

The following comments were submitted as on-time comments and record copies to the February 2015 Southeast and Yakutat Finfish Meeting in regards to proposal 126-2014-2015

Petersburg Fish and Game Advisory Committee Minutes January 7, 2015 – truncated to only include comments on Proposal 126 (formerly AC 8)

Ryan Kapp (formerly PC 54.) PC 54 was essentially resubmitted under PC 14 submitted by Ryan Kapp for the 2016 Statewide Finfish meeting. The eight pages not included or modified from PC54 are added here.

Petersburg Vessel Owners Association (formerly PC 75)

Ryan Kapp (formerly RC 100)

Petersburg Advisory Committee Minutes

1/7/2015

Location: Assembly Chambers

Call to Order: by chairman Bob Martin at 6:30 pm.

Roll Call: 11 of 14 members present

AC members present:

AC Absent:

Bob Martin

Joel Randrup

Arnold Enge

Kirt Marsh

Ben Case

Wes Malcom

Jerry Dahl

Andy Knight

Stan Malcom

Frank Neidiffer

Ted Sandhofer

Max Worhatch

David Benitz

Ryan Littleton

ADF&G Present:

Joe Stratman, regional shellfish biologist

Troy Thynes, area management biologist for commercial finfish

Kevin Clark, assistant area management ... commercial fish

Patrick Fowler, area management biologist for sportfish

Visitors:

Megan O'Neil, Petersburg Vessel Owner's Association

John Jensen, Board of Fish

Mark Roberts, Alaska Troller's Association, local troller

Ed Wood, local troller and longliner

Main Agenda Item was to consider Southeast Finfish Proposals

New Business:

Elections: Bob Martin, Arnold Enge, and Stan Malcom were nominated to be re-elected for two year terms (expiring 12/2016) in their existing seats with the exception of Bob Martin's seat being relaxed from "crab" to an "undesignated" spot as there are usually several AC members holding crab permits in addition to their primary seat designation. There were no objections to the "undesignation" and no competing nominees. All three members were re-elected.

We discussed re-visiting some shrimp proposals we had punted to the Shrimp Task Force at our last meeting and decided to leave them alone. We agreed to re-visit #239 regarding a



					worms
Sitka Herring	123			na	
Sitka Herring	124			na	
Sitka Herring	125	0	11		Micromanaging department for no reason
Sitka Herring	126	0	11		Would cause devastating price drop to existing roe on kelp markets. Even 2014 showed drastic price drop.
Spawn on Kelp	127	0	11		Roe on kelp participants generally favor double-ponding to conserve herring. This proposal might discourage conservation in favor of product quality in low biomass years.
Spawn on Kelp	128	3	8		Might cause more fish to be used in fisheries during low biomass years Some members thought it could add value to product and that joining pens together could make adding herring less stressful on the fish being added to pens
Spawn on Kelp	129	9	2		Midnight is a bad time. Predators enter pens and destroy product. Minority said just stagger times and harvest earlier in day.
Dogfish	130			na	
Sablefish	131	0	11		Too vague but not bad idea, liked #134 better
Sablefish	132			na	
Sablefish	133			na	
Sablefish	134	11	0		Good for testing out the pot fishery to address flea and slime eel issues
Sablefish	135	10	0		Housekeeping to get ready for a pot fishery? - Fine
Sablefish	136	2	8		Not clear how many people could be on boat, whether permits required for non-participants Not sure there is a problem that needs to be addressed





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

RE: Support Documents for Proposal 126.

