AGENDA CHANGE REQUEST FORM
ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept these agenda change requests (ACRs) only:

1)r for a fishery conservation purpose or reason; orr
2)r to correct an error in regulation; orr
3)r to correct an effect on a fishery that was unforeseen when a regulation was adopted.r

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1)rCITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible,r enter the series of letters and numbers that identify the regulation to be changed. If it will be a newr section, enter "5 AAC NEW".r

Alaska Administrative Code Number 5 AAC: 06.373 Alagnak River Sockeye Salmon Special Harvest Area (ARSHA).

2)r WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAILr THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly andr concisely. The board will reject multiple or confusing issues.r

Click here to enter text.

Gillnet specifications and operations are unclear for gillnet fisheries in the ARSHA. For example, it is unclear if the Board intended to allow set gillnet CFEC permit holders operate gear seaward, or off shore, of other set gillnet permit holders.

3)r WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the newr or amended regulation say?r

5 AAC 06.331 defines gillnet specifications and operations in Bristol Bay.

The purpose of this ACR is to reduce misunderstanding by defining in 5 AAC 06.373 which sections of 5 AAC 06.331 do not apply to the ARSHA and by adding language to 5 AAC 06.373 to clarify Board intent. Proposed language is not included at this time to allow the board to determine in the first instance what parts of 5 AAC 06.331 apply in the ARSHA.

Proposed language:

(e)rWhen the ARSHA is open under this section, a gillnet may only be operated as follows:r

(1)ra set gillnet may not exceed 25 fathoms in length;r

(2)ra set gillnet may not be set or operated within 150 feet of another set gillnet;r

(3)rrepealed 5/26/2006;r

(4)ra set gillnet must be operated in a substantially straight line perpendicular to the nearest bank of ther Alagnak River;

(5)rrepealed 4/4/2013;r

(6)rall gear and equipment associated with set gillnet fishing in the ARSHA must be removed from ther water when it is not being used to fish in the ARSHA;

(7)lno more than 50 fathoms of drift gillnet may be used to take salmon;l
(8)la CFEC permit holder may not use more than one gillnet to take salmon at any time;l
(9)la drift gillnet vessel may not have more than 150 fathoms of drift gillnet on board the vessel.l
(f)lRepealed 5/26/2006.l
(g)lRepealed 5/26/2006.l
(h) [additional provisions will specify which provisions of 5 AAC 06.331 apply in the ARSHA]

New language proposed above in 5 AAC 06.373(h) will describe which gillnet specifications and operations listed in 5 AAC 06.331 apply in the ARSHA.

4)l STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more ofl the three criteria set forth below is not applicable, state that it is not.l

a)l for a fishery conservation purpose or reason:l
NAl

b)l to correct an error in regulation:l
Regulations are in conflict and/or unclear.l

c)l to correct an effect on a fishery that was unforeseen when a regulation was adopted:l
It was unforeseen that the regulations would be in conflict.l

5)l WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?l
There will continue to be confusion and the Board's intent will be unclear.l

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
The sequence of gillnet fisheries (allocation) is stipulated in 5 AAC 06.373(d) which is not addressed by this ACR.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
NA

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Law enforcement

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
Unknown.

Submitted by:
NAME Alaska Wildlife Troopers
Individual or Group

5700 E Tudor Rd	Anchorage, AK	99507
Address	**City, State**	**Zip**
	907-754-3453	scott.quist@alaska.gov
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SIGNATURE: _____ **DATE:** 8/15/18

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2) to correct an error in regulation; or
3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 06.100

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

5 AAC 06.100 defines the Bristol Bay Area for commercial fisheries. The problem is that the definition does not include drainages of Bristol Bay, yet several regulations in 5 AAC 06 refer to drainages and specific rivers in the Bristol Bay watershed.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

The language in 5 AAC 06.100 should be amended to read the same as 5 AAC 01.300 which is the definition of the Bristol Bay Area in subsistence regulations and includes the phrase, "including drainages".

Delete language: 5 AAC 06.100 Description of Bristol Bay Area [THE BRISTOL BAY AREA INCLUDES ALL WATERS OF ALASKA IN BRISTOL BAY EAST OF A LINE FROM CAPE NEWENHAM 58_ 38.88' N. lat., 162_ 10.51' W. LONG TO CAPE MENSHIKOF AT57_ 28.34' N. lat., 157_ 55.84' W. LONG.]

Amend language to read: 5 AAC 06.100 Description of Bristol Bay Area. **The Bristol Bay Area consists of all waters of Bristol Bay including drainages enclosed by a line from Cape Newenham at 58_ 38.88' N. lat., 162_ 10.51' W. long. to Cape Menshikof at 57_ 28.34' N. lat., 157_ 55.84' W. long.**

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
NA

b) to correct an error in regulation:
The current regulation is erroneous in that it does not include the drainages of Bristol Bay in the definition of the Bristol Bay Area. Excluding drainages from the definition has implications for other regulations.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
NA

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
Any commercial fishery conducted in the drainages of Bristol Bay such as the Naknek, Wood and Alagnak River Sockeye Salmon Special Harvest Area, will be conducted outside of the Bristol Bay Area because "drainages" are specifically excluded from the definition.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
This ACR deals with area definition and will have the same effect on all user groups.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
NA

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Law enforcement.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
Unknown

Submitted by:

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Individual or Group

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Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 06.200(b) Click here to enter text.

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

It is unclear whether drainages of Kvichak Bay, which include the Naknek River Sockeye Salmon Special Harvest Area (NRSHA) and the Alagnak River Sockeye Salmon Harvest Area (ARSHA), are in the Naknek-Kvichak commercial fishing district. There are implications on other regulations if drainages and special harvest areas are or are not in the district. For example, per 5 AAC 06.350(f), salmon may not be taken in any locations that are not described in 5 AAC 06.200. Currently drainages do not appear to be included in 5 AAC 06.200. There are several other areas in regulation that infer some drainages are in the commercial fishing district.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

Amended regulation: 5 AAC 06.200(b) Naknek-Kvichak District: all waters of Kvichak Bay**, including drainages,** north and east of a line from 58 43.73' N lat., 157 42.71' W long. To 58 36.77' N lat., 157 15.82' W. long."

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
NA

b) to correct an error in regulation:
Current regulations are in conflict. The drainages of Kvichak Bay are not described in 5 AAC 06.200 therefore are closed waters based on 5 AAC 06.350(f), this includes the NRSHA and ARSHA. By

including drainages in the definition of 5 AAC 06.200 it will be clear that drainages can be open to commercial fishing, it will also clarify the application of other related regulations.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
See b) above.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
There will continue to be confusion as to how other regulations are applied to the NRSHA and ARSHA.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
Clarifying the regulation would have equal effect on all user groups.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
NA

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Law enforcement.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
Unknown.

