

September 8, 2016

Chairman John Jensen, Alaska Board of Fisheries  
ADF&G Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
(907) 465-6094 FAX  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Re: Aleutians East Borough strongly opposed to Agenda Change Request #4

Dear Chairman Jensen,

This letter is to state the Aleutians East Borough's strong opposition to ACR #4, slated for consideration at the October 2016 Work Session. We believe this ACR is misguided and the conservation purpose as stated in the ACR, '*Limiting commercial harvest of Chinook in this fishery to its historic levels will contribute to the sustainable Chinook runs in the AYK and Norton Sound Areas*', is flawed. The science and data show that this is a non-issue, plus this subject has already been addressed by the Board twice this year. We respectfully request that you *not* accept ACR #4.

The ACR suggests reducing commercial Chinook salmon harvest to historic levels. Actually, recent June harvests of Chinook, with the exception of the anomalous lightning strike in 2015, are *below* historic levels. This includes the June South Unimak & Shumagins harvest of **3843** Chinook for 2016.<sup>1</sup> We calculated average June Chinook harvests in South Unimak and the Shumagin Islands from several sample range of years using ADFG data.<sup>2</sup> The average June Chinook harvest for the South Unimak & Shumagin Islands areas for years 1975 – 2014 was **4247** Chinook; for years 1975 – 1990, **4228** Chinook; for years 1980 – 2014, **4729** Chinook; for years 1980 – 1990, **5754** Chinook; and for years 1990 – 2014 the average was **4503** Chinook. The recent range of years 2000 through 2014, average of **3187** Chinook, is less than the other historic levels since 1975. In the same document, a table<sup>3</sup> including the South Alaska Peninsula Chinook harvest dating back to 1908 ranks 2005 to 2014 as the second lowest average overall Chinook harvest range of years for the area.

In addition, the recent Gulf of Alaska Chinook salmon genetic study from NMFS, Genetic Stock Composition Analysis of the Chinook Salmon Bycatch Samples from the 2014 Gulf of Alaska Trawl

<sup>1</sup> ADFG Inseason Commercial Harvest Estimates

<http://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaakpeninsula.salmonharvestsummary>

<sup>2</sup> South Alaska Peninsula Salmon Annual Management Report, 2015 (FMR No. 16-02) Appendix B3 on page 60

<http://www.adfg.alaska.gov/FedAidPDFs/FMR16-02.pdf>

<sup>3</sup> South Alaska Peninsula Salmon Annual Management Report, 2015 (FMR No. 16-02) Appendix A10, pages 23-25

<http://www.adfg.alaska.gov/FedAidPDFs/FMR16-02.pdf>



Fishery<sup>4</sup>, shows that 99% of the Chinook salmon caught as bycatch in other Gulf of Alaska fisheries are not bound for the Yukon, Kuskokwim, Norton Sound or the Arctic, but instead the majority are bound for the West Coast and Pacific Northwest. This would indicate that reducing fishing time in the June South Unimak and Shumagin Islands salmon fishery would not benefit Chinook runs in Western Alaska.

The South Unimak & Shumagin Island June Salmon fishery is a healthy, vibrant and sustainable fishery, critical to the local economy in the communities of False Pass, King Cove and Sand Point. Fishermen, shore-based processors and many support businesses depend on the June season, documented as a commercial fishery in the area for over 100 years, and sustaining the native people for thousands of years. The adoption of ACR #4 could have severe regional economic impacts.

The Alaska Board of Fisheries has twice addressed virtually this same issue, brought forward by the same petitioner, first as Proposal 184 in February 2016, then as an emergency petition at your March 2016 meeting. We urge you to finally put this issue to rest by showing unanimous opposition to this ACR #4 that is controverted by the science and data.

Thank you for your consideration and the opportunity to comment.

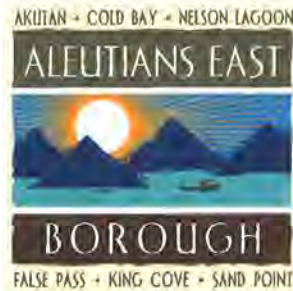
Sincerely,

A handwritten signature in blue ink, appearing to read "Ernie Weiss", followed by a horizontal line.

Ernie Weiss  
Natural Resources Director  
Aleutians East Borough

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<sup>4</sup> NOAA Technical Memorandum NMFS-AFSC-311, <http://www.afsc.noaa.gov/Publications/AFSC-TM/NOAA-TM-AFSC-311.pdf>



September 9, 2016

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Re: Aleutians East Borough Assembly Resolution 17-03, Requesting the Alaska Board of Fisheries Accommodate Western Gulf of Alaska Fishermen by Adjusting the Board's Meeting Cycle Schedule

Dear Chairman Jensen,

This week the Aleutians East Borough Assembly passed the attached Resolution 17-03 by a unanimous vote supporting a change to the Board of Fisheries meeting cycle organization. This office has been advocating a change to the meeting cycle for several years<sup>1</sup> to accommodate our active fishermen who also wish to participate in the Board of Fisheries public process. We were very pleased to hear former Chair Kluberton during public testimony at the February Board meeting, express an interest by some Board members to consider the issue this year. Executive Director Haight confirmed that the October Work Session is the appropriate time to bring the issue forward again.

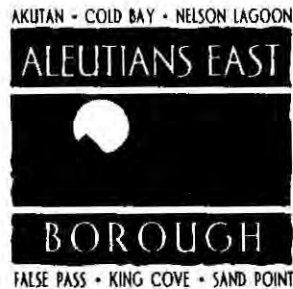
The main problem for Alaska Peninsula fishermen is that the Area M finfish meeting is currently scheduled every 3 years in February, right at the height of the most important Pacific cod season. Even though P. cod issues have been addressed at a separate fall meeting for the last few cycles, the majority of our P. cod fishermen also fish for salmon in the summer. Thus, the timing of the Area M meeting currently forces many of our fishermen to choose between making a living, or participating in the Board public process.

The attached resolution requests the Board to address ALL Alaska Peninsula finfish issues, including cod and salmon, at a December meeting, a time of year supported by many local fishermen. Thank you for the opportunity to comment and for considering this cycle organization change request.

Sincerely,

Ernie Weiss  
Natural Resources Director

<sup>1</sup> ACR #15 for the October 2012 Board Work Session; RC #20 for the October 2015 Board Work Session.



## RESOLUTION 17-03

### **A RESOLUTION OF THE ALEUTIANS EAST BOROUGH ASSEMBLY REQUESTING THE ALASKA BOARD OF FISHERIES ACCOMMODATE WESTERN GULF OF ALASKA FISHERMEN BY ADJUSTING THE BOARD'S MEETING CYCLE SCHEDULE**

**WHEREAS**, the Alaska Board of Fisheries has held the Alaska Peninsula Finfish meeting beginning in February, on a rotating basis within the three-meeting cycle, for many years; and

**WHEREAS**, since 2011 the Board has removed Pacific cod issues from the regular Alaska Peninsula finfish February meeting and discussed cod issues in a separate meeting held in October or November; and

**WHEREAS**, February and March are critical months for the South Peninsula Pacific cod fishermen; and

**WHEREAS**, most South Peninsula Pacific cod fishermen also participate in the Alaska Peninsula salmon fisheries; and

**WHEREAS**, discussing Alaska Peninsula area salmon or other finfish at Board of Fish meetings in February or March serves to disenfranchise local Pacific cod fishermen from participating in the Board's public process regarding salmon issues; and

**WHEREAS**, the Borough, through the Natural Resources Department, has previously submitted comment letters and provided public testimony to the Board regarding the problem of holding the Alaska Peninsula finfish meeting in February; and

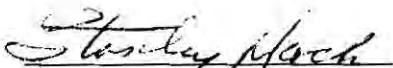
**WHEREAS**, local fishermen have suggested that a December Alaska Board of Fisheries meeting would be the most convenient time to discuss all Alaska Peninsula finfish matters including cod and salmon.

**NOW THEREFORE BE IT RESOLVED** that the Aleutians East Borough Assembly respectfully requests the Alaska Board of Fisheries adjust their Three Meeting Cycle Organization to accommodate the needs of Alaska Peninsula Pacific cod and salmon fishermen; and

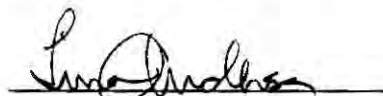


**BE IT FURTHER RESOLVED** the Assembly requests the Board consider the month December for future meetings to discuss all Alaska Peninsula finfish issues for the benefit of local fishermen and the fishery resource.

**PASSED AND APPROVED** by the Aleutians East Borough on this 7th day of September 2016.

  
Stanley Mack, Mayor

ATTEST:

  
Tina Anderson, Clerk



September 13, 2016

Chairman John Jensen, Alaska Board of Fisheries  
ADF&G Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Re: Requesting the Alaska Board of Fish Accommodate Western Gulf Fishermen by  
Adjusting the Board's Meeting Cycle Schedule

Dear Chairman Jensen,

The City of Sand Point requests a change to the Board of Fisheries meeting cycle organization. The Aleutians East Borough (AEB) - and the communities within, including Sand Point and King Cove - has for a number of years asked the Board to consider a meeting change to accommodate the active Western Gulf fishermen that would like to participate in the public process.

The AEB's recent Assembly Resolution 17-03 encapsulates the real rub for our area, which is that Alaska Peninsula fishermen who fish for Pacific cod are at the height of that particular season when the Area M finfish meeting occurs every 3 years in February. The majority of our P cod fishermen also salmon fish in the summers. Thus, the timing of the finfish meeting forces many fisherman to choose between being out on the water to make a living or participating in a hotel for the Board's public process.