January 27, 2015

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



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ACKNOWLEDGEMENTS

Numerous people contributed to this project. Scott Walker conducted the aerial surveys and contributed advice and insight on the project. Craig Sempert provided logistical support in Craig. Many divers assisted in underwater kelp surveys, including Will Bergmann, Kyle Hebert, Robert Larson, Marc Pritchett, Michelle Ridgway, Jan Rumble, Craig Sempert, and Scott Walker. Denny Heimdahl and Helmer Olson supported the diver operations onboard the *R/V Sundance*. Nicole DuClos, Michelle Ridgway, and Karl Wolfe collected and measured kelp blades. Jan Rumble set up databases and entered data. Cori Cashen helped with formatting and map making, Pete Hagen contributed expertise on image analysis, and Dave Carlile provided statistical advice. Funding was provided by receipts from the 1999 Sitka Sound open platform herring roe-on-kelp test fishery.



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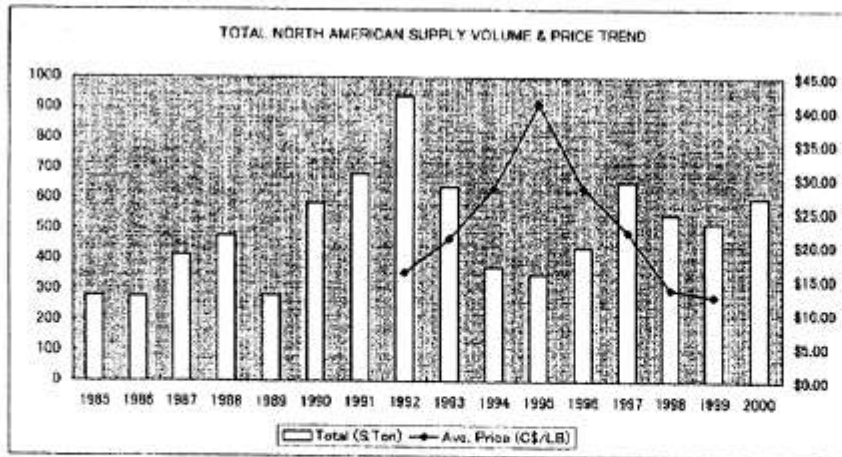
Graph 1 - TOTAL NORTH AMERICAN SUPPLY

NORTH AMERICAN SPAWN ON KELP PRODUCTION

	SF	B.C.	PWS	Hoonah	Craig	Norton	Sitka	TOTAL	Unit.	S.Ton
1985		208	71					279		
1986		157	120					277		F&G Data
1987		213	200					413		F&G Data
1988	20	234	221					475		F&G Data
1989	47	235	0					282		F&G Data
1990	107	247	219	12				585		F&G Data
1991	47	311	310	13				681		F&G Data
1992	84	308	495	23	26			936		F&G Data
1993	47	302	266	14	6			636		F&G Data
1994	35	289	0	33	17			374		F&G Data
1995	13	282	0	29	25			349		F&G Data
1996	107	294	0	0	37			438		F&G Data
1997	186	347	34	65	23			655		F&G Data
1998	36	357	12	86	22	8	27	548		F&G Data
1999	35	360	0	65	35		22	517		EWT estimate
2000	90	367	0	75	20		50	602		EWT estimate

PRICE RANGE for B.C. PRODUCT
C\$/LB

Low	Mid range	High
\$10.85	\$15.00	\$16.00
\$14.00	\$20.00	\$21.00
\$22.50	\$28.00	\$28.50
\$36.00	\$40.00	\$41.00
\$25.00	\$28.00	\$28.50
\$17.00	\$21.00	\$22.00
\$8.00	\$12.00	\$13.50
\$8.63	\$10.00	\$12.50



Elderwood Trading Co., Ltd.

9/13/2000

JHM-15-2000 16:51

ELDERWOOD TRADING CO LTD

504 4514542 P.06



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 February Southeast Finfish Proposals February 23-March 3, 2015

Petersburg Vessel Owners Association 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 crab, herring, salmon, shrimp, halibut, sablefish, and cod.

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 113: oppose

There is no biological reason to create a conservation area here. There are no endangered species in these waters that would be protected by it. There are many commercial and sport fisheries in and around this area currently. We don't want the commercial, sport, and personal use fishermen for sea cucumber, bottom fish, crab, shrimp, and salmon to lose this opportunity.