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Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 06.360

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

Gillnet specifications and operation in the Naknek River Sockeye Salmon Special Harvest Area (NRSHA) are unclear. 5 AAC 06.331 describes gillnet specifications and operations in Bristol Bay, 5 AAC 06.360(d & e) add additional restrictions to the specifications and operation of gillnets in the NRSHA. In some respects the two regulations are in conflict and there is uncertainty with fishermen and enforcement as to which regulations apply in the NRSHA; the Board's intent is unclear.

Until the summer of 2018 the NRSHA had not been open to commercial fishing for over a decade, in the interim historical knowledge was lost and memories faded. In the days leading up to the fishery there was much discussion between Fish and Game, Alaska Wildlife Troopers (AWT) and commercial fishermen about the Board's intent and about which regulations apply to NRSHA. In the end AWT had to make guesses as to the Board's intent. For example, can one set gillnet permit holder set a net seaward of another set gillnet permit holder? Most fishermen remembered that it was the Board's intent to allow this and it was a common and accepted practice the last time the NRSHA was open. Regulations however do not seem to allow the practice. There are several other examples.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

5 AAC 06.331 defines gillnet specifications and operations in Bristol Bay.

The purpose of this ACR is to reduce misunderstanding by defining in 5 AAC 06.360 which sections of 5 AAC 06.331 do not apply to the NRSHA and by adding language to 5 AAC 06.360 to clarify Board intent. Proposed language is not included at this time to allow the board to determine in the first instance what parts of 5 AAC 06.331 apply in the NRSHA.

Proposed language:

5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.
(d) The following provisions apply to set gillnet fishing in the NRSHA:
(1) no more than 37.5 fathoms of set gillnet may be used to take salmon;
(2) a set gillnet may not be set or operated within 150 feet of another set gillnet;
(3) beyond 500 feet from shore, all gear associated with set gillnet fishing must be removed when it is not being used to fish in the NRSHA;
(4) repealed;
(5) set gillnet running lines may not be in the water during a drift gillnet fishing period;
(6) repealed;
(7) [additional provisions specifying what parts of 5 AAC 06.331 apply in the NRSHA]

New language in 5 AAC 06.360(d)(7) will describe which gillnet specifications and operations from 5 AAC 06.331 apply to the NRSHA.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
NA

b) to correct an error in regulation:
Regulations are in conflict and/or unclear.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
Click here to enter text.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
There will continue to be confusion and the Board's intent will remain unclear.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
Set and drift gillnet fisheries occur at different times in the NRSHA, changes to the specifications and operations of one type of gear will have no effect on the other.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
NA

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Law enforcement.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
Unknown

Submitted by:
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Individual or Group

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Anchorage, AK — **City, State**
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3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 06.358 Wood River Sockeye Salmon Special Harvest Area (WRSHA)

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

Gillnet specifications and operations are unclear for gillnet fisheries in the WRSHA. For example, it is unclear if the Board intended to allow set gillnet CFEC permit holders operate gear seaward, or off shore, of other set gillnet permit holders.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

5 AAC 06.331 defines gillnet specifications and operations in Bristol Bay.

The purpose of this ACR is to reduce misunderstanding by defining in 5 AAC 06.358 which sections of 5 AAC 06.331 do not apply to the WRSHA and by adding language to 5 AAC 06.358 to clarify Board intent. Proposed language is not included at this time to allow the board to determine in the first instance what parts of 5 AAC 06.331 apply in the WRSHA.

Proposed language:

(d) When the Wood River Special Harvest Area is open under this section, the following apply within the open waters:

(1) set gillnets may be operated only as follows:

(A) a set gillnet may not exceed 25 fathoms in length;

(B) a set gillnet may not be set or operated within 150 feet of another set gillnet;

(C) all gear associated with set gillnet fishing must be removed when it is not being used to fish in the Wood River Special Harvest Area;

[(D) SET GILLNET RUNNING LINES MAY NOT BE IN THE WATER DURING A DRIFT GILLNET FISHING PERIOD] removed because it is redundant per (C) of this section.

(E) [additional provisions specifying what provisions of 5 AAC 06.331 apply in the WRSHA]

New language proposed above in 5 AAC 06.358(d)(1)(E) will describe which gillnet specifications and operations listed in 5 AAC 06.331 apply in the WRSHA.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
NA

b) to correct an error in regulation:
Regulations are in conflict and/or unclear.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
It was unforeseen that the regulations would be in conflict and unclear.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
There will be continued confusion and the Board's intent will continue to be unclear.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
This ACR clarifies specifications and operation and applies to all users equally.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
NA

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Law enforcement.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
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Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 06.200(a)

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

It is unclear whether drainages, which include the Wood River Sockeye Salmon Special Harvest Area (WRSHA), are included in the Nushagak District. There are implications on other regulations if drainages and special harvest areas are, or are not in the district. For example, per 5 AAC 06.350(f), salmon may not be taken in any locations that are not described in 5 AAC 06.200. Currently drainages do not appear to be included in 5 AAC 06.200 but there are other places in regulation that infer that they are.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

Amended regulation: 5 AAC 06.200. Fishing districts and sections (a) Nushagak District: all waters of Nushagak Bay**, including drainages,** north of a line from a point at Nichols Hills at 58_ 33.77' N. lat., 158_ 46.57' W. long. to Etolin Point at 58_ 39.37' N. lat., 158_ 19.31' W. long.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
NA

b) to correct an error in regulation:
Click here to enter text. Current regulations are in conflict. The drainages of Nushagak Bay are not described in 5 AAC 06.200 therefore are closed waters based on 5 AAC 06.350(f), this includes the

WRSHA. By including drainages in the definition of 5 AAC 06.200 it will be clear that drainages can be open to commercial fishing, it will also clarify the application of other related regulations.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
Click here to enter text.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
Continued confusion about how to apply regulations when the WRSHA is open.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
This ACR simply clarifies that the WRSHA is within the Nushagak District and does not change allocations in any way.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
NA

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Law enforcement.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
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Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 01.210.(e)

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

This is a twin proposal that will be in front of the YKRAC and Federal Subsistence Board. I would like for this to be considered at the same time as the Federal Subsistence Board to act. That way this will limit the confusion of State versus Federal regulations. Thank you, Alissa:

These closures do not prevent people from selling into the commercial fishery Chinook Salmon that they take in the subsistence fishery because only a few Yukon subsistence fishermen do this. There are always going to be a few bad actors, we know who they are, they have been fined before, and this regulation doesn't stop them. This regulation is burdensome on subsistence fishermen without any benefit.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

Delete the regulation.

5 AAC 01.210. Fishing seasons and periods

(e)(1) in Districts 1, 2, and 3,

~~*(A) after the opening of the commercial salmon fishing season through July 15, salmon may not be taken for subsistence for 18 hours immediately before, during, and for 12 hours after each commercial salmon fishing period;*~~

~~*(B) after July 15, salmon may not be taken for subsistence for 12 hours immediately before, during, and for 12 hours after each commercial salmon fishing period;*~~

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more

of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:

This was a generated proposal that was supposed to be submitted prior to the deadline, but do to human or computer error a duplicated of another submitted proposal was selected instead of this proposal. Reasons, can't be exact.

