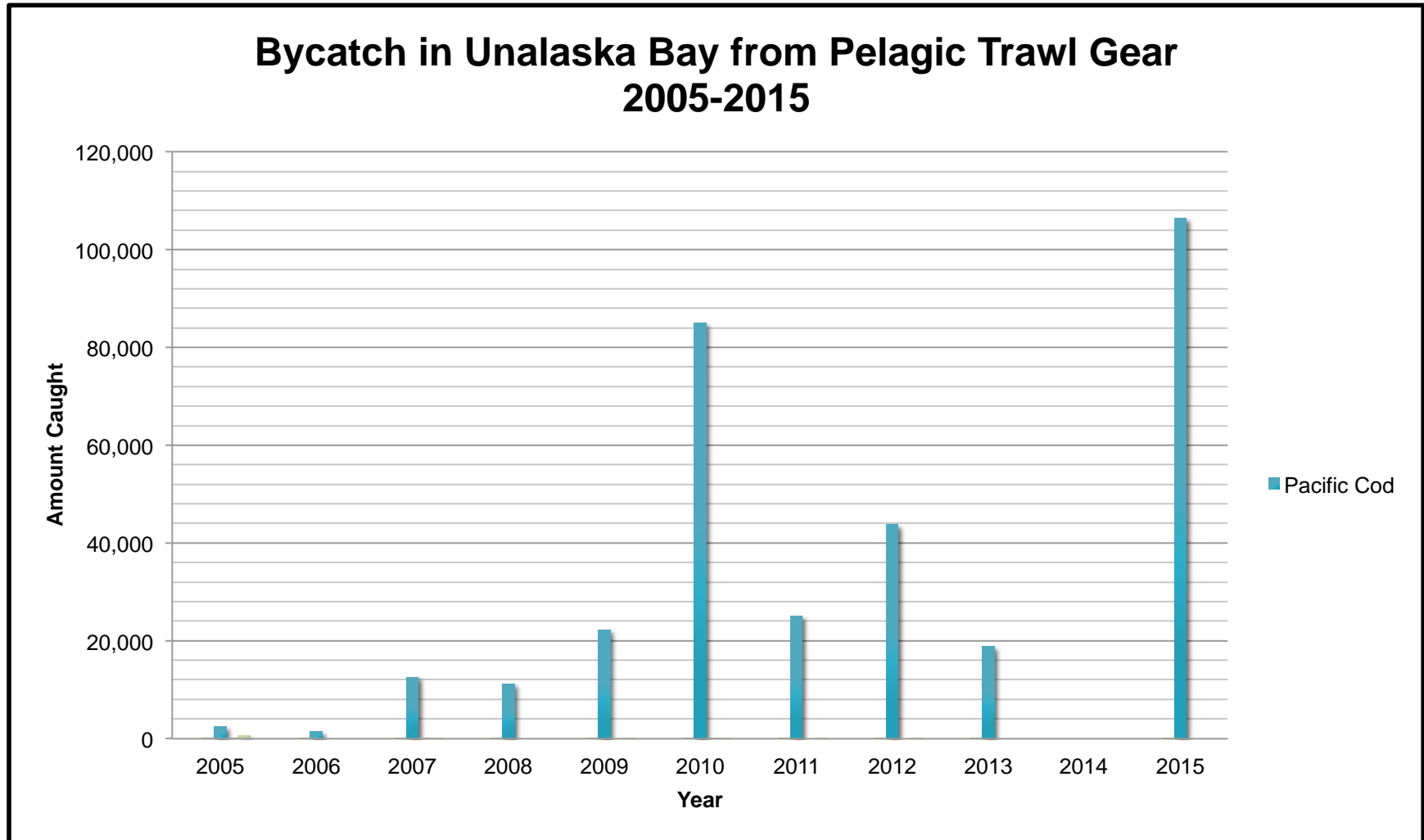


Figure 4. Source: department fish ticket database, department statistical area 665335
*2015 data are preliminary, no data for 2014.



Proposal 194

5 AAC 28.650.

- “This proposal will allow fish and game to **recover** and **return** to areas closer to our community enabling us to be able to continue harvest and process our **local resources**. We considered limiting all commercial fishing vessels under 35 feet lengths, but so few of them bother fishing inside the bay and their impacts are not nearly that of the trawl vessels. Trawlers are large vessels that are built to handle the stormy weather of the Bering Sea. They did not historically fish in Unalaska Bay and restricting them from these waters would alleviate many problems.”
– UNFA Proposal 194



UNALASKA/DUTCH HARBOR
FISH AND GAME ADVISORY COMMITTEE
PO BOX 162 UNALASKA, AK 99685

May 9, 2008

Denby Lloyd, Commissioner,
Alaska Department of Fish and Game
PO Box 115526
Juneau, Alaska 99811

Subject: B-Season Pollock trawl closer in Unalaska Bay; this is a portion of the Bering Sea Pollock Restriction Area.

Dear Mr. Lloyd:

As Chairman of the local the Unalaska/ Dutch Harbor Fish and Game Advisory Committee, the Unalaska Fish and Game Advisory board has instructed me to write letters to you; Mr. Robert Mecum, NOAA Acting Administrator, Alaska Region; Mr. Eric Olson, Chairman of the North Pacific Fishery Management Council, and Mr. Mel Morris, Chairman State of Alaska Board of Fisheries. The Advisory committee would like to have a trawl closer considered in the Unalaska Bay area from a point at (54°00.314'N, lat 166°37.674 W long.) to Priest Rock (54°00.487 N. lat.166°22.900W.long). This area is a part of the Bering Sea Pollock Restriction Area and is only open to Pollock trawling by catcher vessels during the Pollock B season from June 10th to November 1st of each year; we would propose that this area in Unalaska Bay be closed permanently to trawling.

Trawling inside of Unalaska Bay has been an issue for local residents in this community for many years. I would like to point out that this area has not been an area that the Pollock trawl fleet has used traditionally or depended on. In the last few years, as Pollock stocks have moved further to the North, and Pollock catches have declined in areas near Unalaska and Akutan Islands, we have seen trawlers come into Unalaska Bay to top off a load, or to see if they might get lucky and get a tank of fish. The concern for the local residents is that the influx of large trawlers into this very small area during the summer time will impact local residents who are engaged in commercial, subsistence, and personal-use fishing activities in the Unalaska Bay area. The concerns we have heard are of salmon bycatch by these trawl vessels that are trawling adjacent to some of the bay's most productive river systems, just as the returns of Reds, Pinks and Silvers Salmon are coming into the Unalaska Bay area. This area isn't very large, and there really isn't a lot of room for many different fishery activities to take place at the same time. Furthermore, almost all commercial fishing in Unalaska Bay area is being done by vessels in the 58-foot and under class.



We feel that a closer of this size in the Unalaska Bay area shouldn't be major inconvenience to the Pollock fleet; just a few catcher vessels during the B season come into this area. I should also point out that most of the Pollock catcher vessels that deliver to Unalaska processing plants have already heard about the local concern regarding trawling in Unalaska Bay and have quit working the area a few years ago.

We have enclosed map of the area for your review, and we thank you for the consideration of this request, and if you need further information or have questions my contact numbers are listed below.

Sincerely

A handwritten signature in black ink, appearing to read "Frank Kelty".

Frank Kelty
Chairman
Unalaska/Dutch Harbor Fish and Game Advisory Committee

CC: Robert Mecum, NOAA Acting Administrator, Alaska Region
Mel Morris, Chairman State of Alaska, Board of Fisheries
Eric Olson, Chairman North Pacific Fishery Management Council

Contact Numbers for Frank Kelty
Unalaska/Dutch Harbor Fish and Game Advisory Committee
PO Box 162
Unalaska, AK 99685
E-Mail fkelly@ci.unalaska.ak.us
Phone 907-581-7726



MEMORANDUM TO COUNCIL

TO: MAYOR AND CITY COUNCIL MEMBERS
THRU: CHRIS HLADICK, CITY MANAGER
FROM: FRANK KELTY, RESOURCE ANALYST
DATE: JANUARY 7, 2010
RE: SUPPORTING THE ADOPTION OF RESOLUTION 2010-02 IN SUPPORT OF BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH TRAWLING GEAR YEAR ROUND

SUMMARY: The Unalaska/ Dutch Harbor Fish and Game advisory committee has submitted Proposal Number 111 to the Alaska Board of Fisheries the advisory committee supported and adopted this year round trawl closure unanimously. This proposal would close Unalaska Bay to groundfish trawling with trawl gear year round from a point at (54° 00.314' N lat., 166° 37.674' W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50' W long.)

PREVIOUS COUNCIL ACTION: The Unalaska City Council discussed this issue in the fall of 2008 and Mayor Marquardt wrote a letter of support for this proposal to the Board of Fisheries when the Unalaska /Dutch Harbor Fish and Game Advisory committee submitted the proposal in the spring of 2009.

BACKGROUND: The City of Unalaska supports the need to address issues of interest to the local residents, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years. This area is not traditionally used or depended on by the Pollock trawl fleet and is only open to trawling during the Pollock B season June 10th to November 1st annually. Trawling adjacent to some of Unalaska Island's most productive, sensitive and largest river systems is a major concern to local residents that fish this area. The concern for the local residents is that the influx of trawlers into this very small and important area during the summer has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area.

DISCUSSION: Local residents have long voiced concerns regarding bycatch of salmon and halibut, gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year. Proposal 111 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay. This closure may also have a positive impact on habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area. It should also be noted that the majority if not all of the vessels trawling this area do not deliver to local processing plants, the local Pollock vessels are well aware of the sensitivity of the local residents to trawling in the Unalaska Bay area and have chosen to stay out of this area at some cost to their fishing operations. The adoption of Resolution 2010-02 will show the Board of Fisheries that City Unalaska supports actions that will have a positive impact on this very important area to local residents.

ALTERNATIVES

A. Unalaska City Council may choose to adopt Resolution 2010-02.



- B. Unalaska City Council may choose to oppose Resolution 2010-02
- C. Unalaska City Council may choose not to comment on this issue

FINANCIAL IMPLICATIONS I don't see any financial impacts to Unalaska fishery revenues, as I stated earlier, the vessels fishing Pollock in Unalaska Bay do not deliver their catch to the Unalaska shoreplants. They sell their catch to processing operations in Akutan and Beaver Inlet and will continue to do so, even if Unalaska Bay is closed to Pollock trawling during the B season.

LEGAL N/A

STAFF RECOMMENDATION Staff recommends that the City Council adopt Resolution 2010-02

PROPOSED MOTION The Unalaska City Council moves to adopt Resolution 2010-02 in support of State of Alaska Board of Fisheries Proposal 111

CITY MANAGER'S COMMENTS:



CITY OF UNALASKA
UNALASKA, ALASKA

RESOLUTION NO. 2010-02

A RESOLUTION OF THE UNALASKA CITY COUNCIL SUPPORTING THE ADOPTION BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR YEAR ROUND.

WHEREAS, the Unalaska/ Dutch Harbor Fish and Game advisory committee has submitted Proposal Number 111 to the Alaska Board of Fisheries, the advisory committee supported this proposal unanimously; and

WHEREAS, this proposal would close year round Unalaska Bay to groundfish trawling with trawl gear year round from a point at (54° 00.314' N lat., 166° 37.674 W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22 50 W long.) ; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the Pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area ; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river systems is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year ; and

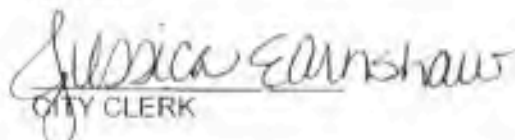
WHEREAS, proposal 111 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area

NOW THEREFORE BE IT RESOLVED THAT, the Unalaska City Council strongly urges the Alaska Board of Fisheries to adopt Proposal 111 for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area

PASSED AND ADOPTED BY A DULY CONSTITUTED QUORUM OF THE UNALASKA CITY COUNCIL THIS 12th DAY OF January 2010.


MAYOR

ATTEST


CITY CLERK

**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM
PO BOX 115526, JUNEAU, ALASKA 99811-5526**



BOARD OF FISHERIES REGULATIONS

- Fishing Area - Bering Sea/Aleutian Islands
 Subsistence Personal Use
 Sport Commercial

JOINT BOARD REGULATIONS

- Advisory Committee Regional Council Rural

BOARD OF GAME REGULATIONS

Game Management Unit (GMU) _____

- Hunting Trapping
 Subsistence Other _____
 Resident
 Nonresident

Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.