Proposal 114 and 115: oppose

Herring stocks are cyclical and this could prevent the herring sac row fishery from opening on seasons with sufficient return to support a fishery because past stocks were low. Herring return to spawn for up to seven years. These proposals could decrease the amount of management the department has over this fishery. We would like them to have the maximum amount of flexibility so they can best manage the fishery.

Proposal 116: support

When the returning biomass of herring exceeds the minimum threshold there needs to be a fishery. There are a lot of fishermen with major investments in this fishery and the current wording of the regulation leaves the possibility that the fishery wouldn't be opened.

Proposal 117: no position

Proposal 118: opposed



The goal of the herring sac roe fishery is to harvest the herring before they have spawned. The market on these herring is primarily for their eggs. Forcing the department to wait to open the fishery to the remaining 50% of the GHL until after 25nm of spawn would result in higher levels of spawned out fish being caught. This would greatly reduce the quality of the herring sent to the market. It is also likely that the GHL would not be caught every year under this management plan. Young herring spawn the latest and this proposal could create excessive fishing of the younger recruit stocks. Once again, we want the department to have more flexibility to manage the fishery than this proposal would allow for.

Proposal 119: support

This area was closed to allow for subsistence harvest of roe on branches. There has been very minimal effort from the subsistence users. In some years there has been no effort. There is a large amount of herring that returns to this area. This area should be open to commercial fishermen that would utilize it.

Proposal 121: oppose

There is already little to no subsistence use of district 13. There is no reason to expand this closed area. A lot of herring return to this area. Closing it to the commercial sector could hinder their ability to catch their full GHL. Also, it should be up to the department to manage and close areas when they deem it necessary.

Proposal 122: support

The GHL of this fishery was raised five years ago without science to support the decision. This decision also was not made by the department. There is no science to suggest that lowering it would harm the sustainability of the fishery.

Proposal 123 and 124: no position**Proposal 125: oppose**

There is no reason to reduce the GHL of this fishery to 10,000 or lower. The stocks can sustain a higher harvest rate and there are a lot of fishermen with large investments in this fishery. This would have a huge economic impact on our fishermen. In other herring fisheries it has always been up to the department to determine the minimum spawning biomass and manage the fishery from there. We don't support this proposal that would decrease the department's flexibility in managing the fishery.

Proposal 126: oppose

This has been a fishery in the past and created more product than the market could support. The product from these open pounds in this area was of lower quality than the product from closed pounds. It would adversely affect the current pound fisheries by introducing an influx of inferior product. None of our members that currently participate in the roe on kelp fisheries in other districts want to participate in this proposed district.

**Proposal 127: oppose**

The department manages the amount of herring taken in the pound fishery by managing how many structures are used. The management of the number of pound structures is done through the amount of blades allowed per permit by pen. The more permits fished in a single pen, the more blades allowed per permit. This would eliminate the department's current management plan. It would also encourage the use of more pounds and therefore increase the harvest of herring for this fishery. We believe this would result in more stress on the stock and decrease the sustainability of the fishery.

Proposal 129: no position**Proposal 130: no position****Proposals 134 and 135: support**

PVOA supports legalizing pots to fish sablefish quota. Whale depredation is a major issue in southeast Alaska. Our fishermen lose a large portion of their catch to whales feeding off their gear as they haul it. The amount of fish lost to these whales is not measurable for management purposes and it is wasted.

Sablefish pots would also reduce bycatch, including birds. Birds occasionally attack the bait on longline hook gear as it is being set and become snarled. Very small fish will be released through the mesh used on pots. Escape rings would allow non-directed species to swim out while the pot is on the bottom, avoiding the trauma of being hauled to the surface before being released. Small recruit stock sablefish would also escape this way with fewer traumas. Non-directed species that are too large to swim out of an escape ring would be spared the injury from biting a hook. Pot fishing would eliminate these issues.