Instead, Alaska Peninsula fishermen would rather the Board consider addressing all regional finfish issues, including cod and salmon, at a December meeting, a more convenient time of year for many local fishermen. We hope this change could lead to more active participation at the Board level from our local fleet.

Thank you for the opportunity to comment and for considering this meeting cycle request.

Sincerely,

Glen Gardner, Jr

Mayor



**Board of Fish and Game**

**Boards support section**

**PO box 115526**

**Juneau Alaska, 99811**

To the board of fish and game:

Cc: Clarence Sable Fish Coalition:

My name is Bill Connor, I am a member of the Clarence Sable Fish Coalition, I have made a request with an ARC, to extend the longline season and also to allow the longline permit holders the option to use pots to harvest their EQS.

I am asking for your support on the ACR submitted by me on behalf of the Clarence Sable Fish Coalition.

**Beginning Sept 25<sup>th</sup> to November 15<sup>th</sup> (the closing date by existing regulation) to allow longline permit holders the option to use pot gear and reopen the season for long line gear.**

We believe this ACR falls under an unexpected event, **ever increasing killer whale interaction and predation on longlines causing excess unaccounted for sablefish removals, and for conservation, the reduction of bycatch.**

Currently NPFMC is also working hard on measures to reduce bycatch in the gulf as we should here in state waters.

Here a few reasons to allow the use of pots and to extend the longline season.

AS times change so do fisheries, and to conduct them without change is going forward blindly.

Pre 1960 whaling was a legal business. The whale population was disappearing. Since late 1960 these populations have exploded. With this explosion, these mammals have overpopulated and are becoming opportunist feeders, quite like protected park bears.

We have the tools to adjust to these changes and we **must** to keep Alaska fisheries sustainable.

The Clarence Sable Fish Fishery is now being beaten down by the removal of 85% of the allowable quota in 75 days when it could be spread out over a much longer season. It is disappearing in massive amounts by the whales predation on the longline fisherman causing unaccounted for removals of sable fish affecting the biomass. This could be remedied by pots.

If we allow these changes we will reduce bycatch considerably by lengthening the longline season and by allowing pots. WE would be adjusting to our **environmental** change. This would be a conservation move for our fishery.

By lengthening the season it allows us to fish on different stocks as they move through the fishing grounds. Not just the one that is present June and July and half of August.



I have included statistical information that was provided by the STATE OF ALASKA FISH AND GAME GROUND FISH DEPARTMENT (which I requested.)

Questions:

1. How many pounds of bycatch (by species) were caught each year from 2006-2015 in the SSEI pot fishery?
2. Why are halibut not included in the bycatch numbers?
3. How much bycatch of each species were caught each year from 2006-2016 on the SSEI LL survey?
4. How many times has the state survey vessel had whale predation 2006-2016?
5. For the SSEI LL fishery: how many pounds of by catch are caught each year? I would note that the states bycatch is quite significant to the total pounds caught each year, as well as my by catch noted on my fish tickets. So I question if the bycatch numbers are not a bit low over all, since my fish tickets represent 15% of the total, and the total bycatch if you include halibut is quite significant. But not so with pot gear.
6. For the SSEI LL fishery: what is the AHO and EQS for the fishery each year and what is the bycatch percentage to Sablefish?
7. How many skates of gear were hauled each year to reach the quota?
8. How many pots were hauled each year to reach their quota?

Thank you in advance for taking the time to read and discuss this letter with the other members

Bill Connor

Member of the Clarence Sable Fish Coalition





Pot info → 1. How many pounds of bycatch (by species) were caught each year from 2006 to 2015 in the SSEI pot fishery?

The only bycatch reported was 14 pounds of Thornyhead in 2007.

2. Why are halibut not included in the bycatch numbers we provided for the SSEI LL bycatch?

SSEI	Year	Sum of HALIBUT
	2006	2,228
	2007	10,830
	2008	45,447
	2009	64,881
	2010	50,257
	2011	50,362
	2012	56,250
	2013	33,254
	2014	22,116
	2015	22,890
	2016	3,666

In the gulf trawl rationalizing, halibut is a big issue.

These are big numbers if it is realized the Clarence quota is only around 550,000 lbs. This number could go way down with pot gear.

# State survey vessel bycatch



## 3. How much bycatch of each species were caught each year from 2006 to 2016 on the SSEI LL survey?

Sum of Number Fish Caught Species	Year										
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Arrowtooth flounder	196	134	213	313	294	270	245	145	147	148	118
Bullhead sculpin		2									
Coral	10	12	6	5	9	11	2	3	13	4	16
Dover sole	6	29	19	10	13	6	15	63	44	40	36
Flatfish, deep water		1									
General groundfish		0	0	0	2		12	6		2	
General shark					1						
Golden king crab		3			1						
Grenadier (rattail)					3						
Halibut	467	586	558	748	616	424	834	728	1,433	1,378	789
Lingcod greenling	2			1			1		4		
Octopus		1		1					1		
Pacific cod	92	115	67	59	142	82	137	52	152	290	143
Pacific hagfish	606	588	648	602	531	337	561	344	327	1,087	39
Pacific hake		1									
Pacific sleeper shark	6	12	3	3	2	2	4				1
Pollock, walleye	2	2		2	1	1	2	2	5	7	12
Ratfish	110	171	172	87	192	99	189	205	121	104	54
Redbanded rockfish	13	23	25	39	43	26	37	40	30	47	72
Rougeye rockfish	44	71	79	16	45	22	47	20	56	73	80
Sablefish	8,405	8,001	7,613	6,278	6,053	8,031	9,539	5,575	5,780	4,335	6,030
Shortraker rockfish	37	130	149	107	100	29	69	37	41	122	143
Skate, big					1		2				
Skate, general	215	287	320	253	361	179	466	275	291	429	171
Skate, long nose	417	392	539	631	606	276	627	345	472	390	200
Spiny dogfish shark	973	1,273	175	1,126	695	417	632	177	297	223	404
Thornyhead rockfish	441	465	558	721	774	753	503	535	571	629	418
Unspecified slope rockfish		1									
Waste fish				1							
Yellowtail rockfish			1				1		1		
<b>Grand Total</b>	<b>12,042</b>	<b>12,300</b>	<b>11,145</b>	<b>11,003</b>	<b>10,485</b>	<b>10,965</b>	<b>13,925</b>	<b>8,552</b>	<b>9,786</b>	<b>9,308</b>	<b>8,726</b>

This is for two vessels

# Commercial vessel Bycatch for 20 vessels

4. For the SSEI LL fishery; How many pounds of bycatch are caught each year?



Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Grand Total
Sablefish	537,812	533,129	531,866	525,534	488,449	472,070	445,678	429,259	425,395	442,123	347,502	5,178,818
Arrow fldr											150	150
Black rf								19				19
Longnose skate										2,275		2,275
P. cod	1,827	1,150	561	2,742	2,332	4,593	10,237	5,454	8,171	11,471	4,910	53,450
Quillback rf	4	142	96				8	23	88			361
Redbanded rf	2,654	4,177	6,347	4,752	4,555	3,610	5,519	2,710	3,273	2,832	3,543	43,972
Rougheye rf	7,021	9,269	9,576	8,987	9,119	13,609	5,831	2,102	8,767	6,440	4,020	84,742
Shortraker rf	14,604	19,477	31,366	26,446	29,952	12,974	18,893	22,744	20,250	13,840	12,020	222,563
Silvergray rf	14		4	6		5					7	36
Skate									4,694		2,053	6,747
Spiny dogfish											300	300
Tiger rf										2		2
Thornyhead rf	22,086	23,593	27,845	29,385	32,789	23,985	26,044	22,383	22,220	23,778	20,656	274,763
Yelloweye rf		256	441		66			10	41			814
<b>Reported Total bycatch</b>	48,210	58,063	76,236	72,318	78,814	58,776	66,532	55,445	67,503	60,638	47,659	690,194

My total Bycatch for 2016 = 5366 or 11%  
There are 19 other permits - are Bycatch numbers good

# Longline Bycatch

PC 04  
6 of 14



by Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
<b>Bycatch % of Sablefish</b>	9.00%	10.90%	14.30%	13.80%	16.10%	12.50%	14.90%	12.90%	15.90%	13.70%	13.70%
Arrow fldr	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Black rf	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Longnose skate	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.50%	0%
P. cod	0.30%	0.20%	0.10%	0.50%	0.50%	1.00%	2.30%	1.30%	1.90%	2.60%	1.40%
Quillback rf	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Redbanded rf	0.50%	0.80%	1.20%	0.90%	0.90%	0.80%	1.20%	0.60%	0.80%	0.60%	1.00%
Rougheye rf	1.30%	1.70%	1.80%	1.70%	1.90%	2.90%	1.30%	0.50%	2.10%	1.50%	1.20%
Shortraker rf	2.70%	3.70%	5.90%	5.00%	6.10%	2.70%	4.20%	5.30%	4.80%	3.10%	3.50%
Silvergray rf	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Skate	0%	0%	0%	0%	0%	0%	0%	0%	1.10%	0%	0.60%
Spiny dogfish	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.10%
Tiger rf	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Thornyhead rf	4.10%	4.40%	5.20%	5.60%	6.70%	5.10%	5.80%	5.20%	5.20%	5.40%	5.90%
Yelloweye rf	0%	0%	0.10%	0%	0%	0%	0%	0%	0%	0%	0%

The bycatch is pretty High, Longline vense pots!