1. Alaska Administrative Code Number: 5 AAC 28.650 closed waters in the Bering Sea - Aleutian Islands area. Regulation Book Page No. 419

2. What is the problem you would like the Board to address?

The Unalaska/Dutch Harbor Advisory Committee would like to see waters of Unalaska Bay closed to commercial fishing for groundfish with trawl gear from a point at (54° 00.314' N lat., 166° 37.674' W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50' W long.) (See attached map). This area is a part of the Bering Sea Pollock Restriction Area and is only open to pollock pelagic trawling by catcher vessels during the pollock B season from June 10 to November 1 of each year. We propose that this area in Unalaska Bay be closed year round to commercial fishing for groundfish with pelagic trawl gear. Trawling inside of Unalaska Bay has been an issue for local residents in this community for many years. Unalaska Bay has not been an area that the pollock trawl fleet has traditionally used or depended on. But in the last few years, as pollock stocks have moved further to the north, during the B season, we have seen trawlers come into Unalaska Bay either to top off a load, or to see if they might get lucky and get a truck of fish out of Unalaska Bay.

The concern for the local residents is that the influx of large trawlers into this very small area during the summer time has impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area. The concerns we have heard are of salmon and halibut bycatch by trawl vessels that are trawling adjacent to some of the most productive and largest river systems in the Aleutian Islands, just as the returns of red, pink and silver salmon are coming into the Unalaska Bay area. We have also heard of concerns by residents of gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year. Unalaska Bay is currently closed year round to non pelagic trawling (5 AAC 39.164)

3. What will happen if this problem is not solved?

Unalaska Bay will continue to see an influx of large trawlers into this very small area between June 10 and November 1 that will continue to impact local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay. These vessels are trawling adjacent to some of Unalaska Island's most productive and largest river systems. Local residents that fish in this area will continue to have concerns of bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

5 AAC 28.650 (b). All waters of Unalaska Bay from a point at (54° 00.314' N lat., 166° 37.674' W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50' W long.) are closed to commercial fishing for groundfish with trawl gear.

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

This proposal may reduce habitat impacts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and may have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted?

Unalaska residents and others that are engaged in subsistence, sport and non-Pollock commercial fishing activities in Unalaska Bay area.



6. Who is likely to suffer if your solution is adopted?

Pollock catcher vessels that fish Unalaska Bay during the Pollock B season.

7. List any other solutions you considered and why you rejected them.

None.

DO NOT WRITE HERE

**Submitted By:
Name / Signature**

Frank Kelly,

Chairman Unalaska /Dutch Harbor ADF&G Advisory Committee

Individual or Group

P. O. Box 162

Unalaska, Alaska

99685

Address

City, State

ZIP Code

907-581-1424

907-581-7726

fkelly@ci.unalaska.ak.us

Home Phone

Work Phone

Email



GENERAL PROVISIONS

STATE Regs

series

(d) When sufficient reliable data has been collected to determine times and locations where non-pelagic trawl gear can be operated without significant detrimental impact on prohibited species, the limitations in this section and 5 AAC 39.164 will be appropriately modified.

5 AAC 39.164. NON-PELAGIC TRAWL GEAR RESTRICTIONS. (a) Non-pelagic trawl gear may be operated in all waters of Tanner crab Registration Area J (5 AAC 35.500) only if, as may be required under 5 AAC 39.163(c), an onboard observer is present on the vessel when gear is being operated, only under the conditions of a permit issued by the commissioner, and only in locations and during periods not otherwise closed to non-pelagic trawling under (b) or (c) of this section. The permit

- (1) must specify the locations and times when non-pelagic trawl gear may be operated;
- (2) may restrict the amount of fish and shellfish that may be harvested within a specified location; and
- (3) must be obtained in person at a department office located within the statistical area.

(b) Non-pelagic trawl gear may not be operated in waters of Alaska as follows:

(1) in the following waters of king crab Registration Area K (5 AAC 34.400) from January 1 through December 31

(A) Chirikof Island closure, all waters within three miles of Chirikof Island;

(B) Alitak, Towers, and Geese Islands closure, all waters of Alitak Bay, Olga Bay, Alitak Flats, and Sitkinak Island enclosed by a line from Low Cape (57° N. Lat., 154° 31' W. long.), to 57° N. lat., 154° 37.50' W. long., then a line following the three mile contour around Tugidak Island to 56° 28.50' N. lat., 153° 52' W. long., then a straight line to Cape Sitkinak (56° 33.50' N. lat., 153° 52' W. long.), to 56° 37' N. lat., 153° 48.50' W. long., then a line following the three mile contour to 56° 49' N. lat., 153° 38' W. long., then a straight line to the easternmost point of Twoheaded Island (56° 54.50' N. lat., 153° 33' W. long.), to a point on Kodiak Island at 56° 56' N. lat., 153° 36' W. long.;

(C) Barnabas closure, all waters of Sitkalidak Strait, Kiliuda Bay, and Ugak Bay east of 153° 16' W. long., in Sitkalidak Passage and enclosed by a line from Black Point (56° 59.50' N. lat., 153° 18.50' W. long.) to 56° 57.50' N. lat., 153° 13.50' W. long., then a line along the three mile contour to 57° 20' N. lat., 152° 23' W. long., then a straight line to the southernmost tip of Ugak Island (57° 22' N. lat., 152° 18.50' W. long.), and west of a line from the northernmost tip of Ugak Island (57° 23.50' N. lat., 152° 17.50' W. long.) to Narrow Cape (57° 26' N. lat., 152° 19' W. long.).

(D) Chiniak Bay closure, all waters of Chiniak Bay and Monushka Bay enclosed by a line from Cape Chiniak (57° 37' N. lat., 152° 09' W. long.) to 57° 37' N. lat., 152° 02' W. long., then a line along the three mile contour to 57° 58' N. lat., 152° 17' W. long., then a straight line to East Cape on Spruce Island (57° 55' N. lat., 152° 19.50' W. long.) and east of 152° 30' W. long. in Ouzinkie Narrows;

(E) Marmot Island closure, all waters enclosed by a line from Pillar Cape on Afognak Island (58° 09' N. lat., 152° 06.50' W. long.), to Marmot Cape on Marmot Island (58° 10' N. lat., 151° 52' W. long.) and from Cape St. Hermogenes (58° 15' N. lat., 151° 47.50'

W. long.) to 58° 08' N. lat., 151° 47.50' W. long., then a line to 05' N. lat., 152° 09.50' W. long., to Pillar Cape (58° 09'

(F) West Side closure, all waters of Uyak Bay, Strait, Raspberry Strait, Malina Bay, Paramonof Bay, line from Cape Uyak (57° 38.33' N. lat., 154° 20.33' W. lat., 153° 50.67' W. long.) to Raspberry Cape (58° 03.5 Cape (58° 24.50' N. lat., 152° 53' W. long.) to Party C lat., 152° 34' W. long.), west of 152° 30' W. long. in S long. in Whale Pass and Afognak Strait;

(G) Northeast Afognak closure, all waters Strait and enclosed by a line from Point Banks on Shuy long.) to 58° 42' N. lat., 152° 19' W. long., then a line to 08' N. lat., 151° 47.50' W. long., then a straight line to Island (58° 15' N. lat., 151° 47.50' W. long.) and north lat., 152° 07' W. long.) to Marmot Cape (58° 10' N. lat

(H) Marmot Bay closure, all waters east of Afognak Strait, west of a line across Ouzinkie Narrows a line from Pillar Cape on Afognak Island (58° 09' N. la lat., 152° 09.50' W. long., then a line following the three 17' W. long., then a straight line to East Cape on Spruce W. long.), including waters of Marmot, Kizhuyak, Ka

(I) Cape Chiniak closure, all waters enclosed N. lat., 152° 09' W. long.) to 57° 37' N. lat., 152° 02' W. mile contour to 57° 20' N. lat., 152° 23' W. long., then a of Ugak Island (57° 22' N. lat., 152° 18.50' W. long.) and tip of Ugak Island (57° 23.50' N. lat., 152° 17.50' W. lo 152° 19' W. long.);

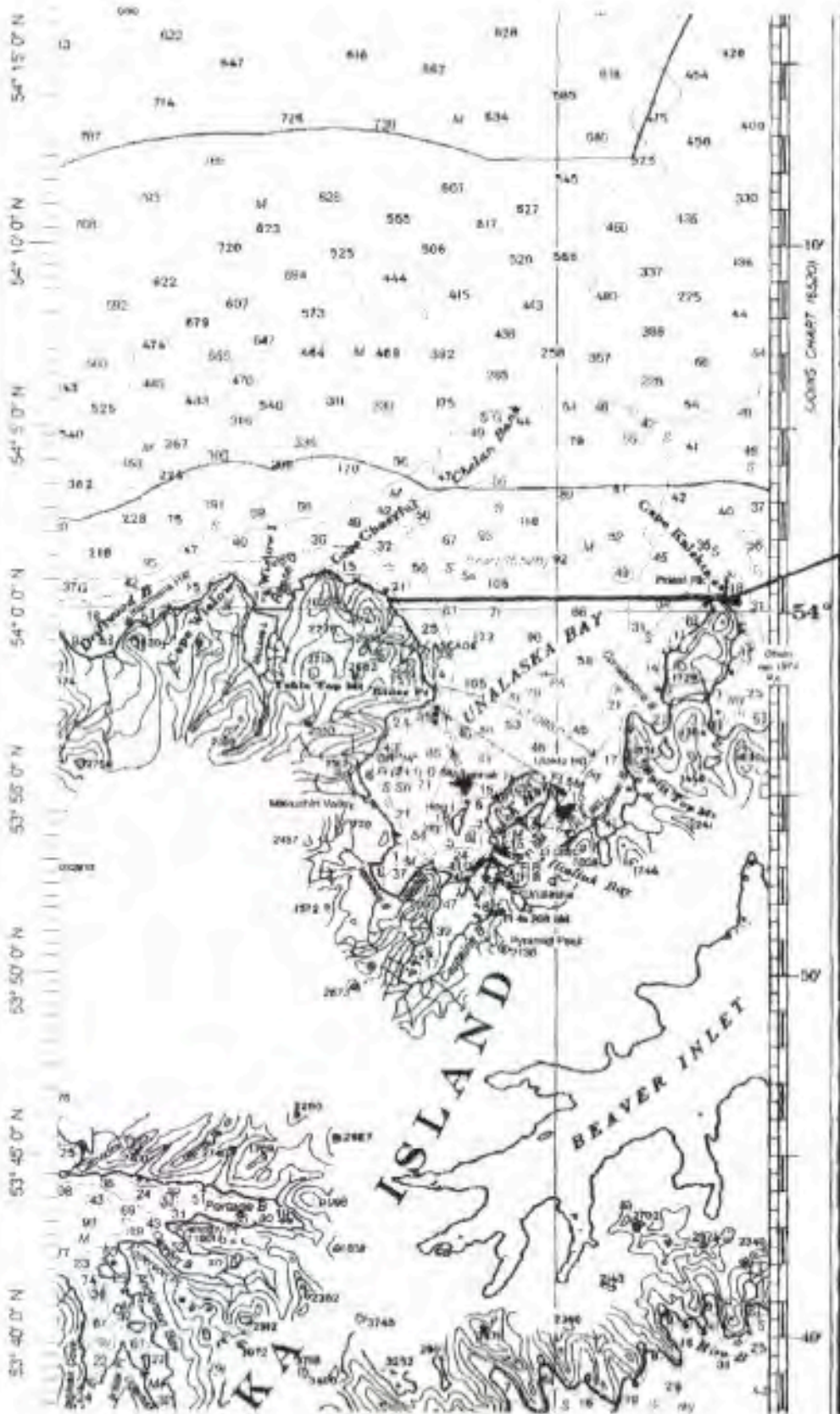
(J) South Sitkalidak Strait closure, all waters (56° 59.50' N. lat., 153° 18.50' W. long.) to 56° 57.50' N. following the three mile contour to 56° 50' N. lat., 153° easternmost tip of Twoheaded Island (56° 54.50' N. la Kodiak Island at 56° 56' N. lat., 153° 36' W. long., and Sitkalidak Passage;

(K) Cape Ikolik closure, all waters enclosed 17.40' N. lat., 154° 55.60' W. long. then a line following 154° 37.40' W. long., then a straight line to Low Cape

(L) West Shuyak Island closure, all waters enc Shuyak Island (58° 38' N. lat., 152° 19' W. long., to 58° a line following the three mile contour southwest to 58° to Shuyak Island;

(M) Alaska Mainland closure, all state waters the latitude of Cape Douglas (58° 51' 10' N. lat.) and ea (156° 19' W. long.);

(N) East Sitkinak closure, all waters enclosed



all pass
south of the
line.

Chart Name: UNALASKA I TO AMUKTA I
 Chart ID: 16500 1
 Top Left: 54° 16' 22" N 166° 52' 52" W
 Bottom Right: 53° 37' 52" N 165° 58' 10" W



CITY OF UNALASKA
UNALASKA, ALASKA
REGULAR MEETING
JANUARY 12, 2010

The regular meeting of the Unalaska City Council was called to order by Mayor Shirley Marquardt at 7:00 p.m., January 12, 2010, in the Unalaska City Hall Council Chambers. Roll call was taken and the following members were present:

Mayor - Shirley Marquardt
Members - Katherine McGlashan
- Dick Peck
- Dennis Robinson
- Zac Schasteen
- David Gregory
- Roger Rowland
Absent - None

PLEDGE OF ALLEGIANCE: Mayor Marquardt led the Pledge of Allegiance.