Qualified reasons: This proposal will be going in front of the Federal Subsistence Board to take action. I would like this proposal to be considered for this Board of Fish cycle to it's "twin" through the federal system. That we don't cause more confusion if this was to be one or the other of either state or federal regulations.

This proposal is to be put in, because there is a burdensome regulation that is no longer needed due to the rise in Chinook salmon numbers that is expected to continue to rise over the next 2 decades or more. Due to the heavy restrictions on the Chinook Salmon, I believe it is safe enough to relax the restrictions back for simplicity.

We already know that this tool was an effective tool for subsistence versus commercial fishing during times of Chinook conservation, it should be added to the Yukon Management tools. That way managers can use this as a tool when needed versus mandatory on a yearly basis.

b) to correct an error in regulation:

This could be changed to a management too instead of a mandatory regulation, now that we are on the incline of Chinook Salmon returns and will be on the incline for the next 2-3 decades. All thanks to the heavily restricted years where subsistence and commercial fishing for Chinook salmon was used and used effectively.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

There was no intention that this tool was going to be used perpetuity "or forever", this tool was a try-out tool that worked effectively on the behalf of commercial buyers.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

This tool will continue to be burdensome and could incur unnecessary violations during a good year of Chinook Salmon returns. I do not foresee that this tool will be used again, unless we have a major environmental disaster or over harvest of Chinook Salmon, regardless of what harvest stage of growth the Chinook cycle.

It is better to use regulations that are effective. That these tools are made readily available in the management tools. In support of "not to cause" unnecessary mandatory regulation that could potentially cause more conflict and trouble than they are worth in the long run.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

This was supposed to be in with the other 6 proposals, but it was accidently mis-submitted by computer or human error during time of deadline. This proposal will be in front of the Federal Board as well and I would like this proposal to coincide with the twin proposal.

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

I commercial fish on the Yukon River when possible and when budget deems more profitable as a commercial fisherman. I also subsistence fish on the Yukon River as well as many family members do too.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.

No, this has not been considered before. I would appreciate the consideration for this proposal to become a board generated proposal due to the time sensitivity and "twining" with the Federal Board proposal.

Submitted by:

NAME Alissa Nadine Rogers
Individual or Group

P.O. Box 2405	Bethel, Alaska	99559
Address	**City, State**	**Zip**

907-306-4345		alissa.n.rogers@gmail.com
Home Phone	**Work Phone**	**Email**

SIGNATURE: Electronic Signature: Alissa. Nadine Rogers **DATE: 15 August, 2018**

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

Chignik Advisory Committee

Chignik Advisory Committee
c/o Raechel Allen, Secretary
P.O. Box 84
Chignik, AK 99564

October 1, 2018

Executive Director Glenn Haight
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bog.comments@alaska.gov

Dear Alaska Board of Fisheries Director, Chairman and Members:

The Chignik Advisory Committee (AC) submitted a timely Agenda Change Request (ACR) which the Board of Fisheries elected not to consider at its October 15 – 16 work session. That ACR is attached for your reference.

We understand that the Board considered the ACR to be an in-cycle proposal, and therein so elected not to accept the Chignik's ACR, although in the past the Board has taken action on similar proposals. The reason the Chignik ACR was submitted was due to the complete failure of both Chignik's two sockeye salmon runs this year and in recognition that the Shumagin Island and South Unimak fishery is only regulated by time and area without any provision for resource stewardship on Chignik and other migratory sockeye salmon stocks that for all practical purposes exclusively support this fishery in June, July, and early August. Furthermore, early indications suggest that it is likely that next year will be a poor Chignik sockeye year as well.

A reasonable level of protection and accountability in this fishery is needed for conservation and for an equitable distribution of available harvest between management areas. We understand that one likely justification for the Board's action to not take up the ACR is that it will have full latitude to address any and all regulatory issues pertaining to the Area M fisheries during its in-cycle meeting in February 2019 regardless of the printed proposals in the proposal book.

By making this public comment, the Chignik Advisory Committee respectfully puts the public on notice that this proposal is open for consideration by the BOF even though it is not officially in the proposal book. And although the Chignik ACR is not on the agenda for the Board's October work session, there is nothing preventing a Board of Fisheries member from making a motion at the October meeting to create a board generated proposal that encompasses the proposed regulatory change recommended in the Chignik ACR.

Thank you for your serious consideration of the issues raised by our Agenda Change Request.

Most sincerely,

Raechel Allen

Raechel Allen, Chignik Advisory Committee Secretary

AGENDA CHANGE REQUEST FORM
ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept these agenda change requests (ACRs) only:

1) for a fishery conservation purpose or reason; or
2) to correct an error in regulation; or
3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 5AAC 09.365 (South Unimak and Shumagin Island June Salmon Management Plan) & 5AAC 09.366 (Post-June Salmon Management Plan for the South Alaska Peninsula)

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

The current disastrous sockeye salmon season in Chignik shows that there is inadequate sharing of the burden of conservation in the South Peninsula and, most notably, in the Shumagin Islands fishery. In particular, there are no windows during which there is no commercial fishing gear in the water during the June 7 - 30 time-period to allow reasonable opportunity for non-local sockeye stocks to pass to their terminal streams.

The Board's July 2018 emergency regulations related to this fishery were highly appreciated and well considered, but did not efficiently or effectively deal with a reasonable sharing of conservation burdens when Chignik stocks need protective measures in Area M waters. Chignik's sockeye early and late run need protective measures in Area M waters most especially in the Shumagins Islands fishery. Board action on this front would be reasonable at this time given the failed 2018 Chignik sockeye runs and the Board's adopted Policy for the Management of Sustained Salmon Fisheries (5 AAC 39.222). While this is an in-cycle issue the issue may very likely not be adequately addressed by the current proposals because the 2018 salmon season had not yet occurred, which highlighted an obvious deficiency in the current South Alaska Peninsula management plans.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

Requested is a three-part approach: Part 1 amends the June management plan by establishing concurrent fishing for all gear types with windows during which fishing is closed to all gear types (See Figure 2). Part 2 is triggered if commercial harvests in Chignik are not likely to meet minimum requirements similar to the current Cape Igvak and Southeast District Management Plans (See Figures 3 & 5). Part 3 is triggered if escapement goals are not achieved in Chignik. The regulatory language would be as follows:

5 AAC 09.365 – South Unimak and Shumagin Islands June Salmon Management Plan

(a) ***amend to read:*** The South Unimak and Shumagin Islands June fisheries harvest both sockeye and chum salmon in a mixed stock fishery during June. The sockeye salmon are predominately west-bound Bristol Bay, and east-bound Chignik and other stocks including Upper Cook Inlet and Kodiak fish. South Alaska Peninsula stocks are a minor component. The chum salmon are bound for a number of areas, including Japan, Russia, the Arctic-Yukon-Kuskokwin, Bristol Bay, and Alaska Peninsula, and southcentral Alaska. These stocks have historically been harvested along the south Alaska Peninsula during June. The management plan is intended to be consistent with the Policy for the Management of Sustained Salmon Fisheries (5 AAC 39.222) and the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220).