1. For our LL survey in Clarence; how many times have we had whale predation? I would assume this would be the number of sets that had whale predation.  
Orca whales were noted during hauling in the set comments for 2006, 2010, 2014, and 2016. Depredation was explicitly noted in 2010, 2014, and 2016. In 2010 seven sets had signs of whale depredation, 2014 had two sets, and 2016 had four sets including one set which was not fished due to orca predation on previous sets.
2. For the SSEI LL fishery; How many units of gear (i.e. skates) were hauled each year to reach the quota?  
Skate gear configuration varies quite a bit so total hooks provides a better reflection of actual effort.

Year	Sum of HOOKS
2005	898,935
2006	829,644
2007	892,962
2008	1,185,497
2009	1,411,049
2010	1,221,135
2011	991,683
2012	1,267,827
2013	1,167,060
2014	1,237,947
2015	1,110,279
2016(preliminary)	651,020

Note: as quota falls and whale predation is more common the number of hooks to catch the lower sablefish quota increases



3. For the SSEI pot fishery; How many units of pot gear were hauled each year to reach the quota?

Year	Sum of NUMBER OF POTS
2005	3,125
2006	2,408
2007	2,325
2008	4,674
2009	3,707
2010	2,678
2011	1,376
2012	1,066
2013	1,872
2014	1,638
2015	1,846
2016	No data

Pot, By catch reported by the state was only for 2007  
and only 14 pounds.



6. For the SSEI LL fishery; What is the AHO and EQS for the fishery for each year?

			Longline Fishery	Pot Fishery
			No. of permits	No. of permits
Year	Annual harvest objective	Equal share quota		
2005	696,000	24,860	24	4
2006	696,000	21,750	28	4
2007	696,000	21,750	28	4
2008	696,000	21,750	28	4
2009	634,000	22,650	25	3
2010	634,000	23,400	24	3
2011	583,280	23,300	22	3
2012	583,280	25,360	20	3
2013	583,280	25,360	20	3
2014	536,618	23,331	20	3
2015	536,618	23,331	20	3
2016	482,956	20,998	20	3

Will whale predation help the quota to fall even further?



5. For the SSEI LL fishery; What percent of the quota is not reached each year?

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
HQ longline only	609,000	609,000	609,000	566,100	561,600	512,600	507,200	507,200	466,625	466,625	419,962
EQS	21,750	21,750	21,750	22,650	23,400	23,300	25,360	25,360	23,331	23,331	20,998
5% annual allowable overage/underage	1,088	1,088	1,088	1,133	1,170	1,165	1,268	1,268	1,167	1,167	1,050

<b>Total legal harvest/PQS</b>	<b>534,836</b>	<b>529,986</b>	<b>530,218</b>	<b>521,428</b>	<b>486,632</b>	<b>469,906</b>	<b>443,432</b>	<b>426,959</b>	<b>425,395</b>	<b>441,322</b>	<b>412,509</b>
Overages above PQS's	3,535	4,327	2,352	6,070	2,976	2,354	2,434	2,959	0	1,125	285

Total unfished PQS pounds	74,164	79,014	78,782	44,672	74,968	42,694	65,316	87,743	51,067	38,957	15,472
Unfished PQS %	12%	13%	13%	8%	13%	8%	13%	17%	11%	8%	4%
Total remaining AHO minus unfished permits	30,664	13,764	35,282	22,022	51,568	19,394	39,956	62,383	27,736	15,626	15,472
Permits not fished	2	3	2	1	1	1	1	1	1	1	0
Unfished permit poundage	43,500	65,250	43,500	22,650	23,400	23,300	25,360	25,360	23,331	23,331	0
unfished permits %	7%	11%	7%	4%	4%	5%	5%	5%	5%	5%	0%
Percent of Quota unfished excluding inactive permits %	5%	2%	6%	4%	9%	4%	8%	12%	6%	3%	4%

Unfished pounds that can't be transferred to following year PQS's (excluding inactive permits)											
	7,003	55,020	13,175	8,021	5,833						
	1%	11%	3%	2%	1%						

→ not convinced all data is in. as noted on another question.





# ALASKA DEPARTMENT OF FISH & GAME ELECTRONIC GROUND FISH TICKET

DO NOT WRITE IN THIS SPACE

## E16 521071

SELLER

Statistical Area WorkSheet			
Stat. Area	%	Stat. Area	%
315432 STATE 659	100		

**Vessel** OBSESSION  
**ADF&G NO.** 35553  
**Permit** C61C 691990 1601A  
 CONNOR WILLIAM  
 HJ

**Crew Size** 5 **Mgmt Pgm** SMS  
**Observers onboard** 0 **ID**

**Port of Landing or off-shore operation type**  
 KTN Ketchikan  
**Type of Gear used**  
 61 Longline (hook and line)

✓ **Mag Stripe Read**

**Owner:** F1546 Trident Ketchikan Cannery  
**Date Fishing Began (Gear in Water)** 06/12/2016

**Custom Processor:**  
**Days Fished** 6  
**Date Landed** 06/17/2016

**Buying Station:** KETCHIKAN DOCK

**PARTIAL DELIVERY:**  
 Partial Delivery  
 Dock Delivery  
 Last Landing for Trip  
 Multiple IFQ Permits

SPECIES	STAT AREA	DEL. COND	SCALE WEIGHT	NUM	DISP.	SIZE & GRADE	SOLD WEIGHT	PRICE	AMOUNT
710 Sablefish		01 Whole	10,811		60 Sold				
152 Shortraker rf		01 Whole	862		60 Sold				
143 Thornyhead rf		01 Whole	674		60 Sold				
153 Redbanded rf		01 Whole	198		60 Sold				
110 P. cod		01 Whole	493		60 Sold				
151 Rougheye rf		01 Whole	355		62 Overage				
19 - Forfeited catch - bycatch overage - State Managed Groundfish									
152 Shortraker rf		01 Whole	34		62 Overage				
19 - Forfeited catch - bycatch overage - State Managed Groundfish									

**Total:** 0 \$0.00

I HEREBY ATTEST THAT THESE FISH WERE CAUGHT IN COMPLIANCE WITH ADF&G REGULATIONS.

Permit Holder's Signature

Fish Received by

Date

9/17/16

Taxes	Rate	Amount
Landings Tax		
AFA Fee		
Other		
<b>Total</b>		

**Landing Report ID: 2999092** CFEC Serial Number: 457024

Other Fish Tickets: E16 521070

P. cod Round Weight: 493  
 Thornyhead rf Round Weight: 674  
 Rougheye rf Round Weight: 355  
 Shortraker rf Round Weight: 896  
 Redbanded rf Round Weight: 198  
 Sablefish Round Weight: 10,811

2016 1st Delivery  
 Total bycatch  
 2619 lbs

Observer only	
Total Round Weight: 13,427	
ODDS Trip Number:	
ADFG only	
Logbook	
Observer	
Interview	

In 2016 I fell short of my EQS 1,627 Pounds or 8% because of killer whales



# ALASKA DEPARTMENT OF FISH & GAME ELECTRONIC GROUND FISH TICKET

DO NOT WRITE IN THIS SPACE  
**E16 568791**

SELLER

Statistical Area WorkSheet			
Stat. Area	%	Stat. Area	%
315502 STATE 659	15	325531 STATE 659	70
325533 STATE 659	15		

**Vessel** OBSESSION  
**ADF&G NO.** 35553  
**Permit** C61C 691990 1601A  
**CONNOR WILLIAM**  
**HJ**

**Crew Size** 5 **Mgmt Pgm** SMS  
**Observers onboard** 0 **ID**

**Port of Landing or off-shore operation type**  
 KTN Ketchikan  
**Type of Gear used**  
 61 Longline (hook and line)

✓ **Mag Stripe Read**

**Owner:** F1546 Trident Ketchikan Cannery

**Date Fishing Began (Gear in Water)** 06/18/2016

**Custom Processor:**

**Days Fished** 4  
**Date Landed** 06/22/2016

**Buying Station:** KETCHIKAN DOCK

**PARTIAL DELIVERY:**  
 Partial Delivery  
 Dock Delivery  
 Last Landing for Trip  
 Multiple IFQ Permits

SPECIES	STAT AREA	DEL. COND	SCALE WEIGHT	NUM	DISP.	SIZE & GRADE	SOLD WEIGHT	PRICE	AMOUNT
710 Sablefish		01 Whole	8,560		60 Sold				
151 Rougheye rf		01 Whole	599		60 Sold				
143 Thornyhead rf		01 Whole	433		60 Sold				
153 Redbanded rf		01 Whole	158		60 Sold				
151 Rougheye rf		01 Whole	89		62 Overage				
19 - Forfeited catch - bycatch overage - State Managed Groundfish									
152 Shortraker rf		01 Whole	994		62 Overage				
19 - Forfeited catch - bycatch overage - State Managed Groundfish									
<b>Total:</b>								0	\$0.00

I HEREBY ATTEST THAT THESE FISH WERE CAUGHT IN COMPLIANCE WITH ADF&G REGULATIONS.