RECOGNITION OF VISITORS: None.

APPROVAL OF AGENDA: Hearing no revisions, Mayor Marquardt approved the agenda.

MINUTES: Hearing no revisions, Mayor Marquardt declared the minutes of December 22, 2009 regular meeting adopted.

FINANCIAL REPORT: None.

BOARD/COMMISSION REPORTS: None.

AWARDS/PRESENTATIONS: None.

MANAGER'S REPORT: City Manager's report included in packet.

COMMUNITY INPUT/ANNOUNCEMENTS:

1. Thank you to everyone that worked on the fireworks show, very good show.
2. Martin Luther King Jr. Community Celebration Monday, January 18, 2010 at 7:00 p.m. at the community center.
3. Council Member Schasteen would like to encourage community members to donate money to Anchorage Police Officer, Jason Allen support fund at Key Bank.
4. National Ocean Sciences Bowl competition against council members will be on Wednesday, January 13, 2009 at the City Hall Council Chambers.
5. World War II Center will be showing Ending Jim Crow Days in Alaska, Sunday at 8 p.m.

PUBLIC TESTIMONY ON AGENDA ITEMS:

Public Testimony on resolution 2010-01 taxicab rates would like the resolution to clarify the charter rate to be exclusive.

PUBLIC HEARING: None.

WORK SESSION: Rowland move to adjourn to work session at 7:08 p.m., Schasteen second. Unanimous vote. Meeting reconvened to regular session at 8:30 p.m. Items discussed in the work session:

1. **QUARTERLY FISHERIES UPDATE**
2. **FY11 BUDGET - REVENUE PROJECTIONS**
3. **FY11 COUNCIL BUDGET GOALS**

CONSENT AGENDA

1. **RESOLUTION NO. 2010-01:** ESTABLISHING TAXICAB RATES FOR THE CALENDAR YEAR 2010 AS REQUIRED BY UNALASKA CITY CODE.

Hearing no objections, Mayor Marquardt declared the Consent Agenda adopted.

UNFINISHED BUSINESS: None.

NEW BUSINESS:

1. **RESOLUTION NO. 2010-02:** SUPPORTING THE ADOPTION BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR YEAR ROUND.

McGlashan move to adopt Resolution No. 2010-02, Gregory second.



Public Testimony: Support this resolution, have commercial fished for 20 years; currently sit on UNFA board, this has been a topic for us. Appreciate the work Alaska Department of Fishing Game has done, thank you for your support on this issue.

Public Testimony: Oppose this resolution; Westward Seafoods buys Pollock from boats that catch part of their quota from the bay. We rely on that revenue which also supports the City. Believe it's an extraordinary measure to close the bay.

Public Testimony: Currently serve on Fish and Game Advisory Committee; support this resolution; believe this is good for the resource.

Discussion: Council discussion supports this resolution; closing this bay has a direct affect on subsistence fishing.

Council discussion supports this resolution; this will help local subsistence fishing.

Council discussions support this resolution; minimum we can do before the resource is gone.

Council discussion believes we should adopt this resolution: It's difficult to keep taking away from industry; this has a direct benefit if we close the bay.

VOTE: Unanimous

COUNCIL DIRECTIVES:

Rowland move to direct the City Manager to research a sliding rate tax on diesel fuel that diminishes the rate as price per gallon goes up or caps the dollar per gallon figure that the current 3% applies to and bring back a recommendation, Schasteen second.

Discussion: Council discussions feel we should lessen the tax on high fuel costs, to save fisherman money.

Council discussion would like to have City Manager bring back several options on this directive.

Council discussion would like to find an option to help the fisherman out; do not believe this is the way to help them.

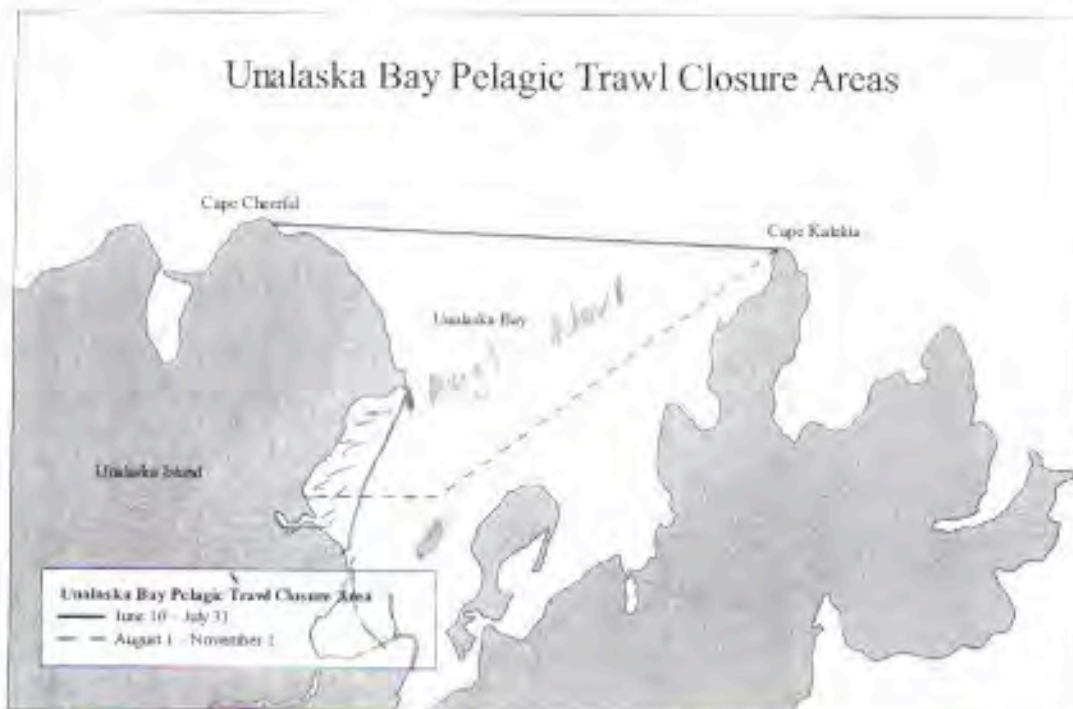
VOTE: AYES-4, NAYS-2. Motion passes 4-2.

COMMUNITY INPUT/ANNOUNCEMENTS: None

Mayor Marquardt adjourned the meeting at 12:06 pm


Jessica Earnshaw
Acting City Clerk

APPROVED
1/12/2010



5 AAC 28.650 (b) The waters of Unalaska Bay are closed to groundfish fishing with pelagic trawl gear, as follows:

(1) from June 10 through July 31, south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. to Cape Cheerful at 54° 01' N. lat., 166° 40' W. long.;

(2) beginning August 1 until the closure of the parallel Bering Sea walleye pollock 'B' season, south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. to a point near Hog Island at 53° 55.42' N. lat., 166° 34.25' W. long. to a point in Broad Bay at 53° 55.42' N. lat., 166° 38.80' W. long.; for the purposes of this paragraph, "parallel Bering Sea Walleye Pollock 'B' season" means the parallel season conducted from June 10 through November 1.



February 12, 2013

ADF&G, Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Proposal 162 – Unalaska Bay Closure

To Whom it May Concern;

I support Proposal 162 to the Board of Fisheries, to close Unalaska Bay to trawl fishing

I'm a lifelong resident of Unalaska for over 50 years and have commercial fished and subsistence fished and hunted here during this time as my family has done for many generations.

We've witnessed a huge decline in fish, seals, ducks in Unalaska Bay where my many relatives and neighbors gather our food for our tables. It is a very important part of our life that we need to protect. At the same time we see these big trawlers towing around us in our traditional areas we hunt and fish and then seeing the fishes washed up on the beaches.

We are having to go outside the bay in our small skiffs to find fish and game nowadays which is dangerous and burns up a lot of fuel too. A lot of times we can't even set our groundlines and other gear because we have lost it in the past few years since the trawlers have been coming up inside the bay and we don't want to risk getting run over by them.

We need to protect our rights to be able to continue to fish and hunt and hope you can support this proposal also.

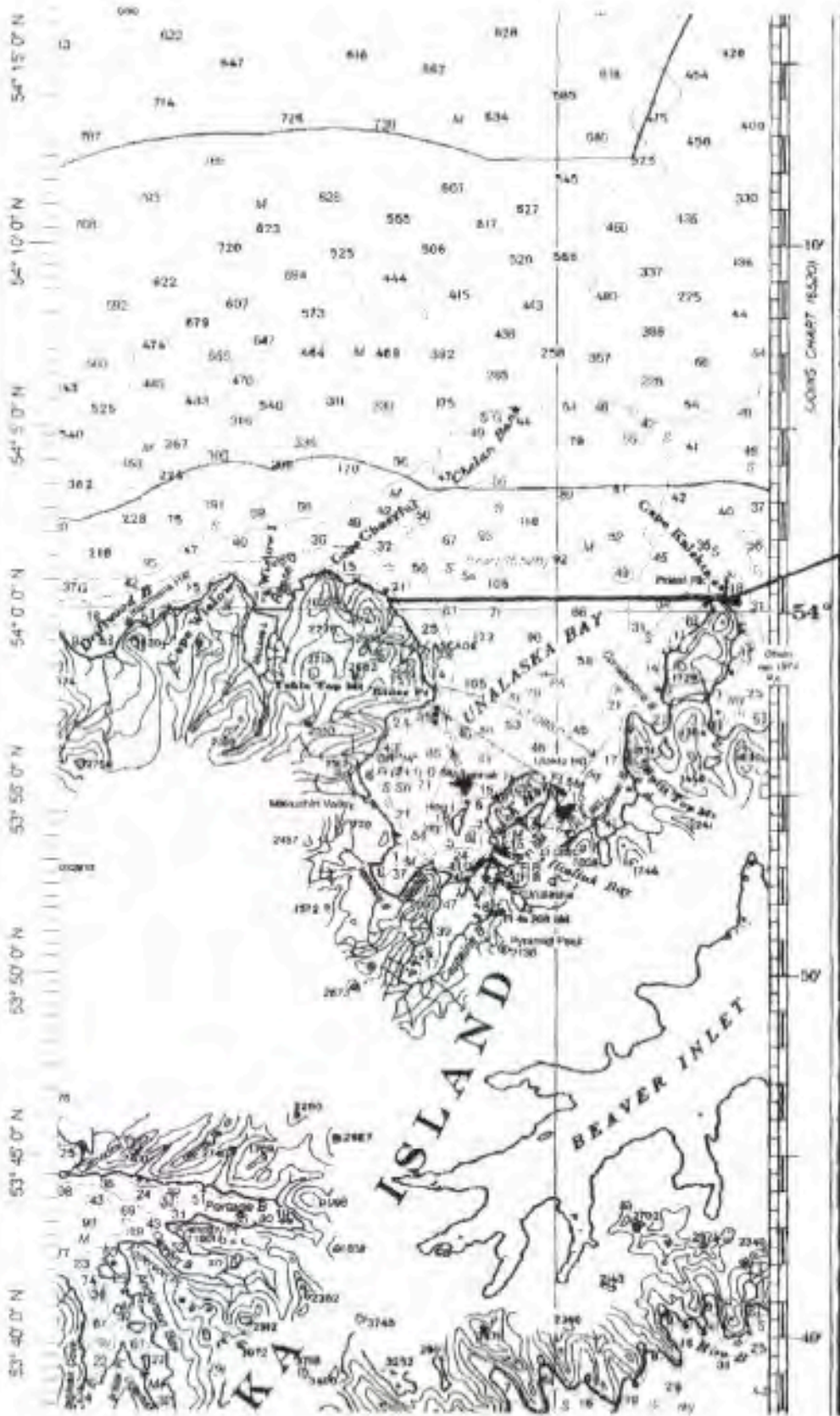
Thank You,

A handwritten signature in cursive script that reads "Boris Galaktionoff".

Boris Galaktionoff

PO Box 1414

Unalaska, AK 99685



~~_____~~
~~_____~~
all pass
south of the
line.

Chart Name: UNALASKA I TO AMUKTA I
Chart ID: 16500 1
Top Left: 54° 16' 22" N 166° 52' 52" W
Bottom Right: 53° 37' 52" N 165° 58' 10" W



February 16, 2013

To Whom It May Concern;

I support Proposal 162 to the Board of Fisheries, to close Unalaska Bay to trawl fishing.

I'm a lifelong resident of Unalaska for over 32 years and have sport fished, subsistence fished and hunted here during this time as my family has done for many generations. It was passed down to me and I am excited at the chance to someday pass it onto my children.