(g) ***add to read:*** Notwithstanding (d) (1)(A)(B) and (d)(2)(A)(B) in the South Central District, Volcano Bay Section of the Southwestern District, and the Southeastern District except as provided in the Southeastern District Mainland Salmon Management Plan under 5 AAC 09.360, the seine and gillnet fisheries will run concurrently and begin on June 10 at 00:00 hours and run 72 hours until 24:00 hours two days later; commercial fishing will then close for 72 hours; subsequent fishing periods will begin at 00:00 hours three days later and run for 72 hours until 24:00 hours two days later; commercial fishing will then close for 72 hours; the final fishing period will end at 24:00 hours (midnight) on June 30.

(h) ***add to read:*** Notwithstanding (g) beginning on June 16, if the Department projects that less than 300,000 sockeye salmon will be harvested in the Chignik Management Area (as described in 5 AAC 15.100) by July 7, fishing periods in South Central District, Volcano Bay Section of the Southwestern District, and the Southeastern District except for the Southeastern District Mainland will begin at 00:00 hours and run 36 hours until 12:00 hours the next day; commercial fishing will then close for 108 hours; subsequent fishing periods will begin at 00:00 hours five days later and run for 36 hours until 12:00 hours the next day; the final fishing period will end at 24:00 hours (midnight) on June 29.

(i) ***add to read:*** Notwithstanding any other provision of this section, if the Department projects that Chignik's early sockeye salmon run escapement goal will not be achieved, all commercial salmon fishing periods in the South Central District, Volcano Bay Section of the Southwestern District, and the Southeastern District except for the Southeastern District Mainland, are suspended until escapement is reached.

5 AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula

(a) ***amend to read:*** The purpose of this management plan is to provide management guidelines to the department for the management of the post-June salmon fisheries along the South Alaska Peninsula, to provide for the harvest of local stocks in terminal harvest areas, identify that non-local sockeye salmon stocks are intercepted including Chignik-bound sockeye salmon, and provide for both Chignik escapement and a Chignik harvest preference in the non-terminal harvest areas of the South Alaska Peninsula in the South Central District, Volcano Bay Section of the Southwestern District, and the Southeastern District salmon except as otherwise provided in the Southeastern District Mainland Salmon Management Plan under 5 AAC 09.360, and to establish fishing periods for the South Alaska Peninsula salmon fisheries outside of terminal harvest areas.

(k) ***add to read:*** Notwithstanding (c)(1) and (c)(2), (d)(1),(d)(2), and (c)(2), from July 6 through August 8 in the South Alaska Peninsula South Central District, Volcano Bay Section of the Southwestern District, and the Southeastern District salmon fisheries except as otherwise provided in the Southeastern District Mainland Salmon Management Plan in 5 AAC 09.360, if less than 300,000 sockeye salmon have been projected to be harvested by July 7 in the Chignik Management Area (as described in 5 AAC 15.100) and after July 8 if the Department projects that less than 600,000 sockeye salmon will be harvested in those same waters, commercial fishing periods will begin on July 6 at 06:00 hours and run for 18 hours until 00:00 hours. the next day; commercial fishing will then close for 78 hours; subsequently fishing periods will begin at 06:00 hours and run for 18 hours until 00:00 hours the next day; commercial fishing will then close for 78 hours and reopen at 06:00 hours three days later. Commercial salmon fisheries in designated terminal harvest areas per 5 AAC 09.366 (f) (1) are excluded from 5 AAC 09.366 (k) provisions.

(l) ***add to read:*** Notwithstanding any other provision of this section, from July 6 through August 8 in the South Alaska Peninsula South Central District, Volcano Bay Section of the Southwestern District, and the Southeastern District salmon fisheries except as otherwise provided in the Southeastern District Mainland Salmon Management Plan in 5 AAC 09.360, if Chignik sockeye escapement goals are not being met, all commercial salmon fishing is suspended until escapement levels are reached. However, commercial salmon fisheries in designated terminal harvest areas per 5 AAC 09.366 (f) (1) are excluded from 5 AAC 09.366 (l) provisions.

Figure 1: CURRENT REGULATIONS
June 2018 Shumagin Is. Section & Southcentral District Fishing Schedule by Gear Type

Gear	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Type						1	2
Seine	Notice that under current regulations that between June 7 and June 30 that there are alternating overlapping openings for Set net and seine gear so that there are never any windows of closure for both gear typles for fish to pass through to their terminal streams.						
Set Gillnet							
	3	4	5	6	7	8	9
Seine							
Set Gillnet							
	10	11	12	13	14	15	16
Seine							
Set Gillnet							
	17	18	19	20	21	22	23
Seine							
Set Gillnet							
	24	25	26	27	28	29	30
Seine							
Set Gillnet							

Figure 2: Proposed Concurrent Fishing periods for Seine & Set net
June Shumagin, Southcentral & Southeastern District Fishing Schedule

Gear	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Type						1	2
Seine	This Calendar shows an example of the original windows made in 1984 (not to exceed 96 Hrs per week and not more than 72 consecutive hrs.) that ran in conjunction with 1.5% GHL of Bristol Bay Harvest. We are not asking for any GHL or Chum caps and the justification is to return to this windows scenario to correct the unintended over harvest on Area L sockeye stocks.						
Set Gillnet							
	3	4	5	6	7	8	9
Seine							
Set Gillnet							
	10	11	12	13	14	15	16
Seine							
Set Gillnet							
	17	18	19	20	21	22	23
Seine							
Set Gillnet							
	24	25	26	27	28	29	30
Seine							
Set Gillnet							

Figure 3: A Reduction of approx. 50% after June 15 is Triggered if Chignik Harvest Allowance not acheived
June Shumagin Is. Section & Southcentral District Fishing Schedule

Gear	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Type						1	2
Seine	When minimum harvest preferences similar to what occurs at Cape Ivgak and SEDM are not acheiveable then the more restrictive windows below are triggered. Note that this would have no impact on the Unimak District and all Area M gear types have access to this area, and is only triggered when Chignik's 300k, 600k harvent allowance is not considered acheivable.						
Set Gillnet							
	3	4	5	6	7	8	9
Seine							
Set Gillnet							
	10	11	12	13	14	15	16
Seine							
Set Gillnet							
	17	18	19	20	21	22	23
Seine							
Set Gillnet							
	24	25	26	27	28	29	30
Seine							
Set Gillnet							

Figure 4: Current Regulations
July 2018 Shumagin Is. Section & Southcentral District Fishing Schedule by Gear