When a hook and line set is lost the hooked fish suffer predation. Fish in a lost pot can potentially survive. Escape rings would allow small fish to leave the pot and survive. Larger sablefish and other species of fish could survive to leave the pots through a biodegradable panel. This would ensure fish in lost pots would not be wasted.

If this passes our fishermen would like there to be one season for both gear types rather than the two in place at this time. This is because almost all of our sablefish fishermen also target salmon. Two seasons could force them to choose between the sablefish and salmon fisheries and potentially have an economic impact on them.

Proposal 136: support

Fifty fish per household is a lot to harvest, care for, and consume in a year. We support this proposal and feel like it is in excess of what is actually taken for personal use.



Proposal 137: oppose

We have members with autobaiter systems that would like to be able to use their equipment to make a subsistence set. Since you cannot run both types of gear, our members with autobaiter gear don't have hand bait sets similar to what is being proposed. We would like them to be able to use the gear they currently own to be able to make subsistence set.

Proposal 138: support

We support requiring logbooks so that the department gets more information to better manage the fishery.

Proposal 139 and 140: no position

Proposal 141: support

We feel that trollers in the LAMP should be able to retain and enjoy two lingcod per trip. Under the current regulations it is hard for a troller near Sitka to keep a lingcod for personal use because they may have to cross through the LAMP or enter it to unload. Consequently, a lingcod kept outside the LAMP but on board at these times would be illegal.

Proposal 142: no position

Proposal 143: oppose

It is expensive to buy or build mechanisms that help release non-pelagic rockfish at depth. We don't feel personal use fishermen should have to be burdened with this investment. The current regulation requiring retention of non-pelagic rockfish ensures that the stocks are conserved and not over fished.

Proposal 144: oppose

We would like to see these rockfish retained rather than wasted. These non-pelagic rockfish cannot survive to return to the bottom after being pulled to the surface. The current required retention and bag limit prevents sport fishermen from releasing dead rockfish all day. It helps conserve the rockfish stocks so they do not become depleted.

Proposal 145: support

We support this proposal so that the department can have this as regulations instead of continuing to issue emergency orders on these areas every year.

Proposal 146: support

This would give the department a better feel for the amount of subsistence use coming out of districts 12 and 14. We want the department to get this information to help influence their management. The department published *Customary and Traditional Uses of salmon and Options for Revising Amounts Reasonably Necessary for Subsistence Uses of Salmon in Districts 12 and 14, Southeast Alaska* proposing six options for establishing a separate ANS for each



district. We support the department taking ten years to determine the subsistence harvest levels. We feel ten years is appropriate due to the cycle lengths of different salmon species. Pink salmon have a two year return while Chinook salmon have a five to six year cycle.

Proposal 147: oppose

This is already in effect. Passing this proposal would be redundant.

Proposal 156: no action**Proposal 157: oppose**

There is no reason to believe that chinook salmon are getting smaller. We want to see these salmon grow to legal size. Legalizing the taking of smaller Chinook salmon would increase the amount of king salmon eligible to be retained. This would affect the Pacific Salmon Treaty with Canada. Our cap could be reached sooner, increasing the amount of Chinook salmon that are caught, traumatized, and required to be released.

Proposal 173, 192, 193, 199, 200: oppose

Petersburg Vessel Owner's Association opposes these proposals that seek to reduce fishing opportunities that have traditionally been available to our fishermen. There is a very large fleet of seiners that participates in these areas proposed for closures at different times that have large investments in this fishery. Many fishermen have large boat, gear, and permit loans. Closing these waters could result in economic hardship to fishermen dependent on the salmon stocks.

These proposals would displace a lot of boats. Forcing the fleet out of such a large area would condense them to the remaining open waters. These areas may not be able to sustain the increased fishing efforts on their stocks. Icy Strait and Chatham Strait is a large corridor allowing fish to enter the inside waters of southeast from the ocean. Some years a major portion of the run arrives through this corridor.