I've witnessed a tremendous decline in fish and game in Unalaska Bay where we gather fish and game for subsistence and our livelihoods. It is a very important part of our life that we need to protect. At the same time we see these big trawlers towing around us in our traditional areas we hunt and fish and then seeing the dead fish floating and washed up on the beaches. It's very discouraging to say the least when I am out on my boat fishing and hunting for the next season's supply and see a trawler dragging its nets right in front of me heading out through our inner bay.

I now have to go outside the bay in my smaller boat to find fish and game now which is dangerous and is expensive. The weather has a tendency of picking up quick with the tides once we exit our bay for fishing and if we don't plan for it with the short windows of opportunity during the summer months we risk not being able to fill our freezers for the winter. I have seen a huge decline in my experiences as the years have gone on in our inner bays. I have had to go out farther and farther and we are starting to notice the decline in all of the outer areas as well.

Everyone in our community supports this closure. The residents who call Unalaska home and are here to stay. There are companies and corporations that are about a profit and not preserving the way of life that Unalaska has made so unique to itself and region. We have made great strides in preserving what we have through all these booms in fishing industries, yet we are really starting to forget that the local residents who are not seeing to profit from these waters, but sustain a way of life are becoming jeopardized for future generations. Throughout the state of Alaska many other communities have been given this protection around their communities and it is time for us to do the same. We need to protect our rights to be able to continue to fish and hunt and I formally request you support to this proposal.

Thank You,


Fredrick Constantine Lekanoff

907-359-3990

Email: Fredrick@AriCorp.us



PO Box 291
Unalaska, Alaska
99685-0391
PH/Fax (907) 581-8222
Cell (907) 359-3417

February 17, 2013

Alaska Board of Fish

RE: Letter In Support of a Trawl Ban in Unalaska Bay Prop-162

To Whom It May Concern,

Within the Bering Sea there is a biological system comprised of millions of animals, birds, mammals, fishes and crabs, etc. Left alone it remains healthy, self correcting and sustainable due to an incredible force we call the balance of nature.

The reason man must regulate the harvest of species within this system is so things don't get out of whack. We've known this for millennia.

Unalaska Bay is a system within a system. Pollock being the most prevalent here it stands to reason every other creature in the bay interacts with it in some form or fashion. The removal of such a large portion of the Pollock in this micro system is having a negative impact and the health of the bay is suffering. We see the signs of this, in that, fishes used for subsistence and sport fishing no longer flourish here, something is happening.

Do we need a Pollock quota set for Unalaska Bay so as to reset it's balance? UNFA members have determined the health of Unalaska Bay as a top priority, not only for it's own sake, but also as it relates to the quality of life for it's residents. We have identified Pollock over fishing and by catch, as well as pollution, as primary points of concern.

Please help us in our endeavor to put the pieces back together in regards to the health and well being of this beautiful area by voting for a trawl ban in Unalaska Bay.

Sincerely,

Dustan Dickerson, UNFA Vice President



Alaska Board of Fisheries

February 18, 2013

RE: Proposal 162, Closure of Unalaska Bay

Dear Members,

I am a resident of Unalaska; I operate a small commercial fishing boat out of Unalaska and I fish for salmon, halibut, cod, and crab in this area. My livelihood has been commercial fishing since 1969. My crew is my family and we depend on healthy fisheries for our economic and physical well-being.

It is my position that Unalaska Bay should be closed to trawling because of the potential impact on the ecosystem in general, and the specific impact trawling has on bycatch species. The compromise action in February 2010 was not reasonable and did not address issues such as the lack of a sound management plan for both directed fisheries and bycatch species.

Unalaska Bay is a separate ecosystem from the Bering Sea and is unique, with a diversity of species not found in many Alaskan bays. There are directed fisheries in the Bay for halibut, salmon, crab, herring, pollock, and pacific cod and there are not many bays in Alaska that can support such an array of fishing pressure. These species are interdependent, and what is detrimental to one can affect the others' survival.

The Trawl Fleet has an overall pollock total allowable catch (TAC) for Bering Sea Aleutian Islands (BSAI) and none specific to Unalaska Bay. The Trawl Fleet has an allowed bycatch amount for BSAI and none specific to Unalaska Bay. There is no management plan for the harvest of pollock specific to the bay and no management plan for bycatch in the bay. The pollock in Unalaska Bay are suitable for fillet lines and produce a premium-finished product, a prized fish - but a prize catch without a management plan is a recipe for overfishing both pollock and bycatch species.

Halibut are opportunistic feeders. Their diet consists of, among others, salmon and pollock, two pelagic species, and so it is common to find halibut in the pelagic zone. They have been caught on salmon troll gear, in salmon seine gear, and pelagic trawl gear.

The halibut bycatch for this area is based on an overall cap for the trawlers in the BSAI (areas 4ABCDE). The bycatch cap for 2013 is 3675 mt /7,350,000 lbs. and has remained unchanged for at least the last 4 years. The catch limit for the directed halibut fishery in the BSAI (Areas 4ABCDE) was

- 8,310,000 lbs. in 2011;
- 5,901,000 lbs. in 2012, and;
- set at 4,710,000 lbs. for 2013, a reduction of 43% in the last 2 years.



More specifically, in area 4A, an area encompassing Unalaska Bay, the catch limit for the directed halibut fishery has been reduced from

- 2,410,000 lbs. in 2011, to
- 1,567,000 lbs. in 2012, and to
- 1,330,000 lbs. in 2013, a reduction of 45% in the last 2 years.

These are drastic reductions, *yet the allowed bycatch of halibut for the trawlers remain the same*. I do not think the trawl bycatch of halibut is adequately being addressed, surely not in Unalaska Bay. Note that the International Pacific Halibut Commission (IPHC) sets the catch limits for the directed halibut fishery, with stock conservation being the primary consideration. The IPHC has no authority to manage bycatch. That authority lies with the North Pacific Fisheries Management Council. Before the IPHC adopts fishery catch limits, bycatch is subtracted first.

A few years ago, there were at least four halibut charter boats working out of Unalaska. They were doing robust business, making two trips a day of six passengers, people limiting out. Today there is but one left struggling. The sport fishers and subsistence fishers now have to leave the Bay in search of a legal fish to catch.

We are fast approaching a situation where the benefit from the halibut resource is changing hands. What was once an important source of income and sustenance for the people who invested in the fishery - commercial fishers, sport fishers, and subsistence fishers, people with an economic dependency on the fishery - has become nothing but bycatch and waste to grease the wheels of trawling. This situation is not unlike that in the late 1970's when after the crash of the red crab population in the Bering Sea, and during a time when ADFG was trying to rebuild the stocks, the red crab fleet was not allowed a directed fishery but the trawlers were allowed to fish with a considerable red crab bycatch.

I am not opposed to the fishing of pollock in Unalaska Bay, but I am opposed to any fishing whether it being a directed fishery or bycatch without sound management plans.

Sincerely,

A handwritten signature in cursive script that reads "Donald Aus".

Donald Aus
F/V Good Deal



CITY OF UNALASKA
UNALASKA, ALASKA

RESOLUTION NO. 2010-02

A RESOLUTION OF THE UNALASKA CITY COUNCIL SUPPORTING THE ADOPTION BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR YEAR ROUND.

WHEREAS, the Unalaska/ Dutch Harbor Fish and Game advisory committee has submitted Proposal Number 111 to the Alaska Board of Fisheries, the advisory committee supported this proposal unanimously; and

WHEREAS, this proposal would close year round Unalaska Bay to groundfish trawling with trawl gear year round from a point at (54° 00.314' N lat., 166° 37.674 W long) to Cape Kalekta (54° 00.50' N lat., 166° 22.50 W long.) ; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the Pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area ; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river systems is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year ; and

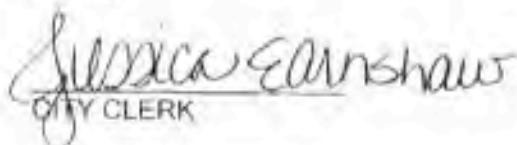
WHEREAS, proposal 111 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area.

NOW THEREFORE BE IT RESOLVED THAT, the Unalaska City Council strongly urges the Alaska Board of Fisheries to adopt Proposal 111 for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area.

PASSED AND ADOPTED BY A DULY CONSTITUTED QUORUM OF THE UNALASKA CITY COUNCIL THIS 12th DAY OF January, 2010


MAYOR

ATTEST


CITY CLERK



**Qawalangin Tribal Council
Regular Meeting
April 19, 2013**

Kate Maschner, Idaho State University, Subsistence survey;

President D. Rankin introduces Kate Maschner. (letter included)

Kate is a Sociocultural anthropologist and Associate Professor at Idaho State University. A couple of weeks ago, Kate sent some material for the Council to look over on a study she will be doing, through a grant she received from the U.S. Fish and Wildlife Services office of Subsistence Studies, which is supported by the Kodiak/Aleutians Subsistence Regional Advisory Council. The project will address priority information need for harvest data of salmon for subsistence use and expanding the study to place salmon in a broader subsistence and socioeconomic conditions of Unalaska, Nikolski, Atka, and Adak.

The reason for her study is to gather information on subsistence harvest to be able to manage these species, to fill the data gaps that are apparent to the Board of Fisheries. Kate stated that she had funding to hire a couple of workers, possibly students, to interview, and she has funds (\$40.00 each person) to pay the interviewees, a small amount for each interview. She asked when was a good time to return to do the interviews. Council Member T. C. Robinson suggested that September would be a good time. Vice-President N. E. Lekanoff asked if she was trying to get data from last year also, or starting from this year. Kate stated that we could start the time line to what ever is appropriate, the way that Fish and Game does it, is it takes the previous year but it would probably be easier to take it from the previous 12 months from when she actually came in, that would probably be easier. She would like to get a full seasonal cycle.

Council Member W. Lekanoff asked who this information goes to, Kate stated that it is funded by the Office of Subsistence Management, which is part of the Fish and Wildlife Service, it's Federal. They are based in Anchorage. She stated that she wrote the proposal because this information was identified as a research need by the Kodiak/Aleutian Regional Advisory Rack. Kate stated that a comprehensive study has not been done here since around the 1990's.

Vice-President N. E. Lekanoff asked if she talked to Fish and Game in Kodiak, they are the ones that require us to have a permit to get subsistence salmon, to catch halibut, crab, and everybody that does that is required to fill out the forms. Kate stated that she will be using these reports to compare. President D. Rankin stated as Council Member W. Lekanoff always stated is that there is a difference between traditional and subsistence, with subsistence, you need a permit and with traditional gathering, it should be our inherent right. It should be different then when someone who has just moved here for a year, but can get a permit and put a net out. Kate agreed. Council Member W. Lekanoff stated there are a lot of people here from different parts of the world, and when I see them on the beach at low tide, and when it is insisted I have a subsistence license, I am not against any survey, in fact I approve. Project Manager/ Roads Coordinator V. Tutiakoff stated that if you talk to Fish and Game here, you will find that there are about 295 permits issued here and out of that there are only ten local people who actually have them. So, you can see that there are processors here who catch fish and send it out of here. People know this and Fish and Game know about it, you can't complain because of what would happen. They are basically killing of our culture by allowing this new culture in. Atka, Nikolski are about 95% native, Adak is about 20%, but here, we are about 8%, as far as local users. President D. Rankin stated that it is not really regulated, there is no one here to regulate all those people, everything here is commercial fishing.

Project Manager/ Roads Coordinator V. Tutiakoff stated that when you talk about a subsistence survey here, there are two different types of subsistence here, we, (the Unangan people), have the need for it, and we've been doing it for thousands of years. The subsistence now days, really hurts me, when I sit on the on the Aleutian/Kodiak, the reason it came up was in the Kodiak area, was the Military was like 60%, 20%



processors, and 10% local. They were basically put in the same pot, like we are done with surveying, depending on who you survey, you will get different answers from Native and non-native. Kate stated that we should be able to see that and that the survey is anonymous and she should have said that up front, but she does collect demographic data. Project Manager/ Roads Coordinator V. Tutiakoff stated that he doesn't think Fish and Game does a breakdown of who's there, but we requested that at the Rack. Some one here on vacation doesn't even get checked when they request a subsistence permit.

President D. Rankin stated she was glad this was getting done because we have had ship wrecks here and we have no idea what has been damaged, we have no base line. Council Member T. C. Robinson stated we have no base line and you can't even catch a halibut in the bay. We will be able to give you a list of tribal users. Council Member T. C. Robinson stated there is a lot of sharing with the people here, but you can not even catch a halibut in this bay for nothing now days. Council Member T. C. Robinson stated that Fish and Game is not here for us, or the Bay would be closed. We have to go far to catch halibut. It is easier to get a sport fishing license to go catch a halibut then it is to get a subsistence permit.

Vice-President N. E. Lekanoff asked Kate about who she was going to get to help her, are they going to be high school kids? Yes, that would be good.

President D. Rankin asked when she would be the initial interviews. How long was she here for? Kate stated she will be trying to get to Atka on Monday, so she will be here for the weekend. Project Manager/ Roads Coordinator V. Tutiakoff will be leaving tomorrow. We could have a meeting with Kate on Sunday at 2 pm, along with a few other subsistence users.