Permit Holder's Signature \_\_\_\_\_

Taxes	Rate	Amount
Landings Tax		
AFA Fee		
Other		
<b>Total</b>		

Fish Received by  Date 6/22/16

**Landing Report ID:** 3048245 **CFEC Serial Number:** 457024  
 Thornyhead rf Round Weight: 433  
 Rougheye rf Round Weight: 688  
 Shortraker rf Round Weight: 994  
 Redbanded rf Round Weight: 158  
 Sablefish Round Weight: 8,560

2016 2ND Delivery  
 Total Bycatch  
 2,273 lbs

Observer only	
Total Round Weight:	10,833
ODDS Trip Number:	
ADFG only	
Logbook	
Observer	
Interview	



**Board of Fish and Game**

**Boards support section**

**PO box 115526**

**Juneau Alaska, 99811**

To the board of fish and game:

Cc: Clarence Sable Fish Coalition:

My name is Bill Connor, I am a member of the Clarence Sable Fish Coalition, I have made a request with an ARC, to extend the longline season and also to allow the longline permit holders the option to use pots to harvest their EQS.

I am asking for your support on the ACR submitted by me on behalf of the Clarence Sable Fish Coalition.

**Beginning Sept 25<sup>th</sup> to November 15<sup>th</sup> (the closing date by existing regulation) to allow longline permit holders the option to use pot gear and reopen the season for long line gear.**

We believe this ACR falls under an unexpected event, **ever increasing killer whale interaction and predation on longlines causing excess unaccounted for sablefish removals, and for conservation, the reduction of bycatch.**

Currently NPFMC is also working hard on measures to reduce bycatch in the gulf as we should here in state waters.

Here a few reasons to allow the use of pots and to extend the longline season.

AS times change so do fisheries, and to conduct them without change is going forward blindly.

Pre 1960 whaling was a legal business. The whale population was disappearing. Since late 1960 these populations have exploded. With this explosion, these mammals have overpopulated and are becoming opportunist feeders, quite like protected park bears.

We have the tools to adjust to these changes and we **must** to keep Alaska fisheries sustainable.

The Clarence Sable Fish Fishery is now being beaten down by the removal of 85% of the allowable quota in 75 days when it could be spread out over a much longer season. It is disappearing in massive amounts by the whales predation on the longline fisherman causing unaccounted for removals of sable fish affecting the biomass. This could be remedied by pots.

If we allow these changes we will reduce bycatch considerably by lengthening the longline season and by allowing pots. WE would be adjusting to our **environmental** change. This would be a conservation move for our fishery.

By lengthening the season it allows us to fish on different stocks as they move through the fishing grounds. Not just the one that is present June and July and half of August.



I have included statistical information that was provided by the STATE OF ALASKA FISH AND GAME GROUND FISH DEPARTMENT (which I requested.)

Questions:

1. How many pounds of bycatch (by species) were caught each year from 2006-2015 in the SSEI pot fishery?
2. Why are halibut not included in the bycatch numbers?
3. How much bycatch of each species were caught each year from 2006-2016 on the SSEI LL survey?
4. How many times has the state survey vessel had whale predation 2006-2016?
5. For the SSEI LL fishery: how many pounds of by catch are caught each year? I would note that the states bycatch is quite significant to the total pounds caught each year, as well as my by catch noted on my fish tickets. So I question if the bycatch numbers are not a bit low over all, since my fish tickets represent 15% of the total, and the total bycatch if you include halibut is quite significant. But not so with pot gear.
6. For the SSEI LL fishery: what is the AHO and EQS for the fishery each year and what is the bycatch percentage to Sablefish?
7. How many skates of gear were hauled each year to reach the quota?
8. How many pots were hauled each year to reach their quota?

Thank you in advance for taking the time to read and discuss this letter with the other members

Bill Connor

Member of the Clarence Sable Fish Coalition



Submitted By  
Linda Kozak  
Submitted On  
9/20/2016 11:01:31 AM  
Affiliation  
Crab Observer Oversight Task Force

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907-486-8824  
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[lkozak@gci.net](mailto:lkozak@gci.net)  
Address  
PO Box 2684  
Kodiak, Alaska 99615

**TO:** Alaska Board of Fisheries

From: Linda Kozak - Crab Observer Oversight Task Force

SUBJ: COOTF Membership

In the past six months, two members of the Crab Observer Oversight Task Force have resigned from their positions. A call for nominations was sent out to the various crab organizations in Alaska and Washington, as well as to the cooperatives. The nomination period was open for about 45 days and during that time, only one name was submitted for consideration.

The members of the Crab Observer Oversight Task Force would like to recommend that the Board of Fisheries appoint Craig Lowenberg to fill one of the vacancies on the Task Force.

Following is contact information and a brief summary of Craig's involvement in the fishery.

Thank you for your consideration to this request.

**Craig Lowenberg:**

Having been born and raised in Kodiak, AK into a fishing family, I have been involved in the fishing industry, one way or another, essentially all of my life. I am currently the manager and co-owner of a vessel that participates in the BSAI Crab Rationalization program. In 2011, I was appointed to serve on the North Pacific Fisheries Management Council Advisory Panel as the Oregon fixed gear representative. My current term expires in 2018. I also serve on the Board of Directors for Alaska Bering Sea Crabbers (advocacy group for crab harvesters) and Inter-Cooperative Exchange (FCMA Cooperative).

I believe the Crab Observer Oversight Task Force provides an important function and look forward to the opportunity to participate. Feel free to contact me at your convenience if you have any questions or would like additional information. Thank you.

Craig Lowenberg

12042 SE Sunnyside Rd  
PMB 333  
Clackamas, OR 97015

602-451-7752 c  
503-454-0837 f  
[craig@craiglowenberg.com](mailto:craig@craiglowenberg.com)



Submitted By  
Stanley R Steadman  
Submitted On  
9/16/2016 4:07:55 PM  
Affiliation  
no affiliation- sport fisherman

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178 W RIVERVIEW AVE  
Soldotna, Alaska 99669

Thank you for the opportunity to comment. I have been fishing on the Kenai River for 30 years and live in Soldotna. Over the years I have seen the numbers of Out of State fishermen skyrocket. With this happening it has been more and more difficult for local families to find a place to fish from the bank, unless we want to get on the river at 5 a.m. and often "wait in line for someone to leave." It used to be that we could head out after work with family and enjoy an evening of fishing. That time has passed. It is particularly difficult to find a place to fish when the minimum escapement level has been reached and the limit goes to six fish. Fishermen from out of the area are not going to leave their spots until they have caught their six, making it all the more difficult to find a spot. My suggestion would be to come up with a management plan that keeps the catch limit at three fish. Also, in one area I like to fish, the Kenai River Center, there is always the same group of German's who catch their limit in the morning, come back and catch it again after lunch, and then give it one more shot after dinner. I know this because I like to go in the morning (I practice the one and done approach--1 fish and go home), then try it again in the evening. This approach didn't work well this year, because I could not stay all morning or evening to find a spot. I would suggest Fish and Game target key spots to nail these out of state fishermen. Thanks



Submitted By  
Tom Manning  
Submitted On  
9/20/2016 2:29:26 PM  
Affiliation  
Krestof Clam Co.

Phone  
907 463 3431  
Email  
[sayulitamex@gmail.com](mailto:sayulitamex@gmail.com)  
Address  
622 Hemlock Way  
Juneau, Alaska 99801

Ak. Fish & Game Board

I am writing to request a species inclusion of Geoduck clams to section Ak. 5 AAC 41.070. I was advised that the same wording used to allow Weatervane Scallops would be appropriate to include Geoduck clams for hatchery spawning in established hatcheries outside of Alaska. I would like to propose a section F to this list, adding Geoduck clams.

Alaska hatcheries have so far been unable to produce viable geoduck seed in State for Alaskan shell-fish farmers. I have had a clam farm for over 12 years and have only received healthy stock twice and they were not in sufficient quantity to support a commercial operation.

Thank you for your consideration,

Tom Manning

**[5 AAC 41.070. Prohibitions on importation and release of live fish](#)**

(a) Except as provided in (b) - (d) of this section, no person may import any live fish into the state for purposes of stocking or rearing in the waters of the state.

(b) Live oysters native to and originating from the Pacific Coast of North America may be imported for aquaculture purposes, under a permit required by this chapter, and may be released into the waters of the state only if the

(1) broodstock is derived from oysters commercially cultured on the Pacific Coast of North America through three or more generations; and

(2) disease history or an inspection indicates no incidence of disease that is not indigenous to the state or is not considered to be a risk to indigenous stocks, and oyster health or marketability.

(c) Ornamental fish not raised for human consumption or sport fishing purposes may be imported into the state, but may not be reared in or released into the waters of the state. Fish wastes and waste water from ornamental fish may not be released directly into the waters of the state.

(d) Weathervane scallops originating from wild stocks or cultured stocks in the Southeastern Alaska and Yakutat Areas may be imported for aquaculture purposes and may be released only into the waters of the Southeastern Alaska and Yakutat Areas under a permit required by this chapter only if the

(1) broodstock was taken under the provisions of a permit issued by the department;

(2) broodstock was certified by the department's fish pathology section before transport out of the state;

(3) broodstock was held continuously in a department-approved isolation facility;

(4) weathervane scallops proposed for import have been held continuously in a department-approved isolation facility before import into the state;

(5) disease history, or an inspection, of the weathervane scallops proposed for import indicates no incidence of a disease of transport significance.

(e) A person may not import, own, possess, breed, transport, distribute, release, purchase or sell within this state any species listed under 50 C.F.R. 16.13, as revised as of October 1, 2002, as an injurious live, or dead fish, mollusk, crustacean, or their eggs.