Gear	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Type	1	2	3	4	5	6	7
Seine							
Set Gillnet							
	8	9	10	11	12	13	14
Seine							
Set Gillnet							
	15	16	17	18	19	20	21
Seine							
Set Gillnet							
	22	23	24	25	26	27	28
Seine							
Set Gillnet							
	29	30	31				
Seine							
Set Gillnet							

Figure 5: Proposed Reduction is Triggered if Chignik Harvest Allowance not achieved
July Shumagin Is. Section & Southcentral District Fishing Schedule by Gear

Gear	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Type	1	2	3	4	5	6	7
Seine							
Set Gillnet							
	8	9	10	11	12	13	14
Seine							
Set Gillnet							
	15	16	17	18	19	20	21
Seine							
Set Gillnet							
	22	23	24	25	26	27	28
Seine							
Set Gillnet							
	29	30	31				
Seine							
Set Gillnet							

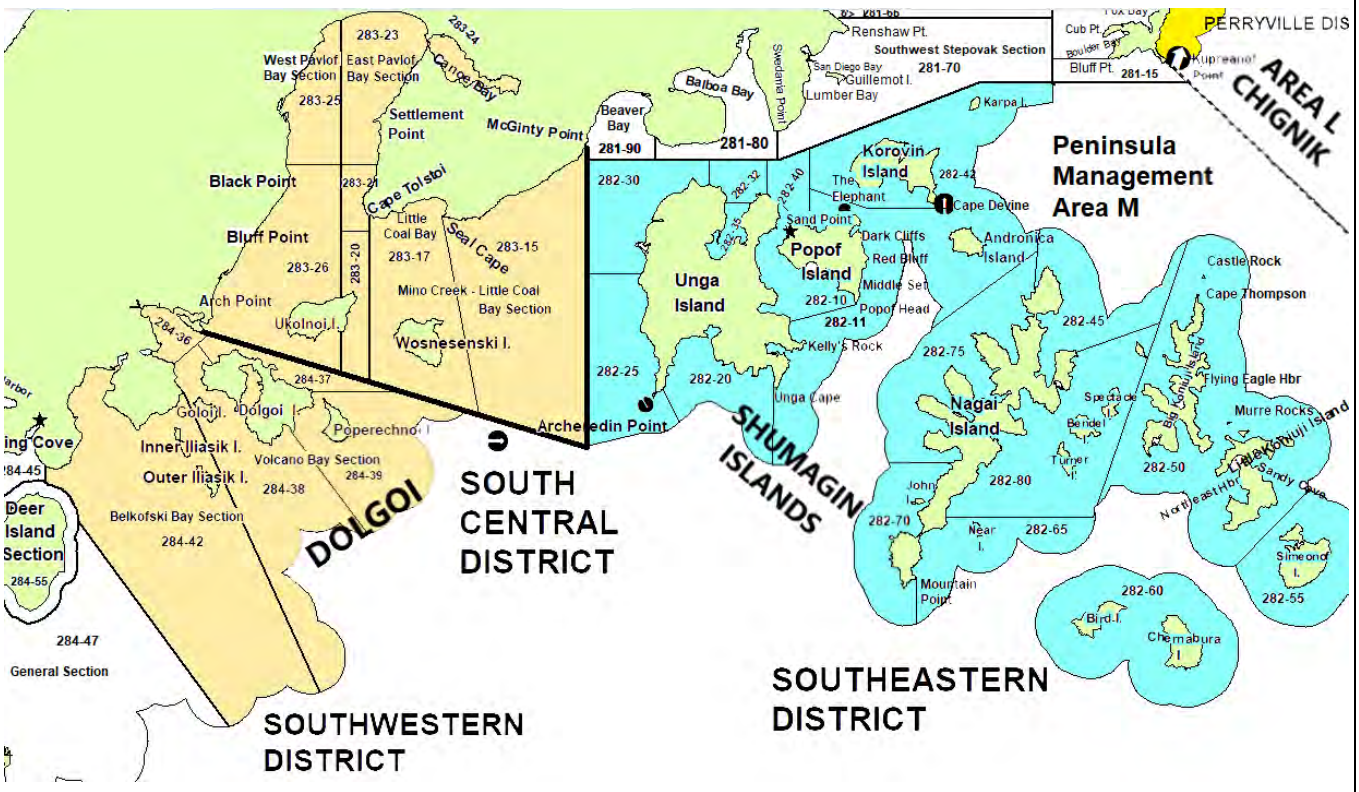

Figure 6: This Map shows the areas in the South Peninsula of Area M where major numbers of Chignik-bound sockeye are highly vulnerable to harvest before they can reach Chignik (Area L) waters.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:

In 2018 there has been no Chignik sockeye fishery and the likelihood of any local-stock alternative salmon fisheries occurring this season is dubious at best. Chignik's early (Black Lake) and late (Chignik Lake) sockeye runs have failed; both runs are substantially below escapement objectives. It is well known that Chignik sockeye have significantly contributed to the South Peninsula fishery in 2018, based on WASSIP data alone (see table below), particularly in the Shumagin Islands where there is no conservation tie limiting the harvest of Chignik-bound salmon or on any other non-local salmon stocks either in June or July. Local South Peninsula Sockeye stocks comprise less than 1% of the sockeye harvested in the South Peninsula. Note also that if WASSIP data had been collected and analyzed for 2018 that it would show virtually 100% of the harvest of Chignik sockeye being harvested in the South Peninsula of Area M. In accordance with the Policy for the Management of Sustained Salmon Fisheries (5 AAC 39.222) it is most warranted that the BOF instate a conservation assignment on the South Alaska Peninsula interception fishery to provide a level of protection and assurance of sustainability on Chignik bound sockeye salmon.

Table 1: Where Chignik bound Sockeye Stocks are Harvested according to WASSIP
Black Lake and Chignik Lake Harvest and Harvest Rates
Derived from Appendix F64 of the report on the Western Alaska Salmon Stock Identification Program (WASSIP)

2006			2007			2008		
Black Lake Harvest & Harvest Rates			Black Lake Harvest & Harvest Rates			Black Lake Harvest & Harvest Rates		
Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest
Chignik Area	536,085	55%	Chignik Area	235,768	76%	Chignik Area	254,458	77.3%
South Pen of Area M	444,645	45%	South Pen of Area M	73,004	24%	South Pen of Area M	74,491	22.6%
All Other WASSIP	-	0%	All Other WASSIP	-	0%	All Other WASSIP	175	0.1%
Total	980,730	100%	Total	308,772	100%	Total	329,124	100%
Chignik Lake Harvest & Harvest Rates			Chignik Lake Harvest & Harvest Rates			Chignik Lake Harvest & Harvest Rates		
Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest
Chignik Area	335,201	57%	Chignik Area	510,660	75.8%	Chignik Area	373,841	71.7%
South Pen of Area M	247,568	42%	South Pen of Area M	161,223	23.9%	South Pen of Area M	147,271	28.3%
All Other WASSIP	549	0%	All Other WASSIP	1,712	0.3%	All Other WASSIP	0	0.0%
Total	583,318	100%	Total	673,595	100%	Total	521,112	100%
Total Chignik Harvest & Harvest Rates			Total Chignik Harvest & Harvest Rates			Total Chignik Harvest & Harvest Rates		
Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest
Chignik Area	871,286	55.7%	Chignik Area	746,428	76.0%	Chignik Area	628,299	73.9%
South Pen of Area M	692,213	44.3%	South Pen of Area M	234,227	23.8%	South Pen of Area M	221,762	26.1%
All Other WASSIP	549	0.0%	All Other WASSIP	1,712	0.2%	All Other WASSIP	175	0.0%
Total	1,564,048	100%	Total	982,367		Total	850,236	100%