The Council discussed some possible candidates for her to meet and made list of providers and users. A meeting was set up for Sunday, April 21, 2013, at the Tribal Office at 2 pm.

Kate asked if you can eat off the beach here. Council stated, No, you have to go at least 10 miles away to get good clams and such. Project Manager/ Roads Coordinator V. Tutiakoff stated there needs to be a sampling taken because PCBs is a growing hazard here and the beaches here are dead and the Captain's Bay is totally dead, and that he could get clams at Captains bay about 5-6 years ago and I opened one up just this past week, and they smelled like diesel fuel. Any thing within ten mile of this community worth gathering here is not worth it unless you're really staving.

President D. Rankin suggested Kate talk to Reid Brewer, and George Pappas who is with Fish and Game in Kodiak. He would like to come out this summer. His wife is on the Federal Board as an advisor, for the State, the subsistence Department. She's from the Bristol Bay area.

Council thanks Kate for coming. Kate left some cards.

Kate stated that she was in Akutan and did a survey of the Village and tried to survey persons from a cannery because she saw them on the beach, and the plant manager would not let her talk to them. Council Member T. C. Robinson stated that the whole Akutan Bay has 56 acres of Hydrogen chloride 18 inches deep in it and it has to be mediated by Trident. It's a dead bay, and it's happening here.



QAWALANGIN

Tribe of Unalaska

RESOLUTION #13-04

**A RESOLUTION OF THE QAWALANGIN TRIBE OF UNALASKA
SUPPORTING THE ADOPTION OF UNALASKA NATIVE FISHERMANS
ASSOCIATION'S (UNFA) PROPOSAL 162 TO THE BOARD OF FISHERIES,
TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING
WITH TRAWL GEAR, YEAR ROUND.**

WHEREAS, the Qawalangin Tribal Council is a duly elected governing body of the Federally recognized Qawalangin Tribe of Unalaska (Q. T.); and

WHEREAS, the UNFA has submitted proposal 162 to the Alaska Board of Fisheries; and

WHEREAS, this proposal would close Unalaska Bay year round to groundfish trawling with trawl gear from a point at south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. To Cape Cheerfull at 54° 01' N lat., 166° 40' W. long.; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the local pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river system is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year; and

WHEREAS, Proposal 162 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area; and





NOW THEREFORE BE IT RESOLVED THAT; the Qawalangin Tribal Council strongly urges the Alaska Board of Fisheries to adopt Proposal 162, for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area.

We do certify, that the above Resolution was approved and passed at a Regular Meeting of the *Qawalangin* Tribal Council therefore called and held the 25 day of January, 2013, at which a quorum was present and resulted in a vote of 5 ayes, 0 nays, and 0 abstaining.

Denise Rankin
Denise Rankin
President

Lillian A. Ford
Lillian A. Ford
Secretary/ Treasurer



Chairman Kluberton-

I am writing in SUPPORT of proposal 212 as written.

The current regulation, and the reasoning behind it, is outdated. Our current limited entry system is adequate to protect participation levels in the various salmon fisheries around the state. The proposed changes with 212 would, at least to my reasoning, actually lead to less participation in a given year, depending on market conditions and projected returns.

Here in the southeast drift gillnet fishery, I have seen many people expand their investment in fishing by buying into the Bristol Bay fishery. Every one of these examples that I know of had/has a family member that was willing to participate by holding a permit in one area or another. Not everyone has that option. No successful fisherman I know relies on just one fishery. Diversification is key for fishing operations. Looking around the current state fisheries, the ability to diversify is becoming more limited all the time. Here in southeast, Dungeness crab and the dive fisheries are losing areas everyday to Sea Otter depredation. The roe herring fishery is currently facing challenging market conditions making investments into that fishery a crap shoot. As a full-time professional fisherman, I see my options to invest into fisheries and grow my business as very limited by the current regulation.

One of the arguments people who are opposed to this change will bring is the issue of consolidation. I don't believe those fears are well grounded. Under the current regulation, it is allowable to hold a seine permit and a gillnet permit and fish those permits in the same registration area in the same calendar year. This has not led to any consolidation within the registration areas. Under the existing regulation, you may gillnet in Bristol Bay, and later, seine in southeast or PWS, or wherever. What difference is there that would lead to consolidation with a change in this regulation?



Another argument in opposition will undoubtedly be that consolidation will exacerbate the issue of the "graying of the fleet." I would like to point out, that yes, the fleet is aging. So are you. The reason the average age of permit holders has risen, is that people are making careers out of fishing. The people who are fishing like their jobs. It is a natural progression of the limited entry act, a system that has only been in place for slightly over 40 years. We still have quite a few active fishermen who were issued original permits with the adoption of limited entry. That is a good thing.

In the legislature, there is a bill being considered for community permit banks. The idea for this bill, at least to what I have been told, was born from the fact that 80 some % of Bristol Bay permits are owned by fishermen who do not live in the watershed. Permits have left. The problem is lack of diversification. Bristol Bay permits have been bought up by people who have fit them into their business plans. It is their job and livelihood for those few short weeks. This proposal could be viewed as an avenue for resident Bristol Bay fishermen to expand their business model, and buy into other salmon gillnet areas that have a longer season. It would give an avenue for diversification, an avenue that would include a small boat model and gillnets, a transition that would be easy to make.

In our southeast drift gillnet fishery, we have very few latent permits. This proposal has some value for our fishery, as it may encourage current southeast fishermen to grow their business and go to Bristol Bay, or PWS, or any other drift gillnet fishery they choose, while retaining their permit for southeast. When they go to the bay, or wherever, they take a net out of the water here in southeast, which is beneficial to fishermen in southeast. Depending on market conditions and run sizes, it could/would give fishermen the option of where they choose to participate in a given season and to what extent. A fisherman in Bristol Bay that has a southeast operation will probably be likely to leave sooner that grind it out to the bitter end.



The only negative that I foresee, at least from the southeast gillnet perspective, is that there may be a higher caliber fisherman overall than we have now. Certainly more motivated.

As always, thanks for consideration of my comments.

Sincerely,

Max Worhatch



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 15, 2016

VIA FACSIMILE (907) 465-6094

Tom Kluberton, Chairman
Alaska Board of Fisheries
P.O. Box 115826
Juneau, AK 99811

Re: STATEWIDE BOARD OF FISHERIES MEETING, MARCH 8-11

Dear Chairman Kluberton Board of Fisheries Members:

The Purse Seine Vessel Owners Association ("PSVOA") submits the following comments on Proposal 209, 210, and 211 before the Board at the upcoming Statewide meeting in Anchorage. PSVOA represents purse seine vessel owners throughout Alaska and the Northwest, including all of the commercial sac roe fisheries.

PSVOA Opposes Proposal 209 – Designate Pacific herring as a forage fish.

A similar proposal to designate Pacific herring as a forage fish under the Forage Fish Management Plan was rejected by the Board in March 2013. PSVOA respectfully requests the Board reject the current proposal as well.

ADF&G has a long history of prudently managing commercial herring fisheries while maintaining sustainable populations of herring in the areas fished. ADF&G provided the following comment in connection with the 2013 proposal to designate herring as a forage fish:

[P]acific herring were intentionally omitted from the Forage Fish Management Plan when it was adopted because ongoing commercial herring fisheries were already regulated to provide for sustainable and beneficial uses under the provisions of Chapter 27. The [Forage Fish Management Plan] prohibits the taking of commercial forage fish The Forage Fish Management Plan was developed for the purpose of preventing development of new directed fisheries on the forage fishes listed

In sum, the decision in 1999 to omit herring from the Forage Fish Management Plan was based on the existence of scientifically sound, abundance-based management plans for herring already in place. The Board's decision to expressly exclude herring from the Plan was not a reflection on herring's importance, or lack thereof, as a forage fish. Instead, the Board's decision was based on the fact that ADF&G management plans included provisions relating to forage. The same holds true today.



February 15, 2016
Page 2

PSVOA Opposes Proposal 210 and 211 – Prohibit directed fisheries on herring for purpose of fish meal production.

PSVOA opposes these proposals for many of the same reasons as stated above in opposition to Proposal 2009. The management of commercial herring fisheries is highly regulated and sustainably managed, and the best economical use of the resource should be allowed. It is highly unlikely that the current sac roe fisheries would ever become a directed fish meal fishery.

Thank you for considering our comments.

Very truly yours,

/s/ Robert Kehoe

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



ROUTE 2, BOX 2 - SAXMAN, KETCHIKAN, ALASKA 99901 - FAX: (907) 347-2504 - PHONE (907) 347-2502

RESOLUTION 2016-02-204

A RESOLUTION OF THE SAXMAN I.R.A. COUNCIL FROM THE ORGANIZED VILLAGE OF SAXMAN URGING THE STATE OF ALASKA BOARD OF FISHERIES TO ADOPT *PROPOSAL 209 – 5 AAC 39.212 FORAGE FISH MANAGEMENT PLAN* (SUBMITTED BY SITKA RESIDENT FLOYD TOMPKINS), WHICH IS TO OFFICIALLY ACKNOWLEDGE AND DESIGNATE HERRING AS A FORAGE FISH.

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, 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; and

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, Herring are one of most important forage fish swimming in Alaska's waters. In their role as forage fish, they are a critical prey base for a large variety of other marine organisms and species, and are vitally significance to commercial and subsistence fisheries; and

WHEREAS, the Organized Village of Saxman supports management for increased conservation to prevent herring stock from being fished-out like has occurred in other regions of Southeast Alaska. And the Tribe supports:

PROPOSAL 209- 5 AAC 39.212, Forage Fish Management Plan - Designate Pacific herring as a forage fish as follows:

5 AAC 39.212 Forage Fish Management Plan is amended to read:

...(f) For the purposes of this section, "forage fish" means the following species of fish:

(10)Family Clupidae (Pacific herring)...

The Tribe would like the Board of Fisheries to address this issue because Herring (*Clupea pallasii*) fill the exact ecological niche described in the *Forage Fish Management Plan*. Herring feed on zooplankton and phytoplankton, and in turn are food for seabirds, salmon, and marine animals. Herring, especially the



Submitted By
Richard L Brown
Submitted On
2/18/2016 4:05:43 PM
Affiliation
Adventure Sixty North LLC

Phone
9072242600

Email
adventure60north@gmail.com

Address
31872 Herman Leirer Rd
PO. 2487
Seward, Alaska 99664

Voicing my objections to PROPOSAL 203 – 5 AAC 75.003. Emergency order authority.

Seward Alaska has vital interests for many reasons to oppose this proposal. We see it if passed a hardship on the community, State of Alaska and its sport fishing enthusiasts. With the economic bust of the oil prices falling and causing increased pressure to have other parts of the economy pick up the slack, adding a shut down of this fishery surely will not help with the states woes.

Rick Brown Owner Adventure Sixty North LLC Seward, Alaska



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

February 18, 2016

Re; Support for Proposal 126, Alternative Harvest Method for the Sitka Herring Seine Permittee

Dear Chairman Kluberton and Board of Fisheries Members,

I have been looking for a more recent Policy on Utilization of Herring Resources and have not found it. I did find "Statement of Provisional Policy on Utilization of Herring Resources" Feb 13, 1976.

It says "The statutory responsibility of the department is to manage and extend fish resources in the interest of the economy and general well-being of the state." It also says ""#6 A further vital consideration is House Concurrent Resolution No. 75 and the sequent Alaska Board of Fish and Game directive to "phase out the wasteful herring sac roe fishery of the state""

With these ideas in mind it seems proposal 126, an alternative harvest method for the GO1A permittee, fits the direction of the policy. Open pounding in Sitka would harvest herring roe without killing the fish.

Best regards,
Darrell Kapp
GO1A permittee



CDFU COMMENTS

February 16, 2015

ATTN: BOF COMMENTS

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

RE: 2016 STATEWIDE FINFISH AND SUPPLEMENTAL ISSUES

Dear Chairman Kluberton and Members of the Board;

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

Thank you for the opportunity to comment on Proposals as part of the 2016 Statewide Finfish meeting in Anchorage. Below, you will find comments prepared by Cordova District Fishermen United on behalf of the Board of Directors and members of the commercial fishing fleet in Prince William Sound and Copper River.

#203 Expand emergency order authority to close sport fishing in special harvest areas if hatchery cost recovery goals may not be met - SUPPORT

Alaska's private-nonprofit hatcheries are responsible for fisheries enhancement programs that provide increased opportunities statewide for all user groups and the authors' need is clearly explained. Cost Recovery and Brood Stock collection are basic tools necessary to functional hatchery operation in the State of Alaska. Ensuring hatcheries proper access to these tools ensures the provision of long-term opportunity for all users.