There is no conservation issue in these areas. If there were it should be closed to everyone. Commercial fishermen are not taking fish away from the people of Angoon; they still get their personal use and subsistence fish. Our user groups truly are not in competition with each other.

The department has always done a really good job of managing the salmon stocks in these areas. They determined openings and closures in these areas in a way that prevents overfishing and conserves the stocks. They use tools such as test fisheries throughout Chatham Strait to influence their decisions. We feel it should continue to be up to the department to determine what areas are open to salmon fishing and when. They have the education, science, and experience to properly manage these salmon stocks. PVOA opposes these proposals that would reduce the department's flexibility to manage salmon.



Proposal 174: oppose

There are no conservation issues here and therefore no reason to reduce commercial fishing time in the area. If the department ever felt that overfishing could become a problem they have the ability to temporarily close this area through emergency order.

Proposal 175 and 176: oppose

We oppose these proposals because our organization is happy with the current *Enhanced Salmon Allocation Management Plan*. We do not see a need for regulatory change here.

Proposals 183, 186, 187, 190, 201, 207: support

Petersburg Vessel Owner's Association is in support of the proposals coming from Southeast Alaska Seiners and United Southeast Alaska Gillnetters. A lot of time, planning, and compromise went into these proposals and all our members are happy with them.

Proposals 182, 185, 225: Support

Our organization is in support of the proposals coming from the Joint Southeast Regional Planning Team. These proposals are presented to help the board address the sunsets occurring in 2014.

Proposal 188: oppose

This goes against the agreements between gear types in proposal 187.

Proposal 189: support

This proposal corrects an error. We support the department in correcting the regulations so that they match the management strategy currently in place regarding Hidden Falls.

Proposal 191: oppose

These issues are dealt with in proposal 190 which PVOA supports. We are therefore opposed to this proposal.

Proposal 194 and 195: oppose

This is not a conservation issue and therefore there is no reason to close these waters to anyone. Commercial fishermen are not taking fish away from the people of Pelican; they still get their personal use and subsistence fish. The department only opens this area when there is a surplus of fish to support a commercial fishery. There is no competition between the user groups in this area.

Proposal 196 and 197: oppose

It should be up to the department to set statistical areas. These are tools the department uses to define management areas and are the smallest level of a district. We need to leave setting



statistical areas up to the department so that they can implement their management plans best.

Proposal 201: oppose

PVOA is opposed to closing Basket Bay. This area is not usually open to purse seiners; however, we don't want to permanently lose the opportunity to fish there someday.

Proposal 202: oppose

Our membership feels that these regulations are clearly defined and don't need to be rewritten.

Proposal 204-205: oppose

Only the FAA can ground a plane. Planes would still fly during seine openings under the pretense of delivering parts. It is also not possible to ban communications between boats and planes. This proposal does not seem enforceable to us. Furthermore, we would like to point out that this has been proposed to the fish board in the past and failed.

Proposal 206: support

The new wording of the regulation eliminates the confusion between the lines of 15-C and 15-B.

Proposal 208: oppose

Reducing the mesh size will not reduce the number of kings caught in this area during non-king openings. It will increase the number of smaller kings caught. These are primarily hatchery kings returning to Anita Bay and do not count against the Pacific Salmon Treaty fish.

Proposal 209: no action

Proposal 210: support

This may lead to an increased pink salmon catch in both clear and muddy water because the net would be less visible to the salmon. These nets are already legal in both Cook Inlet and Puget Sound. They may also be more cost effective to our fishermen.

Proposal 224: no action

Proposal 227: oppose

This is contrary to the proposal we supported coming from the Joint Regional Planning Team. We support proposal 225, and therefore oppose 227.

Proposal 228: oppose

The proposed closure is during the peak of the season and would result in a huge loss of revenue to our trollers. We don't want our fishermen to lose this opportunity when there is no



conservation issue. Our trollers are not creating a competition for fish with the subsistence users. The department only opens commercial fisheries when there is an excess of stocks, after subsistence use, to support a fishery.