(f) Geoduck Clams originating from wild stocks or cultured stocks in the Southeastern Alaska and Yakutat Areas may be imported for aquaculture purposes and may be released only into the waters of the Southeastern Alaska and Yakutat Areas under a permit required by this chapter only if the



- (1) broodstock was taken under the provisions of a permit issued by the department;
- (2) broodstock was certified by the department's fish pathology section before transport out of the state;
- (3) broodstock was held continuously in a department-approved isolation facility;
- (4) Geoduck clams proposed for import have been held continuously in a department-approved isolation facility before import into the state;
- (5) disease history, or an inspection, of the geoduck clams proposed for import indicates no incidence of a disease of transport significance.





Submitted By  
Joel Doner  
Submitted On  
9/28/2016 7:47:06 AM  
Affiliation  
Anchorage Advisory Committee

~~Members of the Alaska Board of Fisheries,

We, the Anchorage Fish and Game Advisory Committee, are writing to support the salmon habitat proposal that seeks Board of Fish action to recommend that the legislature update Alaska's fish habitat permitting law under Title 16. It is notable to our committee that this proposal was brought forward by a diverse group of Alaskans who practice subsistence, personal use, commercial, and sport fishing. It is not often that a proposal comes before our body or yours that is supported by representatives from all of the fisheries user groups.

AS 16.05.871, which gives the Department of Fish and Game its authority to issue permits for development projects that may impact fish habitat, lacks specific criteria that defines what is or isn't an acceptable level of development activity in Alaska's anadromous fish habitat. The Board of Fish specifically developed the Sustainable Salmon Policy to "ensure conservation of salmon and salmon's required marine and aquatic habitats, protection of customary and traditional subsistence uses and other uses, and the sustained economic health of Alaska's fishing communities." 5 AAC 39.222(b). As Alaska faces an ever increasing number of applications for both large and small development projects, we think all Alaskans will agree that ensuring development is done in a responsible manner that truly protects the sustainability of our fisheries resources is critical.

Thus, it is time for Alaska to revisit one of its oldest laws in order to ensure it contains the appropriate sideboards to assist the Alaska Department of Fish and Game in clarifying how development should be permitted in anadromous fish habitat. Thank you very much for your careful consideration of this matter.

Joel Doner, Chair  
Anchorage Fish & Game Advisory Committee



Submitted By  
Linda Fisch  
Submitted On  
9/27/2016 10:10:19 PM  
Affiliation

Phone  
9073762055

Email  
[akfish@mtaonline.net](mailto:akfish@mtaonline.net)

Address  
P.O. Box 876286  
Wasilla, Alaska 99687

I commercial fished in Cook Inlet for over 10 years and I am a long time Alaska resident living in Wasilla for 29 years Kenai peninsula for 5 and Fbks for the 10 years as I was a young 20 yr old. My Husband is born and raised in Palmer third generation. I SUPPORT AND STAND FOR THE SALMON PROPOSAL TO STRENGTHEN ALASKA'S fish habitat permits through a revision of and an update to Title 16. As board of fish members it makes sense to support this proposal and keep Alaska thriving. I reside along Paradise Lake in Wasilla. I have experienced first-hand how the non-specific and broad language in Title 16 has many loopholes which allow projects to continue that degrade and reduce the abundance of our salmon. The State of Alaska is facing a budget crisis and the economy is unlikely to improve in the new few years-- Our State Constitution was drafted with salmon as a key focus. I implore you- do not lose focus now. Salmon employ thousands of Alaskans and attract ten more thousands of tourists. As Members of Board of Fish you have the ability to recommend changes to Title 16 that protect Salmon habitat and ecosystems in the Cook Inlet Watersheds. Please do this Please otherwise Alaska will go down the tubes.

Sincerely

Linda Fisch



Submitted By  
Patricia Scudder  
Submitted On  
9/27/2016 2:39:27 PM  
Affiliation

I have been fortunate to spend about half my time in Alaska each year, visiting my family, who have made Alaska their home since 2005. One of the things about your great state that has both impressed and appalled me at the same time are the abundant salmon resources. My time in Alaska has been spent fishing throughout South Central from Homer to the Denali Hwy, in Prince William Sound and in almost any stream that I can find in between. Alaska is unique in the protections that have been given to salmon, but more needs to be done. As members of the Board of Fish please update Title 16 and listen to the people – both in Alaska, and from consumers and tourists of other states that spent upward of \$30 a pound for fresh, Wild Alaska Salmon at the start of each summer. Alaska is the “last frontier” for certain, but you should learn from the mistakes made in New England and the Pacific Northwest and ensure that Alaska’s salmon remains abundant through enhanced habitat protection. Thank you for putting this proposal on the agenda for your work session in October 2016.

Thank you -

Patricia Scudder



Submitted By  
Emily Leak  
Submitted On  
9/28/2016 2:05:52 PM  
Affiliation

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303-895-5742  
Email  
[leak.emily@gmail.com](mailto:leak.emily@gmail.com)

Address  
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Anchorage, Alaska 99523

Emily Leak's Public Testimony: 9/27/16

My name is Emily Leak, I am currently a student at UAA and I would like to give testimony on the resolution to title 16.

-I was raised on wild fish and game, my parents were adamant that it was the healthiest way to raise and feed their children

-My parents are hunters and fisherman and I was raised hunting, fishing, hiking and camping and was taught to appreciate the outdoors and its capacity to feed our family.

- My first summer in Alaska, before I had decided to live here forever, I ate salmon everyday. At every social event, every meal I shared with family and friends we ate moose and salmon.

-And it became clear to me immediately the abundance of our wild fish and game here in Alaska.

-I grew up in CO and left because of the growth of the state

-huge influxes of people, hundreds of people per day and I felt it was losing its feeling of being a resource rich rural area

-My decision to stay in Alaska indefinitely has been strongly driven by the prospect of continuing to live in the way I was raised and the potentiality of raising a family the way I was fed on wild fish and game

-for these reasons I feel strongly that our salmon populations and salmon habitat need to be protected and preserved for the future so that this way of life can remain a possibility for future generations

-That is why I support the resolution to title 16 and I encourage you to support the resolution as well



Submitted By  
Satchel Pondolfino  
Submitted On  
9/28/2016 7:55:03 PM  
Affiliation

I am a lifelong Alaskan, born and raised here in Anchorage. Like most Alaskans I have grown up with the luxury of having salmon as a staple at the dinner table. I never realized what a gift this was until I moved to Oregon to attend university. I quickly discovered that most people go fishing at the local Costco and salmon especially, is saved for special occasions. Well thankfully after a few dismayed phone calls to my dad, my Alaskan roots provided for me and a cooler full of salmon soon arrived on my doorstep and my dinner table quickly became a popular one.

Now that I am back living in Alaska again, I am so happy the days of the cooler are over and I have returned to a state with abundant salmon runs and deep freezers. I studied environmental policy in university. It is clear to me when legal language is too vague to serve the purpose it is intended for. It is also clear to me that the culture around salmon in Alaska is unique to our state, and is dependent upon sustaining strong runs so that we have the resources to maintain this way of life. Title 16 is long overdue for an update, I urge you to do what you can within your power to make sure we protect this amazing resource by adopting the resolution to upgrade title 16.



Submitted By  
Lorraine Crawford  
Submitted On  
9/29/2016 11:01:21 AM  
Affiliation  
Citizen

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[scrawfor@alaska.net](mailto:scrawfor@alaska.net)  
Address  
36615 Chinulna Drive  
Kenai, Alaska 99611

I would like the Board of Fish to strengthen the sustainable salmon policy (Prop N, Title 16). It is fundamental to protect fish habitat for the sustainability of all user groups and all fish species. I would urge the BOF to vote on this proposal and strengthen state law to protect all fish habitat.



Submitted By  
Matthew Koenig  
Submitted On  
9/29/2016 1:31:36 PM  
Affiliation

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Address  
540 Irwin St  
Anchorage, Alaska 99508

Dear Board of Fish members -

First up I want to thank the Anchorage AC for hosting this meeting and opportunity to provide input.

My name is Matt Koenig - and I'm writing to support the proposed changes to Title 16. I did not have the good fortune to be born and raised here, but I felt drawn here because Alaska is rich in natural resources - including abundant fishing opportunities, and that is something that is increasingly rare in the world.

Before I was here I lived in Los Angeles. There were kings there once, or so I'm told, good luck finding any now. I lived in the Pacific Northwest for a time - there are salmon, but due to a lack of information and foresight the runs are not historic levels. Overfishing and harmful fishing practices, habitat loss through dams, hatcheries, pollution and the effects warming streams have caused a death by a thousand cuts situation. The lower 48 is playing a game of habitat recovery and remediation - spending millions of dollars to revert impacts as best they can to restore runs to a portion of what they once were. We've seen what can happen.

I don't want to see this in my new home in Alaska.

In my mind this is a no brainer, we have to learn from the mistakes made in the Lower 48 and do a better job in Alaska to protect our wild salmon. It all comes back to habitat. Without habitat, there are no salmon. It's crucial that title 16 is updated to give ADF&G clear guidelines and enforceable language for when a permit should be approved or denied, to give them the tools that they need to ensure salmon habitat is protected for future generations.

Thanks for your time.



Submitted By  
Rebecca Long  
Submitted On  
9/29/2016 2:19:58 PM  
Affiliation  
self

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Talkeetna, Alaska 99676

~~Upper Cook Inlet Area All Finfish Meeting  
Rebecca Long Comments Supporting Habitat Protection Proposal

September 22, 2016

I support the Proposal that the Board of Fish recommend to the Alaska Legislature to clarify the criteria for fish habitat permitting to better protect Cook Inlet Fisheries.

My family has made its living as commercial fish tenderers and fishers and in the tourism industry in Southcentral Alaska. We are also personal use fishers.