#209 Designate Pacific Herring as a forage fish - OPPOSED

Herring represent one of Alaska's many commercially harvested fish species. Healthy and diversified commercial fisheries contribute to sustainable communities and generate revenue that benefits the state of Alaska. The Prince William Sound herring stocks are in an advanced rebuilding stage and a forage fish designation would exclude our region from the opportunity of a commercial harvest in times of biological surplus. This would impact our commercial fishing dependent region by removing access to diversification, which brings



CDFU COMMENTS

stability to individual commercial fishing businesses and add value to local economies as well as generate additional revenues that benefit the entire state.

#210 Prohibit directed fisheries on forage fish species, for the purpose of fishmeal production - OPPOSED

#211 Prohibit the production of fish meal from whole forage fish -OPPOSED

Because it's already illegal to commercially harvest those species listed in the Forage Fish Management Plan, this proposal is unnecessary and if adopted would specifically limit a value added opportunity for a legal commercially harvested species. ADF&G

We trust that the points we raise in these comments provide you with sufficient information to aid your final determinations during this regulatory cycle.

Sincerely,

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



Southeast Alaska Fishermen



PC 44
1 of 6

9369 North Douglas Highway

Juneau, AK 99801

Phone: 907-586-6652

Email: seafa@gci.net

Fax: 907-523-1168

Website: <http://www.seafa.org>

February 15, 2016

Alaska Dept. of Fish & Game Board Support
Board of Fisheries
Tom Kluberton, Chair
PO Box 115526
Juneau, AK 99811

Dear Tom Kluberton, Chair and Board of Fish Members,

RE: STATEWIDE BOARD OF FISH PROPOSALS

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species organization representing our 300+ members involved primarily in the salmon, crab shrimp and longline fisheries of Southeast Alaska, although our members are involved in many other fisheries.

Proposal #203 – SUPPORT: SEAFA supports this proposal to allow ADF&G to have the authority to close sport fishing in a special harvest area (SHA) when necessary to protect broodstock and when necessary for cost recovery harvests WHEN the area is already closed to commercial fishing. In order to sustain the returns that the public has come to rely on from the hatchery returns mixed in with the wild returns in common property fisheries, hatcheries must be able to get broodstock (the equivalent of escapement) and they must have adequate funds which is generated by cost recovery to continue the returns in to the future. We do not expect that this will need to occur that often but it would be best to clarify that the hatchery operator and ADF&G working together can determine when this action would be necessary.

Proposal #209 – OPPOSE: SEAFA opposes this proposal requesting that Pacific Herring be added to the forage fish management plan. As was stated in the 2013 ADF&G staff comments on a similar proposal, the forage plan was developed to prevent the development of NEW directed fisheries on forage fish species but herring was specifically omitted because there were



ongoing directed fisheries with sustainable management plans in place. SEAFa does not see the need for any change to the status quo, either the management of the herring fisheries or the forage management plan.

Proposal #210-#211 – OPPOSE: SEAFa opposes these two proposals that would prohibit the use of forage fish species for the purpose of the fish meal production. The species that are currently listed on the forage fish management plan are already protected from the development of a commercial fishery. The herring fishery that is exempt from the forage fish management plan is sustainably managed by the Board of Fish, ADF&G and State of Alaska, if there is a better economic opportunity on a sustainable fishery resource that use should not be disallowed as long as it is not a new directed fishery but the current fishery be redirected into a new use.

Proposal #212 – SUPPORT: SEAFa supports this proposal to allow a permit holder to fish either or both of their permits within the same year but maintain that each area must have a separate vessel associated with it. This practice is currently occurring but is unfair to single individual/permit holders without family members to put their name on the second permit to allow it to be fished.

Proposal 126-2014-2015 – OPPOSE: SEAFa opposes this proposal to establish a commercial open pound herring spawn on kelp fishery in Sitka Sound by converting Sitka Sound herring sac roe permits. SEAFa participated in the CFEC hearing on this issue and we have attached our written comments for that process to this testimony to provide greater depth to our comments provided here. From our attendance at the Board of Fish meeting last year and at the CFEC hearing and from our membership, there does not seem to be any support for this proposal other than from the proponent.

We are opposed to changing the characteristics of a permit when there is not overwhelming support from the permit holders who own the permits. In this case you are affecting Sitka Sound sac roe herring permit holders and Northern Southeast roe on kelp permit holders. The Northern southeast roe on kelp permit holders testified at the CFEC hearing that this would significantly affect their current market which is limited as well as their permit value.

This proposal raises two important issues, what the effect is when you take the same permit and allow some of those permit holders to fish not only a different gear type but produce a different product. Second, we believe that this proposal would be inconsistent with the State of



Alaska Board of Fisheries vs Grunert legal decision allocating **within** a fishery. Since the Sitka sac roe fishery is a GHM (quota) managed fishery, to stay within the GHM you would have to allocate between the two gear types if you were to pass this proposal.

Sincerely,

A handwritten signature in black ink that reads "Kathy Hansen" followed by a long horizontal line.

Kathy Hansen
Executive Director



Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone: 907-586-6652

Email: seafa@gci.net

Fax: 907-523-1168

Website: <http://www.seafa.org>

November 12, 2015

Commercial Fisheries Entry Commission

Attn: Randy Lippert

8800 Glacier Hwy, Suite 109

PO Box 110302

Juneau, AK 99811-0302

Sent via email: randy.lippert@alaska.gov

Dear Commissioners,

Southeast Alaska Fishermen's Alliance (SEAFSA) is opposed to removing the Sitka Sound area from the Northern Southeast herring spawn-on-kelp pound (ROK) fishery administrative area. SEAFSA is a multi-gear/multi-species commercial fishing association representing our 300+ members.

We attended the hearing on November 6th and if we understand correctly there are actually two issues being addressed. The first is whether in limiting the ROK fishery if CFEC used the correct area designation and the second is the Board of Fish (BOF) proposal, its process and whether the conversion of the permits as described in the BOF proposal is consistent with CFEC. The BOF proposal if passed in March would actually take a second CFEC hearing.

We will first address our opinion on the question about whether the CFEC original designation of the administrative area was correctly considered. During the hearing, you heard testimony that an open pound herring fishery did occur in the waters of Sitka Sound prior to limited entry and at the time of limited entry for the pound fisheries and areas were still being adjusted so the two permits were separated into a Northern and Southern Area permit and any fisheries to be established within the area would be available to the permit holders of that area. Permits have



been bought and sold and loans made against the permit based on the assumption that any opportunity in the Northern area for a pound fishery (open or closed) would be an opportunity for the ROK permit holder. Since limited entry of this fishery, new additional areas have been authorized by the Board of Fisheries (for example, the Tenakee fishery). In addition the testimony about the market factors were quite compelling in the ability to flood the market and crash the price. **SEAFA is opposed to any change to the administrative area for the Northern Southeast Roe on Kelp permit.**

In testimony to the second part of this issue, we are also opposed to passage of the Board of Fish Proposal or allowing a change in gear type for the following reasons. We do not believe that the BOF proposal #126 can be made into a set of regulations that would be defensible against lawsuits based on limited entry law and the State of Alaska Board of Fisheries vs Grunert¹ legal decision. Proposal #126 asks to allow some seine sac roe permit holders to be able to fish a different gear type, open pound. Since the Sitka Sound sac roe fishery is a quota based management fishery, in order to allow some permit holders to fish with a pound you would have to allocate between the two gear types which hold the same permit. This in turn treats individual fishermen differently based on the allocation you give the different gear types even though they hold the same permit. In Grunert it states, *"We note that the board's allocation of the harvestable salmon between the cooperative and the open fishers was potentially arbitrary and capricious. Allowing some, but not all, Chignik salmon purse seine permit holders to operate different types and amounts of fishing equipment potentially raises questions of efficiency, arbitrary decision making, and equal protection.⁶⁵ The allocation may be vulnerable to attack on the theory that under a two-subfishery system, the open fishers only have access to a small percentage of the allocation for the whole Chignik fishery.⁶⁶ Grunert contends that allowing open and cooperative fishers to use different amounts and types of equipment may violate subsection .150(a) of the Limited Entry Act.²"* We believe that the Board of Fisheries would have trouble developing a set of regulations and not falling into it being an arbitrary and capricious decision. **If the best use of herring in Sitka Sound is by pound gear then an allocation and regulations should be made for the use by current Northern SE ROK permit holders and not trying to divide and treat permit holders holding the same permit differently.**

¹ State of Alaska Board of Fisheries vs Grunert [h p://caselaw.findlaw.com/ak-supreme-court/1119517.html](http://caselaw.findlaw.com/ak-supreme-court/1119517.html)

² State of Alaska Board of Fisheries vs Grunert [h p://caselaw.findlaw.com/ak-supreme-court/1119517.html](http://caselaw.findlaw.com/ak-supreme-court/1119517.html) ³ [h p://www.sf.adfg.state.ak.us/fedaids/pdfs/RIR.1J.2000.01.pdf](http://www.sf.adfg.state.ak.us/fedaids/pdfs/RIR.1J.2000.01.pdf)



At the hearing, a very valid point raised is that not only would you be **authorizing the use of a different gear type but you would be producing a different product form**. This would make it impossible to determine an optimum number if necessary as the two gear types and products would not be comparable. This was an issue that was raised in the Board of Fisheries vs Grunert decision¹.

Fishermen at the hearing provided substantial testimony about the effect increasing the amount of product on the market would have which would provide substantial negative impact on their own markets, and more importantly their permit values.

We read through the report³ produced following the 1998 and 1999 experimental pound fishery in Sitka Sound. This report raised the concern by the Department that while no conflicts with the sac roe fishery or subsistence fishery occurred in the experimental fishery they “cautioned that gear conflicts are possible depending on the amount of gear which might be allowed in such a fishery. (page 6)” Another concern/question raised in the report was would there be sufficient *Macrocystis kelp* be available to support a new fishery in Sitka Sound and might early season use for Sitka affect kelp availability in other existing fisheries (page 7).

We hope the above comments will help in your decision making process and that you will not only take the time to address the first issue **but provide guidance to the Board of Fish of possible actions in regards to BOF proposal #126 that would be inconsistent with Limited Entry law and previous court decisions**.

Please contact us if you have any questions about our comments or need additional information or clarification.

Sincerely,

A handwritten signature in black ink that reads "Kathy Hansen" followed by a long horizontal flourish.

Kathy Hansen
Executive Director



February 12, 2016

To: Board of Fisheries Tom Kluberton, Chair
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Support for Proposal 126

Dear Chairman Kluberton and Board Members,

Please support Proposal 126 and allow permit holders in Sitka Sound an alternative harvest method of open pound roe on kelp. The fishery, as it will exist this year, will mobilize well over 100 million dollars of capital investment to catch approximately 2 million dollars' worth of fish. This represents a ridiculous lack of value for everyone in the fishery. If open pounding was added as an alternative harvest method to the seine fishery it would allow an option to gain a greater return on investment. Nobody would be forced to do it but at least the option would be there. A proposal to add value to the fishery while killing less fish is an idea that should be supported. Proposal 126 would be a positive change for the Sitka Sound sac roe fishery.

Thank you for your time,

Steve Feenstra
Sitka Sound Seine Permit Holder

A handwritten signature in black ink, appearing to read "Steve Feenstra", written over a horizontal line.



Submitted By
Steve Reifentuhl
Submitted On
2/17/2016 1:09:57 PM
Affiliation
Alaska Herring Conservation Alliance

Phone
9077383509
Email
steve.reifentuhl@gmail.com
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218 Shotgun
Sitka, Alaska 99835

ALASKA HERRING CONSERVATION ALLIANCE

P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

February 15, 2016

Alaska Dept. of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811

Re: Oppose Proposals 209, 210, & 211 – Herring in FFMP, Fish Meal Prohibition

Dear Chairman Kluberton and Board of Fish Members:

The Alaska Herring Conservation Alliance (AHCA) submits these comments in opposition to Proposals 209, 210, & 211 that you will be considering at the March 8 – 11, 2016 meeting in Anchorage. AHCA is statewide member organization that represents herring sac roe permit holders, major herring processors, as well as tender men & boat owners, crew, and families associated with herring fisheries throughout the state. AHCA members participate in herring sac roe fisheries from Norton Sound to Togiak to Craig, Alaska. AHCA looks forward to working with the board at the March meeting in Anchorage, particularly pertaining to the forage fish issue.

It is fairly clear from the BOF record going back to at least 2009 and every three year cycle in SE Alaska finfish and statewide since, that the proposers of 209, 210, & 211 want to subvert or preclude herring fisheries in Sitka Sound in particular and statewide in general. These proposals are another step in reaching that goal. The proposals were not supported by the Sitka advisory, where the authors reside and/or sit on the AC.