Proposal 230: oppose

We don't want to see district 15-c closed to troll beginning July 1. There is room for both gear groups to work together.

Thank you for your time and considering our comments. Petersburg Vessel Owner's Association had several long meeting to discuss these proposals and what we feel is best for the industry. Our organization will have representatives present at the meetings and we are happy to answer any questions.

Respectfully,

A handwritten signature in blue ink that reads "Megan O'Neil".

Megan O'Neil
Executive Director

RYAN KAPP RC100

MEMORANDUM

STATE OF ALASKA
COMMERCIAL FISHERIES ENTRY COMMISSION

TO: Alaska Board of Fisheries

DATE: January 12, 2000

Dan K. Coffey, Chairman
Ed Dersham
Larry J. Engel
Grant Miller
Russell Nelson
Virgil L. Umphenour
Dr. John R. White

PHONE: (907) 789-6160 VOICE
(907) 789-6170 FAX



FROM: Commercial Fisheries
Entry Commission

SUBJECT: Board Proposals 168, 175 and 174—
Optional Open Pounding
Alternative for the Southeast Roe
Herring Seine Fishery (Sitka Sound)

Marlene Johnson, Commissioner
Mary McDowell, Commissioner
Bruce Twomley, Chairman

Board Proposals 168 and 175 would authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery. Board Proposal 174 opposes the change.

The Board previously considered this issue in January of 1997 (Proposal 441). Our comments at the time (coordinated with those of the Department of Law) remain current today. This memo is a recap:

Since our 1997 communications, (1) the Department has experienced managing the experimental, Sitka Sound open pound fishery authorized by the Board in 1997; and (2) the Board authorized a herring pound spawn-on-kelp alternative for Norton Sound herring limited entry permit holders (both gillnet and beach seine). 5 AAC 27.965.

If the Board were to act favorably on Proposals 168 and 175, the Board should be very clear its action affects only the existing, limited Sitka Sound roe herring purse seine fishery.

In turn, following favorable Board action on Proposals 168 and 175, CFEC would stand ready to propose complimentary changes to its regulations. To adopt such regulations after a public comment period, CFEC would be required to determine independently that the purposes of the Limited Entry Act would be served by doing so.

In particular, CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted. Compare 20 AAC .230(a) and 5 AAC 33.200(m)(2). CFEC would likely propose

modification of its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area included within the Board's definition of the Sitka Sound roe herring purse seine fishery.

In making and considering this proposal, CFEC would be guided by the Limited Entry Act, AS 16.43.200, which reads in relevant part as follows:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative areas reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

* * *

The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

Generally, the Entry Commission would also be guided by AS 16.43.950, which, in relevant part, provides:

Nothing in [the Limited Entry Act] limits the powers of the Board of Fisheries, including the power to determine legal types of gear and the power to establish size limitations or other uniform restrictions applying to a certain type of gear. Holders of interim-use permits or entry permits issued under this chapter are subject to all regulations adopted by the Board of Fisheries.

Our regulatory procedure would allow us to meet our responsibility under the Limited Entry Act, and, additionally, help generate public awareness and comment (particularly from members of the public who believe they have interests under the limited entry system that should be addressed). Our procedure creates an opportunity for the commission to clarify potential ambiguity between regulations of the Board and of the commission. The commission must reserve judgment on the issue until it has received public comment.

Bruce Twomley plans to report to the Board on Saturday, January 15, 2000.

If the Board has additional questions during the following Board meetings, at least one of the following individuals will be available by phone at 789-6160: Bruce Twomley, Susan Haymes, or Kurt Schelle.

cc: Frank Rue, Commissioner, ADF&G
Doug Mecum, Director of Commercial Fisheries
Scott Marshall, Regional Supervisor
Diana Cote, Executive Director, Board of Fisheries
Stephen White, Assistant Attorney General