b) to correct an error in regulation:
Not Applicable.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
When the current regulations for the South Peninsula of Area M were instated it was unforeseen that Chignik's first and second runs of sockeye salmon would ever be impacted to where escapements would not be reached or that there would be zero harvest opportunity for Chignik fishermen. It is known that Chignik bound sockeye stocks are harvested in the South Peninsula in significant numbers based on WASSIP, and were it foreseen that Chignik escapements might not be met on some years, expectedly the Board would have assigned a conservation requirement on Chignik sockeye salmon in Area M's South Peninsula fisheries. Because neither the Board nor the Department foresaw this problem, this ACR is necessary.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
Not Applicable

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
It is not predominately allocative. This ACR is primarily about sharing the burden of conservation by ensuring that reasonable escapements and minimum harvest opportunities occur in Chignik.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
This question is not applicable because while the request has allocative aspects, the proposal is actually in-cycle but possibly different than proposals that may have been submitted. The issue of the public having to deal with allocative issues out of cycle is not raised.

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.) Chignik Advisory Committee
9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING. No

Submitted by:

NAME Chignik Advisory Committee
Individual or Group

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Home Phone	**Work Phone**	**Email**

SIGNATURE: _____ **DATE:** August 14, 2018
Jacob Shangin, Chignik Advisory Committee Chairman

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
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P.O. Box 115526
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Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

AGENDA CHANGE REQUEST FORM – Nushagak River Coho Salmon Management Plan
ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept these agenda change requests (ACRs) only:

1) for a fishery conservation purpose or reason; or
2) to correct an error in regulation; or
3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)]. Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: **06.368 Nushagak River Coho Salmon Management Plan**

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

The current management plan for Coho salmon in the Nushagak district unnecessarily precludes harvest opportunities to all gear groups during times of healthy runs.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

Amend 06.368, Nushagak River Coho Salmon Management Plan, to allow for additional opportunity when the department determines in-season that the sustainable *escapement goal* range of 60,000-120,000 will be met.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
Click here to enter text.

b) to correct an error in regulation:
In 2015 ADFG recommended a change to the Coho escapement goal from a point goal to a SEG range (60,000-120,000). The upper limit on the new range was used as the in-season trigger to either close or allow for opportunity in the Coho fishery (5AAC 06.368 (c)). This change is more restrictive than using the old point goal of 100,000, and, technically, permits fishing only if the range is expected to be exceeded. The management goal should be to fall within an escapement goal range and not beyond it, otherwise the range is meaningless. As a result, the change in 2015 precludes fishing opportunity in a year of normal and fishable abundance.

While adjusting the regulation, it would be worthwhile examine and possibly adjust the August 1 trigger. Currently, ADFG is to project the total Coho run on August 1, which historically is the first quartile point (25%) in a year of average run timing. In recent years the run timing has been skewed later which means ADFG is being asked to project the total run with less than 25% of the run accounted for by August 1. If the annual escapement is projected to be less than 120,000 (i.e., by August 25) the commercial fishery must close, and the in-river sport and subsistence fisheries would likely be restricted. The August 1 trigger is unnecessarily constraining given a sometimes-low portion of the return to the district by that date, and the time remaining to meet an escapement goal should more escapement be needed.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
THE SAME RATIONALE FROM (b) CAN BE USED FOR THIS CRITERIA IF THAT IS PREFERRED.
Yes. See (b) above.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Loss of potential harvest opportunity provided from robust and fishable Coho salmon runs by all user groups for the next 3 years.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

All of the users (commercial, sport and subsistence) will potentially benefit from increased access to the resource through the BOF's deliberative process.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
N/A

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Commercial fisherman

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.

Board of Fisheries deliberations on the Nushagak River Coho Salmon Management Plan occur sporadically based on the tri-annual board cycle. In 2015, the BOF made several changes to the plan including changes to the SEG based on ADFG input. Currently there are no proposals submitted for the upcoming 2018 BB BOF meeting that will be held in Dillingham.

Submitted by:
NAME ROBERT HEYANO
Individual or Group

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Address	**City, State**	**Zip**
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Home Phone	**Work Phone**	**Email**

SIGNATURE: Robert Heyano **DATE:** 8/14/2018

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

FAX COVER SHEET

DATE: 7/29/08

FROM: COMSULT LLC **FAX NUMBER: 1-907-345-4715**

TO: ADF&G, Juneau, AK

COMPANY: Susan Dye,

FAX NUMBER: _____

SUBJECT: KUSKOKWIM RIVER

NOTES:

Working with others to support this action -

FROM: RODGER DAVIS, CELL: 1-907-351-2436

FROM: _____ **CELL:** _____

AGENDA CHANGE REQUEST FORM
ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept these agenda change requests (ACRs) only:

1)for a fishery conservation purpose or reason; or

2)to correct an error in regulation; or

3)to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: (unknown/ conservation of resource issue)

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

I have fished and owned property on the Iliamna River for more than 45 years. I pushed hard for restrictions on sport fishing on the river approximately 30 years ago when rainbow and char populations declined to the point of risking the spawning stocks. Beginning in 2014 I noticed a decline in fish stock again. Sport fishing pressure on the short river had more than doubled in the previous two years. Since then, the pressure has doubled again and "trout" stocks have collapsed. We've declined from rows of char and trout across every ripple to schools holding only in deep pools over the last four years. Virtually every large spawning size fish had torn mouths or eyes. This year the fish in the pools are gone. Worse, there are no "schoolies" or small fish feeding on insects on the flats. Whereas, in four hours of fishing for two people just two years ago would lead to at least a dozen "hookups," this year it might produce one. If you do find a spot holding fish, the next day you will find a dozen fishermen at that spot, the guides trying to get their clients anything. The next day those few fish are dispersed.