Proposal 209 - In 1998, the board of fish adopted [5 AAC 39.212. Forage Fish Management Plan](#) which established nine marine fish families as forage fish. These nine families, including sand lance, euphasids, capelin and six others were not commercially harvested at the time, and therefore by definition would be excluded from existing or future commercial fisheries. At the same time the board of fish intentionally did not include herring, shrimp, and Pollack, among many other species in 5 AAC 39.212. Forage Fish Management Plan; they were precluded because they had existing fisheries and management plans. Existing/ongoing fisheries were left out recognizing that ADF&G had biologically driven, abundance based management plans on those species. Designation of a family in the FFMP dictated it would not be developed for commercial harvest. This designation was not definitional in the sense of species or marine fish-family ecological niche. The goal was and should be sustainable management and scientifically based harvest guidelines.

Therefore, arbitrarily changing one species within Clupeidae to forage fish designation as Proposal 209 proposes, introduces considerable confusion and additionally overturns a former board of fish action that was consistent and logical. Proposal #209 appears to be more than semantics, or put forth for the sake of clarity, otherwise why not modify the entire Forage Fish Plan using the biological definition of forage fish. Proposal 209 has an ulterior motive in a two step process, 1) put herring into Forage Fish Management Plan, 2) at a later date eliminate herring harvest as per other nine families in management plan.

Furthermore:



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2 of 2

1. There is no conservation concern. Togiak herring are healthy and booming; Sitka Sound herring have since the state began managing it in 1960. The increase biomass of the Sitka Sound herring has been dramatic, by a factor of ten since statehood. The 2016 estimated stock biomass is 78,372 tons, just under the recent ten-year average. Herring like most populations have highs and lows, but most importantly the state manages on abundance, using principles of precautionary management, sustainability, and good science.
2. The Board of Fish did not make an error in [5 AAC 39.212. Forage Fish Management Plan](#), but rather the Board made a conscious decision to continue sustainable commercial fisheries on herring and Pollack. These are fisheries that communities from Nome to Kodiak to Metlakatla depend upon for economic survival.
3. Since the 1998 FFMP, Sitka Sound herring biomass has doubled in the intervening 16 years, and Togiak herring biomass is even larger.

Proposal 209 is inconsistent with the current language in [5 AAC 39.212. Forage Fish Management Plan](#). It is true the language for inclusion of herring can be massaged to be the one exception in the FFMP, but for what biological, sustainability, or clarity/consistency reason? If the inclusion does not affect the harvest or GHF or contribute to sustainable management, the proposal should not be adopted into regulation.

Proposal 210 & 211 – The current 1998 FFMP precludes fisheries on sand lance and smelt mentioned in the proposals so that issue in the proposal is adequately covered. Herring is outside the FFMP and therefore commercial harvest of herring is provided, although there are no herring fisheries in Alaska specifically for the production of fish meal. Processors for the most part freeze whole herring for sale in foreign markets. Herring roe is the most valuable product form but other forms include bait, canned herring, by products to pet food, and undoubtedly some portion goes to meal and nutraceuticals.

If the intention of proposal 210 is to preclude herring fisheries based on whether a sovereign nation's corporations' process any portion of the byproduct in a meal form it could be devastating to Alaska's most import industry – fishing. This issue would seem to be more appropriately addressed in the domain of the North Pacific Fisheries Management Council. Finally, this proposal appears to have crossed legal boundaries better addressed by the attorney general's office.

Proposal 211 is plainly targeting herring fisheries by prohibiting any production of fish meal from listed or exempt species in the FFMP.

Proposals 209, 210, & 211 have no merit and should be voted down as they were at the Sitka AC where representatives of the proposals made their case.

AHCA members and I will attend the Anchorage meeting and would be happy to meet with board members or serve on committee.

Thank you for your consideration in this matter.

Sincerely,

Steve Reifenhuth

Executive Director AHCA

Reference for Management Plan: [http://www.legis.state.ak.us/basis/folioproxy.asp?url=http://www.jnu01.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=\[JUMP:'5+aac+39!2E212'\]/doc/{@1}?firsthit](http://www.legis.state.ak.us/basis/folioproxy.asp?url=http://www.jnu01.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=[JUMP:'5+aac+39!2E212']/doc/{@1}?firsthit)



Submitted By
Stoian Iankov
Submitted On
2/16/2016 10:03:34 AM
Affiliation

February 16, 2016

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

Re: Statewide Finfish and Other Supplemental Issues
Proposal 215

Chairman Kluberton and members of the board

My name is Stoian Iankov, my family and I own/operate the f/v Michelle Renee, a shore side trawler based in Kodiak, Alaska. We have been involved in the GOA trawl fisheries for 31 years, and have Central and Western GOA endorsements.

We depend on the GOA fisheries for our livelihoods, since our vessel is a non-AFA. Removing our vessel from the inside the 3 mile Pollock fishery will have a detrimental effect on our business, since most of the time the Pollock are aggregated there.

If proposal 215 is implemented we will be forced to fish in areas that have less Pollock and more by catch. And it could result in premature closure of the fishery and thus affecting the communities in the GOA.

Thank you for the opportunity to comment on this topic.

Sincerely,

Stoian Iankov



RESOLUTION 2016-02-203

A RESOLUTION FROM THE ORGANIZED VILLAGE OF SAXMAN BY THE SAXMAN I.R.A. COUNCIL IN SUPPORT OF SITKA TRIBES OF ALASKA FISH PROPOSALS 210 AND 211 URGING THE STATE OF ALASKA TO ADOPT FISH PROPOSALS TO PROHIBIT DEVELOPMENT OF DIRECTED FORAGE FISHERIES FOR THE PURPOSE OF FISH MEAL PRODUCTION AND TO PROHIBIT THE PRODUCTION OF FISH MEAL FROM WHOLE FORAGE FISH CAUGHT IN EXISTING FORAGE FISH FISHERIES.

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, currently the Sitka Sound herring stock is the only remaining and surviving herring stock in Alaska that supports a viable subsistence harvest; however the herring are being pushed to the brink of extinction in Southeast Alaska regions; and

WHEREAS, the State of Alaska Board of Fisheries has due diligence with a powerful position to preserve remaining herring stock and bring recovery to increase herring stock and promote herring conservation rather than falling into a disaster with complacent management or unsound conservation, and

WHEREAS, Herring are one of the most important forage fish in Alaska's waters, because they transfer energy from phytoplankton and zooplankton up the marine food chain to upper trophic level fish (salmon, halibut, rockfish, etc.), marine birds, and marine mammals, and

WHEREAS, Herring are an ecological keystone species because they support the base of the marine food web and are fundamental to the success of Alaskan fisheries for sport/recreation, subsistence, commercial use and the tourism industries, and

WHEREAS, Herring have had a profound effect on Alaska Native cultures for thousands of years as a direct food sources and indirectly by supporting the marine ecosystem, which provides additional subsistence foods. Herring are so engrained in the lives and history of Alaska Natives they are considered a significant cultural keystone species.

WHEREAS, the Organized Village of Saxman supports management for increased conservation to prevent herring stock from being fished-out like has occurred in other regions of Southeast Alaska. And the Tribe supports a modification to proposals and supports proposals as amended:



February 11, 2016

To: Board of Fisheries Tom Kluberton, Chair
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Support for Proposal 126

Dear Chairman Kluberton and Board Members,

I am writing to encourage the Board to support Proposal 126 and allow permit holders in Sitka Sound to choose between harvesting spawn on kelp with open pounds or seining for sac roe. Allowing the option of open pounding to the seine fishery adds value to the fishery while reducing pressure on the resource. There is enough socio-economic pressure on the Sitka seine fishery to warrant a change in the fishery. Proposal 126 would be a positive change for the Sitka Sound sac roe fishery.

Thank you for your time,

Terry Kilbreath
G01A Permit Holder



Submitted By
Tom Evich
Submitted On
2/11/2016 6:58:40 PM
Affiliation
Self

Phone
360 450 4761
Email
tomevich@comcast.net
Address
2051 N. Shore Rd.
Bellingham , Washington 98226

Dear Chairman Kluberton,

I oppose proposal 215 that places a ≤58 foot vessel restriction inside state waters in the Western Gulf. I have been to B.o.F meetings twice in the last 3 years opposing proposals that, I believe, would reallocate money (bottom line, that's what we're talking about here) from me, to someone else. I own an under 60' trawler that may in some way benefit from this proposal. The first reason I oppose this proposal is because I believe it would be hypocritical of me to have argued at the end of Nov. last year, not to reallocate fish from the fed waters to state waters, but then stay silent while some try to reallocate fishing area from others, to me. I'm skeptical of any outcome other than increasing animosity among user groups.

The 2016 pollock A season is the 2nd reason I am in opposition. We had one over 60', Bering Sea trawler that was fishing with us this year. There are two areas close to Sand Pt. from which most of the pollock is taken. One of those areas is all in state waters and the other is all in federal waters. There was a higher abundance of salmon in the area in federal waters this past A season. Had that boat been confined to that area that was in federal waters, his trips would have had much higher salmon numbers than if he had been allowed in the area in state waters. Also remember that there is a Chinook salmon PSC hard cap of 6,684 salmon for the entire annual WGOA pollock fishery, when this cap is reached all pollock fishing shuts down whether inside or outside 3 miles. If this vessel is forced to fish where the salmon bycatch is higher those higher rates will affect all of the WGOA pollock fleet not just him. For this year, this same boat will not fish in the W. Gulf for the rest of the year. Had that boat, again, been restricted, he may have had the attitude that he doesn't need the salmon for the rest of the year so might as well take the short sighted view, catch what he can catch. The rest of the year, and the rest of us be damned. Human nature. Remember, big boat, small boat, we're all just try to make a living here.

I am also curious how this would be enforced? Does the state have the resources to place a patrol vessel in the area? VMS? How will the monitor know whether the boat is towing or just running slow?

The G.O.A. has serious challenges such that our very survival is in question. I just don't think it does any of us any good for the B.o.F. to continue to change the rules. I heard board member Sue Jeffery, while deliberating at the meeting I attended, state that "fishing boats are just small businesses". Exactly, and business does not like instability, and that is what the B.o.F. is doing by changing the groundfish rules every 3 years. I ask the board to, please, let's leave well enough alone.

Sincerely

Tom Evich

Owner/Operator

F/V Karen E



Mailing Address: PO Box 20229, Juneau AK 99802-0229
Physical Address: 410 Calhoun Ave Ste 101, Juneau AK 99801
Phone: (907)586-2820 **Fax:** (907) 463-2545
Email: ufa@ufa-fish.org **Website:** www.ufa-fish.org

February 10, 2016

Tom Kluberton, Chairman
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: STATEWIDE BOARD OF FISH MEETING MARCH 8-11

Dear Chairman Kluberton and Board Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. We are taking this opportunity to comment on proposals that affect the Alaska commercial fishery that are not allocative between fisheries.

UFA SUPPORTS proposal #203, which would provide clarity for Alaska Department of Fish and Game (ADF&G) to close by emergency order a special harvest area or a portion of a special harvest area to sport fishing when commercial harvest within that special harvest area has been closed to achieve hatchery escapement goals. This measure ensures ADF&G managers have the authority to do what is needed to maintain salmon enhancement, which depends on adequate brood stock eggs, and the economic harvest of a portion of the return for common use and the benefit of sport, subsistence and commercial fisheries.

UFA OPPOSES proposal #209, which would designate Pacific herring in the Forage Fish Management Plan. UFA opposes the addition of herring to the Forage Fish management Plan, because we feel this would create a conflict between the 1999 Forage Fish management plan's prohibition of the commercial taking of forage fish and the longstanding commercial fisheries on herring, which have been operating with prudent management while sustaining populations of herring in the areas fished. According to ADF&G comments from 2013, "...Pacific herring were intentionally omitted from the Forage Fish Management Plan when it was adopted because ongoing herring fisheries were already regulated to provide for sustainable and beneficial uses under the provisions of Chapter 27. The plan prohibits the commercial taking of forage fish, except as provided in regulatory chapters 5 AAC 03-5 AAC 39. The Forage Fish Management Plan was developed for the purpose of preventing development of new directed fisheries on the forage fishes listed..." Proposal 209 is inconsistent with the purpose of the plan, in its recognition of longstanding herring fisheries, and is an invitation for future attempts to eliminate these fisheries and the associated benefits to the participants, communities, and public consumers.

UFA OPPOSES proposal #210 & 211, which would prohibit directed fisheries on forage fish species for the purposes of fish meal production. UFA opposes these proposals for many of the same reasons as in Proposal #209. The management of the herring fisheries is very



tightly regulated and sustainably managed, the best economical use of the resource should be allowed. It is unlikely that the current sac roe fisheries would ever become a directed fish meal fishery.

Thank you for your consideration of our comments on these proposals.