I have had personal experience with at least 10 Habitat Permits in Southcentral Alaska. My experience has shown that fish habitat has been jeopardized by some of these permit approvals

Lack of Public Transparency

There is no public notice of applicants for Fish Habitat (FH) permits. Thus, there is no way for the public to even know about the existence of the permit application or even commenting on these permits. Many times the public finds out about the existence of a FH permit only when the applicant applies for a state Land Use Permit. The Department is losing valuable local knowledge of the waterway and area involved in the permit without a mechanism for prior public knowledge of a permit application.

Inconsistent Permit Terms

Some FH permits restrict crossing of anadromous streams only to the winter months when the ice/snow conditions can support the equipment crossing being permitted. But then you get FH permits like the last two years at the mouth of Larson Creek near Talkeetna that are allowing crossing of an important anadromous stream with heavy equipment over 10,000 pounds right in the middle of sockeye salmon migration and spawning. There seems to be no rhyme or reason to the permit terms.

I believe that the Board of Fish's enacted Sustainable Salmon Policy should become part of Title 16. This would strengthen the Alaska Department of Fish and Game's Habitat Permits and address the above-mentioned weaknesses of the current policies...

This Sustainable Salmon Proposal in front of you is supported by sport, commercial, personal use and subsistence fishers, business owners, tribal entities and the scientific community. It would be a habitat protection measure that will ensure our anadromous fisheries continue to be sustainable. The 61 year old Title 16 regulates our fisheries and is unique among the state governments. But changes are necessary in order to keep pace with the modern world. Regulatory streamlining by Alaskan administrations since 2000 has eroded habitat protections and the public's ability to sufficiently protect anadromous fish habitat. Degradation has occurred. Our salmon fisheries were Alaska's first economic engine. We want it to continue to be important economically especially in the low state budgetary years.

What is at risk:

- 10,840 seafood industry jobs in Southcentral, of which are 7660 jobs held by Southcentral residents,
- An estimate of \$247 million in direct labor income. With the multiplier impact generation of another \$164 million for a total of \$411 million,
- Total economic input to Southcentral of \$1.2 billion considering the wholesale value and the gross value through secondary impacts. (All 3 bullet points are 2013 data from The Economic Impact of the Seafood Industry in Southcentral Alaska, June 2015 by the McDowell group for the Alaska Salmon Alliance.)

Because there is no regulations in Title 16 that define protection of fish populations and their habitat, the HB permits are issued with few restrictions. I believe the habitat criteria in the Board of Fish Sustainable Salmon Policy could be used to define those protections and strengthen Title 16.

I urge you to act in support of this current proposal before you.

Rebecca Long





Submitted By  
Denis Ransy  
Submitted On  
9/29/2016 2:31:43 PM  
Affiliation  
myself only  
  
Phone  
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[conga33@hotmail.com](mailto:conga33@hotmail.com)  
Address  
Post Office Box 344  
Talkeetna, Alaska 99676

~~Denis Ransy Comments to Upper Cook Inlet Area All Finfish 2016 Meeting In Support of Sustainable Salmon Proposal by Lindsey Bloom et al

Our Board of Fisheries would do us a great service if it recommended to the legislature changes to the Fish Habitat Permit system to completely enforce the Sustainable Salmon Policy. This action would go a long way toward maintaining Cook Inlet's valuable salmon runs for all users.

I have fished for personal use for 40 years and commercial fished for 15 years so I know how important anadromous fisheries are. Alaska's salmon fisheries are without a doubt one of the world's few remaining truly sustainable anadromous fisheries. Where else can a fishery supply food for: all residents who desire it, a viable commercial fishery, and thousands of residents and non-residents jobs. Alaska's Sustainable Salmon Policy's is currently not being implemented in the Alaska Department of Fish and Game's Fish Habitat permits. Permitting practices for heavy equipment moves, construction projects, mining and other potentially habitat and waterway damaging activities are very loose. Oversight inspections and penalties for infractions are rare. Waivers of requirements are commonly allowed. All these problems endanger our world class fisheries, and many long-held livelihoods. I have witnessed these situations in my home neighborhood of Larson Creek regarding Fish Habitat Permits; and I am aware of other situations.



**CONCERNED AREA M FISHERMEN**  
35717 Walkabout Road, Homer, Alaska 99603  
(907) 235-2631

September 30, 2016

John Jensen, Chairman  
Alaska Board of Fisheries  
P.O. 25526  
Juneau, Alaska 99802-5526



Re: ACR 4

Dear Mr. Jensen and Board Members:

We are writing to express our strong opposition to agenda change request (ACR) 4 that seeks to add the South Unimak and Shumagin Islands June fishery (5 AAC 09.365) to your agenda for this year's meeting cycle. This ACR was filed in the name of the Fairbanks Fish and Game Advisory Committee. For the reasons discussed below, Concerned Area M Fishermen (CAMF) submits that the ACR meets none of the three criteria for consideration by the Board.

First, the ACR asserts that out-of-cycle review of the June fishery is justified by a need to limit the harvest of Chinook salmon in the fishery to its historic levels. But as the following data show, the Chinook harvest in the fishery has been very consistent, including in the season just concluded:

	Avg. 1994-2013	Avg. 2004-2013	2016 Harvest
Shumagin Islands	2,160	2,260	2,716
South Unimak	1,954	1,597	1,127
June Fishery Total	4,114	3,857	3,843

Source: Fishery Management Report, 15-35, South Alaska Peninsula Annual Salmon Management, 2014 (Keyse and Fox, September 2015), Appendices B4 and B9; and 2016 Inseason Harvest Summary (ADF&G).

The 2016 Chinook harvest in the June fishery was in line with historic harvests, and there is no reason to believe that this harvest level will change in the two years between now and the next regularly-scheduled Alaska Peninsula meeting. Nor is there any basis to assume that the harvest spike in the 2015 season will be repeated. The Board earlier this year twice reviewed the 2015 harvest. During those meetings, the Department described it as an anomaly, a function of very high Chinook abundance in the Gulf of Alaska, driven by production from rivers and hatcheries in the Pacific Northwest at levels that have not been seen since the pre-dam era on the Columbia River. The fact that the 2016 Chinook harvest in the June fishery returned to normal levels demonstrates that 2015 was indeed an abnormal year.



Second, the best available scientific evidence suggests that AYK Chinook salmon are not harvested in the June fishery. A recent genetic stock composition study of Chinook salmon bycatch in three Gulf of Alaska trawl fisheries in 2014, on the south side of the Alaska Peninsula, in the vicinity of the June fishery, indicates that 95 percent of the fish originated in areas to the south and east of the Alaska Peninsula, mostly from British Columbia and the West Coast of the U.S.<sup>1</sup> More importantly for purposes of ACR 4, this report demonstrated that there were no – repeat, no – Yukon River Chinook salmon present in the bycatch samples. Attached are figures and tables from the report relevant to this point. This presents a situation not unlike that for Yukon fall chum salmon, which may be the closest analog to Yukon River king salmon. Yukon fall chum were for many years cited as the basis for restricting the June fishery, until their absence from the fishery was confirmed by numerous studies, including WASSIP. The Board should not simply assume that Yukon River Chinook salmon are caught in the June fishery when the best available scientific evidence points to a contrary conclusion.

Finally, we object strenuously to the Fairbanks A.C. making another run at restricting the June fishery on the basis of the harvest of king salmon. The Board heard evidence on this issue at the regular Alaska Peninsula meeting in February, in deliberations that centered on proposal 184, which was submitted by the Fairbanks A.C. The Board again considered this issue at its statewide meeting in March, in response to an emergency petition also filed by the Fairbanks A.C. The facts and issues surrounding the king harvest in the June fishery were fully aired at these meetings, in general staff reports, in public testimony, in the Committee of the Whole process, and during deliberations, and the Board made a reasoned and responsible decision not to impose the kinds of dramatic restrictions on the June fishery called for by the A.C. Unfazed, the A.C. is now asking the Board again to take up the June fishery out-of-cycle despite having failed in its prior efforts. The only thing that has changed since the earlier meetings is the composition of the Board, and it is clear that the A.C. is hoping to capitalize on that. The Board should firmly reject the A.C.'s effort to game the system. Forcing Alaska Peninsula residents and fishermen to attend yet another Board meeting, to defend their fishery and livelihood outside the normal cycle, is unwarranted and burdensome. Scheduling another contentious Area M-AYK meeting outside the normal regulatory cycle would also be very costly to the Department, adding at least a day or two of meeting time and requiring the staff to incur substantial time and expense preparing for and attending such a meeting.

CAMF strongly urges the Board to reject ACR 4. There simply is no legitimate conservation purpose or reason to take up the June fishery again in this meeting cycle.

Sincerely,

A handwritten signature in cursive script that reads "Steve Brown".

Steve Brown

President, Concerned Area M Fishermen

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<sup>1</sup> Guthrie, *et al.*, "Genetic Stock Composition Analysis of the Chinook Salmon Bycatch Samples from the 2014 Gulf of Alaska Trawl Fishery," NOAA Technical Memorandum NMFS-AFSC-311 (January 2016). This report was presented to the North Pacific Fishery Management Council at its April 2016 meeting and can be found in full on the Council's website.