The fish counts today are a fraction of those when ADF&G took action three decades or so ago. THE RAINBOW AND ESPECIALLY THE CHAR STOCKS HAVE DISAPPEARED.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

This river should be closed to fishing for "trout" or some form of aggressive limited entry should be instituted until a study of the collapse of the stocks can be completed and remediation plans can be both implemented and successful.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:

The "trout" meaning both rainbow and char stocks in the Iliamna River have collapsed. Without immediate and drastic cutbacks to pressure and a solution to what may yet be determined problems

to the fishery, it will never recover.

b)to correct an error in regulation:

N/A

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

Catch and release, even with as little as a three percent mortality, cannot rebuild stocks. That is what the regulation is now, and is the rule we have followed to this collapse.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

This river will never again be a significant sport fishery.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
Everyone needs to act in a manner to preserve the resource.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
N/A

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
I certainly was not the first to fish this river, but I put the first jet boat on the river more than four decades ago and have historically fished the river more than 45 days a year. My children and grandchildren own property and fish the river. I probably know it as well or better than anyone in Alaska. I hate the idea of the Iliamna River being closed to fishing, especially since I probably have only a few more years available to enjoy it, but am more concerned with the resource and what we leave for our grandchildren.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
Not to my knowledge

Submitted by:
NAME Rodger C. Davis

Individual or Group

8000 Upper DeArmoun Road,	Anchorage, Alaska.	99516
Address	**City, State**	**Zip**
(907) 345-0749	cell (907) 351-2436	rodger1948_@hotmail.com
Home Phone	**Work Phone**	**Email**

SIGNATURE: Rodger C. Davis **DATE:** July 29, 2018

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
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Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

AGENDA CHANGE REQUEST FORM
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1) for a fishery conservation purpose or reason; or
2) to correct an error in regulation; or
3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 5AAC 06.368 (c)

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

The regulation as currently written directs the department to manage for above the escapement range rather than within the escapement range, and unnecessarily restricts users.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

(c) If the total inriver coho salmon return in the Nushagak River is projected by the department to be [LESS THAN 120,000 BUT AT LEAST 70,000 FISH] **less than 70,000 fish** by August 25, the commissioner shall close, by emergency order, the directed coho salmon commercial fishery in the Nushagak District by August 1; and
(1) repealed 4/16/2016;
(2) the commissioner may restrict, by emergency order, the coho salmon sport fishery in the Nushagak River drainage upstream from the department sonar counter located near the village of Portage Creek so that the harvest does not exceed 2,000 coho salmon by one or more of the following:
(A) reduce the bag and possession limit;
(B) prohibit the use of bait;
(C) restrict fishing times and areas;
(D) restrict terminal tackle to single-hook artificial lures; and
(E) allow catch-and-release fishing only;
(3) it is the intent of the board that the lower the projected inriver coho salmon return is, the more restrictive that management measures will be in the sport and commercial fisheries under this section.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:

Not applicable

b) to correct an error in regulation:

This appears to be an error in regulation. I believe this happened when the department went from a point escapement goal to a range escapement goal. I think it was intended that this be managed within the range rather than above the range. There is not regularly funding to count Coho. Closures due to Coho being counted this season have recently brought the issue to my attention.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

Not applicable.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Unnecessary restrictions limit practical use of the resource for all users, and cause processors to leave the area early. If not corrected by ACR we will have three more seasons of possible lost opportunity before the next call for proposals is issued by the board.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

This ACR is not predominately allocative. Currently all users are penalized when projections fall below the top end of the range.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

Not applicable

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)

I participate in the commercial fishery in the Nushagak District and direct market Coho.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.

I am not aware of any prior proposals or ACRs on this subject.

Submitted by:

NAME Tom O'Connor

Individual or Group

P.O. Box 546 | Dillingham, AK | 99576

Address | **City, State** | **Zip**

907-842-2720 | 907-843-0587 (cell) | kingfisherhouse@hotmail.com

Home Phone | **Work Phone** | **Email**

SIGNATURE: Tom O'Connor **DATE:** 8/8/18

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
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Juneau, AK 99811-5526

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1) for a fishery conservation purpose or reason; or
2) to correct an error in regulation; or
3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: **27.810. Fishing seasons and periods for Bristol Bay Area.**

2) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

The current season does not allow for herring to adequately spawn prior to the season opener.

3) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?

5 AAC 27.810. Fishing seasons and periods for Bristol Bay Area.

(a) In the Togiak and Bay Districts, herring may be taken by purse seines and hand purse seines from **April 25** [April 15] through June 1.

(b) In the Togiak and Bay Districts, herring may be taken by gillnets from **April 25** [April 15] through June 1.

4) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED BELOW. If one or more of the three criteria set forth below is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:
Later openers will allow for the herring to spawn and produce more for generations to come.

b) to correct an error in regulation:
Click here to enter text.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:
Click here to enter text.

5) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?
There has been a gradual decrease of roe on kelp in the area. Traditionally a subsistence source for the region. Traditional uses have always put a balance on harvesting and preservation for generations to come.

With this decrease, there were little or none harvested in the last few years. Allowing the herring to spawn on kelp with a later opener, will serve a purpose to preserve the herring for future of both commercial and subsistence activities.

6) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.
This ACR does not state how much is to be harvested nor does it state which area to be harvested.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.
N/A

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g., commercial fisherman, subsistence user, sport angler, etc.)
Tribal Administrator, and subsistence harvester.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.
N/A

Submitted by:

NAME Traditional Council of Togiak
Individual or Group

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Address	**City, State**	**Zip**
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Home Phone	**Work Phone**	**Email**

SIGNATURE: _____ **DATE:** **08-15-2018**

Note: Addresses and telephone numbers will not be published.

Mail, fax, or e-mail this completed form to:
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P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

E-mail: dfg.bof.comments@alaska.gov

Grayling Anvik Shageluk Holy Cross Fish and Game Advisory Committee

Interior Region
Fish and Game Advisory Committees

Ken Chase
Chairman
PO Box 41
Anvik, AK 99558

Central
Delta Junction
Eagle
Fairbanks
GASH
Koyukuk River
McGrath
Middle Nenana River
Middle Yukon River
Minto-Nenana
Ruby
Tanana-Rampart-Manley
Upper Tanana/Fortymile
Yukon Flats

September 24, 2018

At the July 17th teleconference, the Board of Fisheries approved an emergency petition from the Tribal Chiefs of the Native Villages of Grayling, Anvik, Shageluk, and Holy Cross that asked regulations to be amended to allow for drift fishing after August 2nd in Subdistrict 4A. Your board approved this change, but the change was only for this season.

Since the Arctic Yukon Kuskokwim meeting is January of 2019, I am aware that an Agenda Change Request submitted to your board on this subject will be rejected. I would then like to ask that your board consider creating a board generated proposal about this so that comments can be gathered from the public and the local advisory committees to allow drifting after August 2nd in Subdistrict 4A.

Please note I am writing this letter as the chairman of the Grayling Anvik Shageluk and Holy Cross Fish and Game Advisory Committee but the committee did not endorse this letter since the emergency petition came out in the summer and our committee does not typically meet in the summer.