Sincerely,

Jerry McCune
President

MEMBER ORGANIZATIONS

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



Submitted By
United Southeast Alaska Gillnetter
Submitted On
1/24/2016 10:22:08 AM
Affiliation

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Petersburg, Alaska 99833

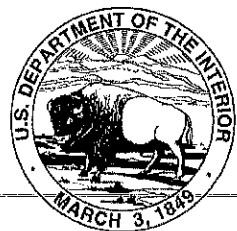
~~United Southeast Alaska Gillnetters (USAG) Comments
for Statewide finfish BOF 2016
submitted via online form

Proposal 216- SUPPORT. USAG believes that the state should explore and allow new fisheries that would and could diversify the fishing fleets. At this time there appears to be a biomass of pollock in Southeastern Alaska that is not being utilized that could allow economic benefits to the region. We feel there are numerous safeguards in place in this proposal to address many of the concerns that may arise from the prosecution of this fishery. In addition to the safeguards mentioned in the proposal, we would recommend a sunset clause of one board cycle to allow BOF data review.

Proposals 209, 210, 211- OPPOSE. Our position on these three proposals is based on the fact that industry relies on diversity. Herring fisheries comprise a large part of industry effort from Metlakatla to Norton Sound. Coastal communities look to herring fisheries as a kick start, not only to commercial fishermen, but also for processing and tendering jobs. These proposals would, in our opinion, preclude herring from being a commercial species. As market conditions change, different product forms need to be explored and considered. The state of Alaska is currently facing tough economic times due to low volumes and low prices for crude oil. We feel that given the current economic conditions, precluding any currently harvested species could have grave economic impacts.

Proposal 126-OPPOSE. Our opposition to this fishery is based on the fact that there is already a gear group that harvests the same product that this proposal would allow. We are concerned that if adopted, this proposal would allow herring sac roe seiners options that would allow them to change to roe on kelp and back to sac row depending on market conditions. Allowing this could and probably would, flood the roe on kelp markets, effecting the conditions for years, given the volume of the sac roe fishery. It is our feeling that if Mr. Kapp would like to pursue roe on kelp in Sitka Sound that he purchase a Northern Southeast Herring Roe On Kelp Pound Permit and submit a proposal for some of the quota there. If he would like to change current regulations to allow open pounds, he may submit a proposal for that. Changing a seine fishery to an entirely different gear type sets a precedent that could open the door to draconian changes to our current existing fisheries. While we do applaud the effort to address changing market forms, a proposal of this type is not the way to go about this.

Proposal 203 SUPPORT- We feel that this proposal is necessary for a number of reasons. While it may appear draconian to close a THA to sport fisheries in cases of cost recovery needs, it is important to note that these fish were created through the purview of the associations, and in some cases, through taxing the commercial salmon fishery. Enhanced fish has created opportunities for sport and sport charter that many take advantage of. Many sport charter operations target these enhanced fish for their annual operations at no cost to them to their economic benefit. This proposal would not preclude their continued harvest of those fish generally. It would only preclude them from the THA when there were concerns for brood stock or cost recovery. I could see safety issues regarding THA harvests in that sport fishermen, in prosecution of their fishery, could interfere with the harvest of brood stock or cost recovery fish simply by being in the way. It is our opinion that any closure that this proposal would allow would not be long in duration, and would not be enforced often. It is not the intention of the associations to preclude sport harvest, only to preclude it in THA's in times of low abundance.



United States Department of the Interior Fish and Wildlife Service



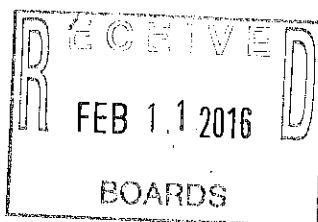
Office of Subsistence Management
1011 East Tudor Road M/S 121
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

FWS/OSM 16001.GP

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

FEB 08 2016



Dear Chairman Kluberton:

The Alaska Board of Fisheries will deliberate 59 proposals, among other issues, at its Alaska Peninsula / Aleutian Island / Chignik Finfish meeting from February 23-29, 2016. We have reviewed the proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on proposals that have potential impacts on Federal subsistence users and fishery resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

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

Enclosure

cc: Sam Cotten, ADF&G
Tim Towarak, Chair FSB
Lisa Olson, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Scott Kelly, ADF&G, Juneau
Tom Brookover, ADF&G, Anchorage

Glenn Haight, ADF&G, Juneau
Drew Crawford, ADF&G, Anchorage
Jill Klein, ADF&G, Anchorage
Stewart Cogswell, OSM, Anchorage
Interagency Staff Committee
Administrative Record



**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS**

ALASKA PENINSULA / ALEUTIAN ISLANDS / CHIGNIK FINFISH

**State of Alaska
Board of Fisheries Meeting
February 23 – 29, 2016
Anchorage, Alaska**



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Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation in the Alaska Peninsula, Aleutian Islands, and Chignik Areas.

Proposal 172 requests an increase of the passage of late-run Sockeye Salmon above the Chignik River weir to provide for additional late-season subsistence fishing opportunity. The proposal requests 50,000 Sockeye Salmon be added to the existing escapement schedules in August and an additional 50,000 Sockeye Salmon in September. If this proposal is adopted as written, the Chignik River late-run Sockeye Salmon goal range will be 350,000 to 550,000 fish.

Existing and proposed Chignik River late-run Sockeye Salmon escapement goals in thousands

Existing Goals

Sustainable Escapement Goal	Inriver Goal August	Inriver Goal September	Total Escapement Goal
200-400	25	25	250-450

Proposed Goals

Sustainable Escapement Goal	Inriver Goal August	Inriver Goal September	Total Escapement Goal
200-400	75	75	350-550

Proposed Goals with Modification offered by the Chignik Area AC

Sustainable Escapement Goal	Inriver Goal August	Inriver Goal September	Total Escapement Goal
200-400	50	25	275-475

Existing State Regulations:

5 AAC 15.357 Chignik Area Salmon Management Plan

(b)(3) from the end of the transition period, described in (2) of this subsection until September 14,

(B) the department shall manage the commercial fishery to allow for the passage of at least 50,000 sockeye salmon above the Chignik River weir, in addition to late-run sockeye salmon escapement needs, to provide an in river harvestable surplus above the Chignik River weir in August and September of



at least 25,000 fish in August and 25,000 fish from September 1 through September 15;

Existing Federal regulations:

~~50 CFR 100.27(e)(8) Chignik Area.~~

(i) You may take fish other than salmon, rainbow/steelhead trout, or char at any time, except as may be specified by a subsistence fishing permit. For salmon, Federal subsistence fishing openings, closings and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action. Within the Chignik Area, depending upon the area that you may fish, in addition to a State subsistence fishing permit, you may be required to also have a Federal subsistence permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations through April 1, 2016.

Impact to Federal subsistence users/fisheries: Yes. The adoption of this proposal as written could result in an additional 100,000 late-run Sockeye Salmon to escape into the Chignik River watershed above currently established goals. This additional late season escapement could result in additional opportunity for Federally qualified subsistence fishermen for fall to early winter harvest of "redfish". If the proposal is adopted as written and a total additional 150,000 Sockeye Salmon are allowed to escape through the Chignik weir above the Sustainable Escapement Goal (SEG) of 200,000-400,000.

Adoption of the September escapement goal portion of the proposal as written is unlikely to impact Federal subsistence users or fisheries. During the month of September, little, if any, commercial exploitation is focused on the latest arriving portion of the Sockeye Salmon return to the Chignik River watershed. As such, fisheries managers have limited tools to increase escapement into the system because the Sockeye Salmon commercial fishery, fishermen, and processors have normally ceased operations for the season.

Federal Position/Recommended Action: The Office of Subsistence Management **supports this proposal with modification offered by the Chignik Area Local Advisory Committee.** The Office of Subsistence Management supports the modifications offered by the Chignik Local Advisory Committee. The Office of Subsistence Management supports modifying the proposal to increase the existing August escapement schedule through the addition of 25,000 Sockeye Salmon. If adopted with the recommended modification, the new late-run escapement schedule for the month of August would be approximately 99,000 to 116,000 late-run Sockeye Salmon through the weir. The Office of Subsistence Management recommends keeping the escapement schedule for September unchanged. The new late-run Sockeye Salmon goal would be 275,000 to 475,000 fish.

According to Fisheries Manuscript Series No. 13.06¹ the Chignik River late-run Sockeye Salmon escapement, which will provide maximum sustained yield (Smsy), is 315,000 fish. Adoption of this

¹ Sagalkin, N. H., A. St. Saviour, J. W. Erickson, and H. Finkle. 2013. Review of salmon escapement goals in the Chignik Management Area, 2013. Alaska Department of Fish and Game, Fishery Manuscript Series No. 13-06, Anchorage.



proposal with the recommended modification will result in an escapement goal range with a lower end which is 40,000 fish below Smsy and an escapement goal range with an upper end of 85,000–160,000 fish above Smsy, depending upon how 5 AAC 15.357 (b)(3)(B) is interpreted by managers. From the same document, the escapement producing recruitment equal to escapement (Seq – or replacement) for the Chignik River Sockeye Salmon late run is 855,000 fish or 540,000 fish above Smsy.

Adoption of this proposal with the recommended modifications should not result in significant impacts to the Chignik River Sockeye Salmon late run when managed towards the lower half of the escapement goal range. The impacts of managing the late run towards the recommended modified upper end goal of 475,000 fish should result in increased subsistence opportunity.

Additionally, the Office of Subsistence Management seeks clarification of the intent of 5AA 15.357 (b)(3)(B) regarding the regulatory verbiage “*in addition to late-run sockeye salmon escapement needs.*” The current escapement schedule published by the Alaska Department of Fish and Game indicates the SEG is 200,000 to 400,000 late-run Sockeye Salmon and the inriver goal of 50,000 above the escapement needs has been added to the lower end of the SEG but not the upper end of the SEG. We seek clarification to determine if the inriver goal for subsistence purposes was established to direct fisheries managers to target at a minimum the lower end of the SEG plus the inriver goal (250,000 fish) or if the inriver goal was established to provide for additional subsistence opportunity during years when the upper end of the SEG is attained (450,000 fish).

Proposal 197 seeks to remove the prohibition of subsistence fishing 24 hours before, during, and 12 hours after a commercial salmon fishing period in the Alaska Peninsula Area.

Existing State Regulations:

5 AAC 01.410. Fishing seasons

- (a) In the Alaska Peninsula Area, salmon may be taken at any time, except*
 - (1) in those districts and sections open to commercial salmon fishing, salmon may not be taken during the 24 hours before and 12 hours following a commercial salmon fishing period;*

Existing Federal Regulations:

50 CFR 100.27 (e)(7)(iv) You may take salmon at any time, except in those districts and sections open to commercial salmon fishing where salmon may not be taken during the 24 hours before and 12 hours following each State open weekly commercial salmon fishing period, or as may be specified on a subsistence fishing permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations through April 1, 2016.

Impact to Federal subsistence users/fisheries: Yes. Eliminating the subsistence fisheries restrictions based on commercial fishery open and closed periods for commercial salmon fishing license holders and subsistence users in the Alaska Peninsula area will allow Federally qualified users to harvest fish during preferred weather, tide, vocational schedules, and other beneficial



conditions. Allowing subsistence users to harvest fish during times they select will allow users to subsistence fish during less inclement weather, preferred conditions for processing fish, potentially spread out subsistence user effort, and reduce competition for successful fishing sites.

~~**Federal Position/Recommended Action:**~~ The Office of Subsistence Management **supports** this proposal. Annual Sockeye Salmon abundance of the Alaska Peninsula watersheds as well as the commercial salmon harvests of stocks returning to these systems is exponentially larger than subsistence salmon harvests by Federally qualified users. Adoption of this proposal will likely not increase overall harvest by subsistence users but could potentially increase efficiency of harvesters, as well as reduce loss of harvest during processing due to spoilage and insects. If this proposal is adopted, a proposal could be submitted to the Federal Subsistence Board to realign State and Federal regulations to reduce regulatory complexity. Additionally, adoption of this proposal will reduce regulatory complexity as the new regulations would mirror the recent changes made to the Bristol Bay Area subsistence fisheries by the Board of Fisheries.



VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY



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

February 3, 2016

Alaska Board of Fisheries & Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RE: Proposal 203

Chairman Kluberton
Members of the Board of Fisheries;

The Valdez Fisheries Development Association Inc, submits this letter in support for Board of Fisheries Proposal 203.

VFDA operates the Solomon Gulch Hatchery in Valdez Alaska. The fisheries enhancement programs at our hatchery generate average annual returns of approximately 15 million Pink salmon for the commercial purse seine fisheries in Prince William Sound. In addition, VFDA's hatchery production provides for an annual return of 130,000 Coho salmon for the enjoyment of sport fishermen in Southcentral Alaska. It is estimated that these enhancement programs generate a combined \$80 million in economic output each year.

It is vital that hatchery operators, especially in years of low returns, be able to insure sufficient numbers of salmon are available to provide for the brood stock and cost recovery needs necessary for the continued success of their enhancement programs. If adopted, this proposal will provide for additional regulatory authority to effectively manage hatchery special harvest areas to achieve these goals.

For these reasons, VFDA strongly supports BOF Proposal 203 and encourages its adoption.

Sincerely

Mike H. Wells
Executive Director.