## NOAA Technical Memorandum NMFS-AFSC-311

doi:10.7289/V5/TM-AFSC-311

# Genetic Stock Composition Analysis of the Chinook Salmon Bycatch Samples from the 2014 Gulf of Alaska Trawl Fishery

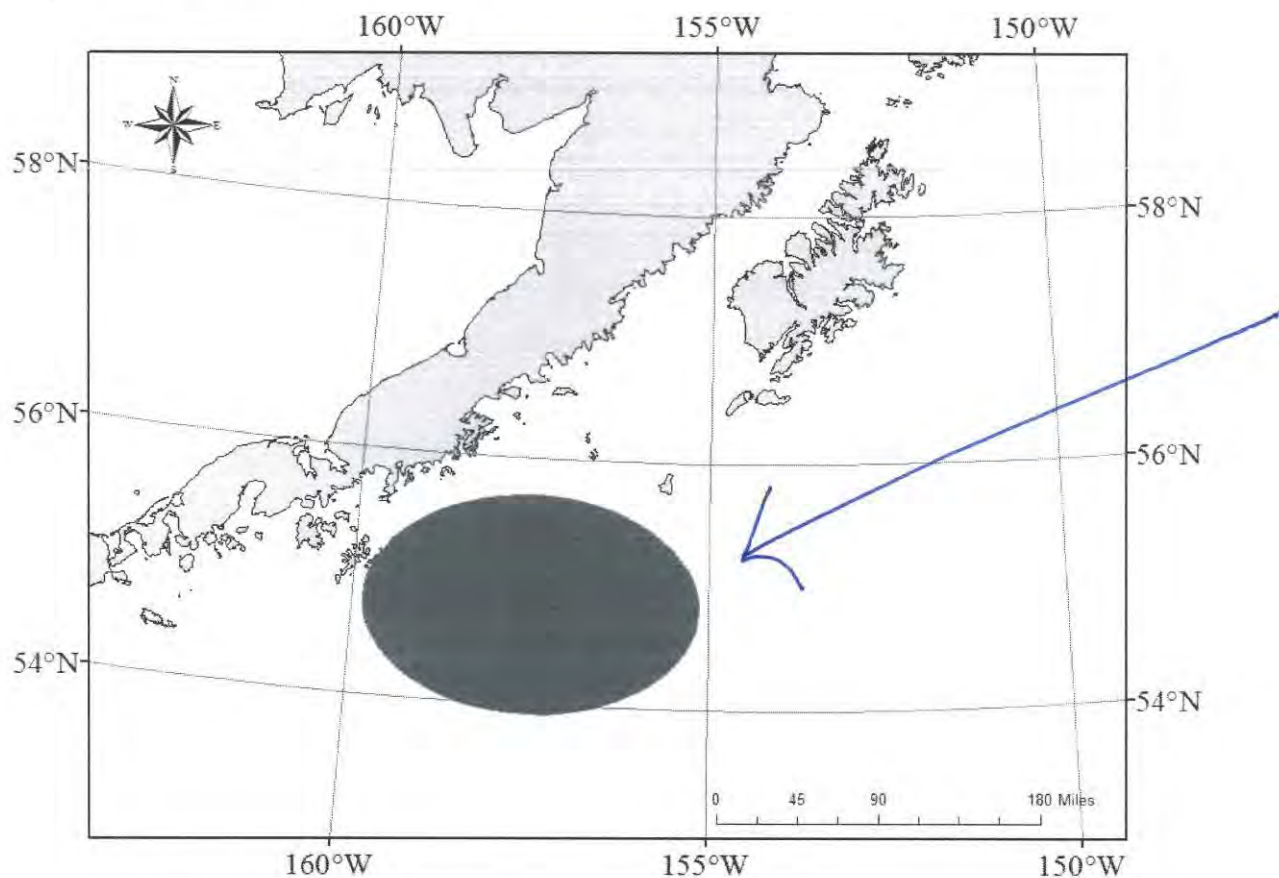
by  
C. M. Guthrie, III, H. T. Nguyen, and J. R. Guyon

**U.S. DEPARTMENT OF COMMERCE**  
National Oceanic and Atmospheric Administration  
National Marine Fisheries Service  
Alaska Fisheries Science Center

January 2016



fishery, but because samples were taken opportunistically, the sample distribution at this time is not considered representative of the entire bycatch but is used to indicate presence/absence of particular Chinook salmon stocks. The sample collection area from the arrowtooth flounder trawl fishery is approximated in Figure 7.



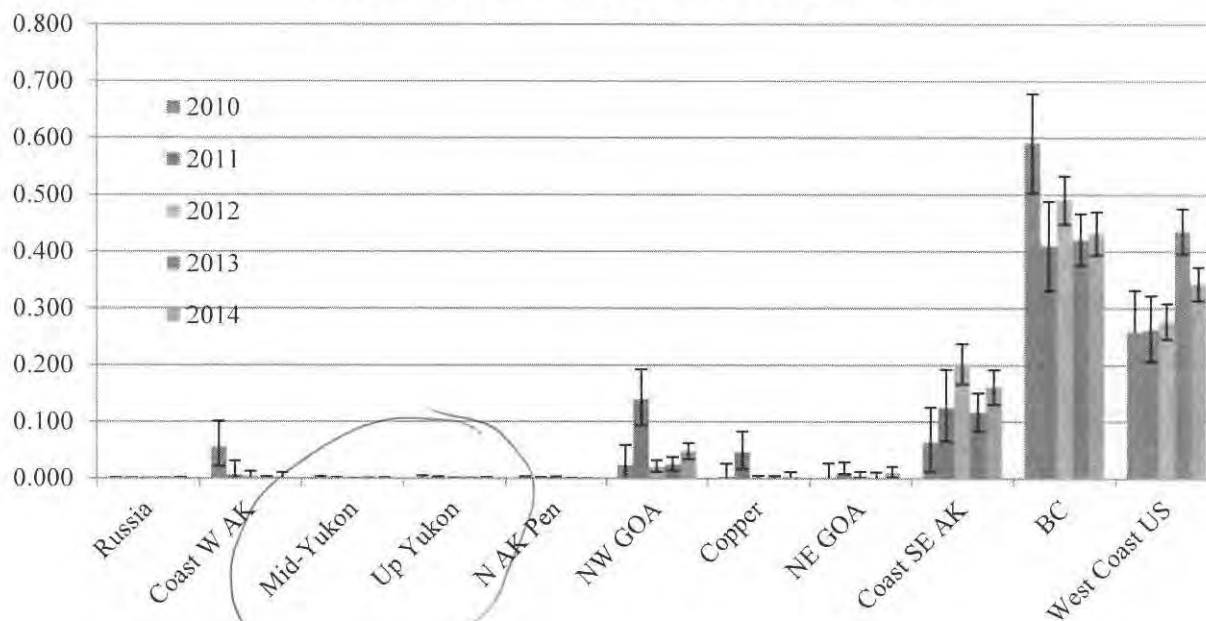
**Figure 7.** -- Approximate location (NMFS Statistical Areas 610 and 620) of 560 Chinook salmon bycatch samples collected by the Alaska Seafood Cooperative in the 2014 GOA arrowtooth flounder trawl fishery.



**Table 1.** – Regional BAYES and SPAM stock composition estimates for the 1,163 Chinook salmon samples from the bycatch of the 2014 GOA pollock trawl fishery. The BAYES mean estimates are also provided with standard deviations (SD), 95% credible intervals, and the median estimate. Standard deviations for the SPAM estimates were determined by the analysis of 1,000 bootstrap resamplings of the mixture.

<u>Region</u>	<u>BAYES</u>	<u>SD</u>	<u>2.5%</u>	<u>Median</u>	<u>97.5%</u>	<u>SPAM</u>	<u>SD</u>
Russia	<b>0.000</b>	0.001	0.000	0.000	0.002	<b>0.002</b>	0.000
Coast W AK	<b>0.003</b>	0.003	0.000	0.002	0.011	<b>0.004</b>	0.000
Mid-Yukon	<b>0.000</b>	0.000	0.000	0.000	0.001	<b>0.002</b>	0.000
Up Yukon	<b>0.000</b>	0.001	0.000	0.000	0.002	<b>0.000</b>	0.000
N AK Penn	<b>0.000</b>	0.000	0.000	0.000	0.001	<b>0.000</b>	0.000
NW GOA	<b>0.048</b>	0.007	0.035	0.048	0.063	<b>0.045</b>	0.003
Copper	<b>0.003</b>	0.003	0.000	0.002	0.012	<b>0.005</b>	0.001
NE GOA	<b>0.010</b>	0.005	0.002	0.009	0.021	<b>0.015</b>	0.001
Coast SE AK	<b>0.161</b>	0.015	0.131	0.161	0.192	<b>0.151</b>	0.005
BC	<b>0.432</b>	0.019	0.394	0.432	0.470	<b>0.434</b>	0.013
WA/OR/CA	<b>0.343</b>	0.015	0.314	0.343	0.373	<b>0.341</b>	0.012

### GOA Chinook Bycatch by Year



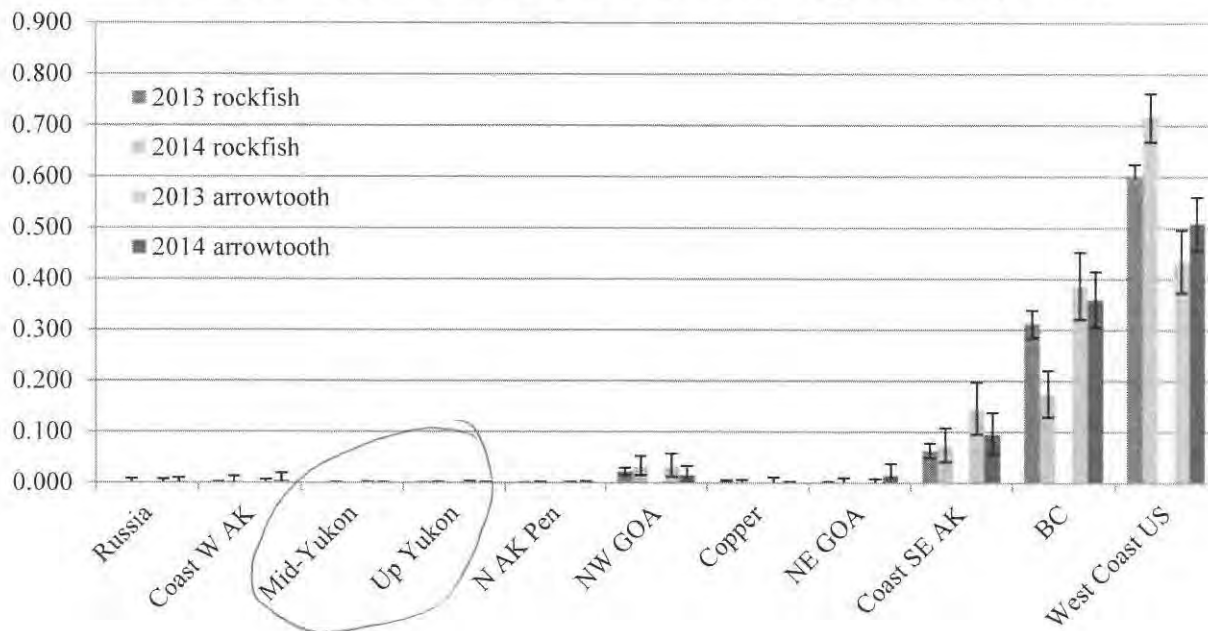
**Figure 8.** -- Comparison of yearly stock composition estimates (2010-2014) based on available genetic samples from the GOA Chinook salmon bycatch. The same genetic baseline and general regional groupings were used in all analyses. BAYES 95% credible intervals are plotted for yearly estimates.



**Table 11.** -- Regional BAYES and SPAM stock composition estimates for the 398 genotyped samples from the bycatch of the 2014 GOA rockfish CV trawl fishery. The BAYES mean estimates are also provided with standard deviations (SD), 95% credible intervals, and the median estimate. Standard deviations for the SPAM estimates were determined by the analysis of 1,000 bootstrap resamplings of the mixture.

<u>Region</u>	<u>BAYES</u>	<u>SD</u>	<u>2.5%</u>	<u>Median</u>	<u>97.5%</u>	<u>SPAM</u>	<u>SD</u>
Russia	<b>0.001</b>	0.002	0.000	0.000	0.008	<b>0.003</b>	0.001
Coast W AK	<b>0.003</b>	0.004	0.000	0.002	0.013	<b>0.003</b>	0.000
Mid-Yukon	<b>0.000</b>	0.001	0.000	0.000	0.001	<b>0.000</b>	0.000
Up Yukon	<b>0.000</b>	0.001	0.000	0.000	0.002	<b>0.000</b>	0.000
N AK Penn	<b>0.000</b>	0.001	0.000	0.000	0.003	<b>0.000</b>	0.000
NW GOA	<b>0.032</b>	0.010	0.015	0.031	0.053	<b>0.027</b>	0.006
Copper	<b>0.001</b>	0.002	0.000	0.000	0.006	<b>0.003</b>	0.001
NE GOA	<b>0.001</b>	0.003	0.000	0.000	0.010	<b>0.002</b>	0.001
Coast SE AK	<b>0.071</b>	0.017	0.041	0.070	0.108	<b>0.074</b>	0.004
BC	<b>0.174</b>	0.023	0.130	0.174	0.221	<b>0.186</b>	0.012
WA/OR/CA	<b>0.717</b>	0.024	0.669	0.717	0.763	<b>0.703</b>	0.032

### GOA Rockfish/Arrowtooth Chinook Bycatch by Year



**Figure 11.** -- Comparison of stock composition estimates from Chinook salmon bycatch samples collected from the 2013 and 2014 GOA rockfish and arrowtooth trawl fishery.



## Gulf of Alaska Arrowtooth Flounder Trawl Fishery

Stock composition estimates were made from the 404 Chinook salmon bycatch samples collected throughout the 2014 GOA arrowtooth flounder trawl fishery from the catcher-processors (CP) FV *Vardal* and FV *US Intrepid*. West Coast U.S. stocks (WA/OR/CA) represented the largest stock grouping (51%) with smaller contributions from British Columbia (36%), Coastal Southeast Alaska (10%), Northeast GOA (2%) and Northwest GOA (2%) stocks (Table 12). There were more West Coast U.S. (WA/OR/CA) (51% vs. 43%) and minutely less British Columbia (36% vs. 38%) present in 2014 (Fig. 11), but the majority were from southern regions (96%) in both years.

**Table 12.** -- Regional BAYES and SPAM stock composition estimates for the 404 genotyped samples from the bycatch of the 2014 GOA arrowtooth trawl fishery. The BAYES mean estimates are also provided with standard deviations (SD), 95% credible intervals, and the median estimate. Standard deviations for the SPAM estimates were determined by the analysis of 1,000 bootstrap resamplings of the mixture.

<u>Region</u>	<u>BAYES</u>	<u>SD</u>	<u>2.5%</u>	<u>Median</u>	<u>97.5%</u>	<u>SPAM</u>	<u>SD</u>
Russia	<b>0.003</b>	0.003	0.000	0.002	0.010	<b>0.003</b>	0.000
Coast W AK	<b>0.005</b>	0.006	0.000	0.003	0.019	<b>0.006</b>	0.003
Mid-Yukon	<b>0.000</b>	0.001	0.000	0.000	0.001	<b>0.002</b>	0.000
Up Yukon	<b>0.000</b>	0.001	0.000	0.000	0.002	<b>0.000</b>	0.000
N AK Penn	<b>0.000</b>	0.001	0.000	0.000	0.003	<b>0.000</b>	0.000
NW GOA	<b>0.015</b>	0.008	0.002	0.014	0.034	<b>0.017</b>	0.003
Copper	<b>0.000</b>	0.001	0.000	0.000	0.002	<b>0.000</b>	0.000
NE GOA	<b>0.015</b>	0.010	0.000	0.014	0.038	<b>0.017</b>	0.001
Coast SE AK	<b>0.095</b>	0.020	0.058	0.094	0.138	<b>0.067</b>	0.004
BC	<b>0.359</b>	0.028	0.306	0.359	0.415	<b>0.387</b>	0.020
WA/OR/CA	<b>0.509</b>	0.027	0.456	0.509	0.561	<b>0.500</b>	0.025





Submitted By  
Allison Haines  
Submitted On  
9/30/2016 10:34:08 AM  
Affiliation

To the Board of Fish members -

My name is Allison Haines, and I am a student at UAA and a lifelong Alaskan. In the twenty years I've lived here, I have spent a significant amount of time outdoors. The beauty of our state is unparalleled, and our unique landscape allows the state to be international leaders in markets such as seafood. The seafood industry is Alaska's largest private sector employer, and creates over 63,000 direct jobs throughout the state. And we love catching and eating fish! We have the right as residents to have a say in how decisions - which could adversely affect our environment and economy - are made.

That is why I am writing in support of the proposal to give Title 16 a much needed update. The ambiguous nature of Title 16 is overdue for a change that will let Alaskans have some control in protecting salmon habitats. People like my uncle and his family heavily depend on subsistence fishing. Please listen to the chorus of Alaskans calling for change. We want to be a part of decisions which shape the future of our state and our lives. I implore you to approve the proposed revisions to Title 16, for the good of Alaskans, fisheries, and the world.

Thank you for your time and service,

Allison Haines



Submitted By  
Ashley Plante  
Submitted On  
9/30/2016 3:24:43 PM  
Affiliation

Phone  
8609175308  
Email  
[aplante86@gmail.com](mailto:aplante86@gmail.com)

Address  
2040 Farmer Place  
Anchorage, Alaska 99508

Dear Board of Fish members -

My name is Ashley. I started my relationship with Alaska about 12 years ago as a freshman at APU. I came here from Connecticut and had never tried salmon. I didn't try it my freshman year, but before long I came to love wild salmon as any other Alaskan does. I have enjoyed it in all its culinary varieties, teaching my camp kids about them and watching salmon bring people together.

In the state that our country is in, we need more things that bring people together. We need to make changes to title 16, that has seen limited updates since statehood. We need to make these changes more specific, and detailed so the permitting process is clear and has improved criteria. We need to protect salmon for future generations, for our industry and the people of Alaska of all backgrounds.

Thank you for your time.

Ashley Plante



Submitted By  
Lyn Franks  
Submitted On  
9/30/2016 2:09:27 PM  
Affiliation

Dear Alaska Board of Fisheries,

As an Alaskan resident of over thirty years and an avid sport fisherman, I am writing to support your implementation of the Sustainable Salmon proposal, and the proposed changes to title 16. I believe that this proposal will help to strengthen Alaska's fish habitat and protect this habitat for generations to come. I am concerned how the current title 16 does not solidly define the nature of fish protection.

Alaska natural resources should be kept healthy for Alaskans and not traded for outside interests. I believe that updating title 16 will help accomplish this task! Alaskans deserve a law that states clear intent to protect fish and fish habitat.

Thank you for your time and attention to this important issue - please let the state legislature know my comments.

Sincerely,

Lyn Frank