Thank you for your time,

Ken Chase

Matanuska-Susitna Borough

October 3, 2018

AK Department of Fish & Game
Boards Support Section-BOF
PO Box 115526
Juneau, AK 99811-5526
(Submitted via email)

RE: August Central District Gillnet Opening

Chair John Jensen	Reed Morisky	Orville Huntington	Fritz Johnson
Alan Cain	Israel Payton	Robert Ruffner	

Under provisions of the Central District Drift Gillnet Fishery Management Plan (5 AAC 21.353), the Commercial Fisheries Division announced an opening for the drift fleet on August 23, 2018. The management plan specifically states that for any commercial drift fleet opening from August 16 until closed by emergency order, only Drift Gillnet Areas 3 and 4 are open for fishing [5 AAC 21.353 (f)]. A description of these areas is contained in regulation [5 AAC 21.353 (g) (3 and 4)], but essentially moves the fleet over to the west side of Cook Inlet.

The announced August 23 opener contained an added provision stating that the fleet could also fish in Drift Area 1 [5 AAC 21.353 (g) (1)], which includes all waters of the Central District south of Kalgin Island. This is a major expansion of the Board of Fisheries (BOF) specified allowable fishing area for this period.

According to ADF&G records, there were 29 deliveries with over 70% of the fish being silver salmon. The original announcement suggested that the purpose of the opener was to "mop up" sockeye salmon, since escapement goals for both the Kenai and Kasilof Rivers had been met.

The management plan contains a clause, [5 AAC 21.353 (h)], which states, "The commissioner may depart from the provisions of the management plan under this section as provided in 5 AAC 21.363 (e)," which is the Upper Cook Inlet Salmon Management Plan.

That subsection (e) states, in part, "...no provision within a specific management plan is intended to limit the commissioner's use of emergency order authority under AS 16.05.060 to achieve established escapement goals for the management plans as the primary management objective. For the purpose of this subsection, "escapement goals" include in-river goal, biological escapement goal, sustainable escapement goal, and optimal escapement goal as defined in 5 AAC 39.222."

John M. Moosey * Borough Manager * 350 E. Dahlia Avenue * Palmer, AK 99645
907.861.8689 * john.moosey@matsugov.us

Since there were no significant escapement goal concerns regarding either the Kenai or Kasilof Rivers, the Matanuska-Susitna Borough Fish and Wildlife Commission (MSBFWC) questions why the ADF&G, Commercial Fisheries Division decided to assume allocative authority by allowing one gear type to fish in an area the BOF clearly had designated as an area off-limits during the time period of the opener.

The BOF exerts their allocative authority in the management plans by designating areas and times when different gear groups can harvest fish. The department clearly used that same mechanism in expanding the August 23 opener where fishing could occur when ADF&G had no allocative authority to do so.

While the real-world results of this opener probably did little or no harm to the fisheries resource, the precedent of the department assuming authority to allocate fisheries resources by over-riding BOF-established management plans, when the intent of the board in granting ADF&G this ability is not met, is troubling.

The MSBFWC would appreciate a clear and detailed explanation from the department as to why they chose to assume allocative authority during this opener without, at least, consulting with the BOF prior to making the announcement.

Further, the MSBFWC is considering advocating an amendment to 5 AAC 21.363 (e) to insert the words "the lower levels" so that the regulation would then read "to achieve the lower levels of established escapement goals for the management plans as the primary management objective." The result obviously would maintain the commissioner's emergency order authority but restrict it to protecting the lower returns but not to be used in an allocative manner at the higher escapement levels. We would welcome the department's feedback on what impact such an amendment would have.

Sincerely,

John M. Moosey
Borough Manager

John M. Moosey * Borough Manager * 350 E. Dahlia Avenue * Palmer, AK 99645
907.861.8689 * john.moosey@matsugov.us

Submitted By
Stafford Glashan
Submitted On
8/16/2018 10:01:45 AM
Affiliation

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7609 N. Grouse Loop
Wasilla, Alaska 99654

I have been fishing the Mat-Su valley for 24 years. Mostly the Parks streams but also the Little Su. I have noticed a decline in the numbers of returning salmon, especially in the Parks Highway streams. I believe that part of this decline is due to a lack of ADF&G presence at these rivers. In all my years of fishing I have only had my license checked twice, both on the Little Su. Enforcement of fishing rules (primarily snagging) is largely done by citizens shaming the offender. For all but the most egregious rule breaking, the response time from ADF&G/Troopers is seen as too long (and with only 2-3 troopers on duty in the area there is usually something more pressing for them.

In addition to more ADF&G presence I would like to see a rule change to require treating all salmon the same as Coho. Only fish that are going to be retained should be removed from the water. I have to believe that the mortality rate on the other salmon removed from the water is similar to what has been observed in Coho studies. I regularly see pinks and chums brought up on the bank and unceremoniously kicked back into the water. I believe this is unethical and harmful to the fishery.

Submitted By
Robert Jahnke
Submitted On
10/1/2018 12:46:56 PM
Affiliation

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Email
bobkrisktn@kpunet.net
Address
PO Box 991
Ward Cove, Alaska 99928

I would like to see the next BOF meeting [2021] held here in Ketchikan. We need the origonal 1E boundry line , survey pt. to cammano pt. put back to use regarding guided sport retention and hook and release during May & June to protect the Unuk river kings. With over a million cruise visiters stopping here in the late spring and summer the mortality rate on our king salmon is thru the roof. It may be too late by 2021 but at least residents in Ketchikan may have a better say in these matters.

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Office: (907) 822-3476
Fax: (907) 822-3495

Ahtna, Incorporated

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Office: (907) 868-825
Fax: (907) 868-828

Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

October 1, 2018

Alaska Boards of Fisheries
PO Box 115526
Juneau, Alaska 99811-5526

To Alaska Boards of Fisheries:

Attached is Ahtna Tene Nene' comments on JB ACR 1.

Comments:

Ahtna Tene Nene' oppose JB ACR 1. In 1992, the Joint Boards made a determination about nonsubsistence areas. The Board of Fisheries has the authority to make CT determinations for fish stocks outside the nonsubsistence areas. The Board made a positive CT finding in 1999 for the Chitina Subdistrict salmon fishery. Board reversed its decision in 2003 to negative CT determination for the Chitina Subdistrict fishery.

Members of the Alaska Board of Fisheries did not determine Chitina Subdistrict to be a non-subsistence area. Chitina is a subsistence use area, it has positive findings for moose, bears, and other wild game. Portions of GMU 13 were reviewed by Joint Boards in 2007 and the Joint Board decided to keep it a Rural Determination. No new information was provided in 2007 to change the Rural Determination decision made by Joint Board of Fish and Game in 1992.

Submitted by Ahtna Tene Nene'

Gloria Stickwan
for
Linda Pete
Linda Pete

Native Village of Eyak
110 Nicholoff Way
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www.eyak-nsn.gov

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

ACR 1: Oppose

The Native Village of Eyak strongly opposes the Agenda Change Request (ACR) submitted by the Kenai River Sportfishing Association (KRSA). The ACR contradicts itself, and is supported by vaguely referenced data:

> "As evidence, we cite the very high rates of inter-regional straying of hatchery pink salmon into Lower Cook Inlet, and scientific research studies and agency reports that document the adverse impacts on wild salmon and other wildlife from increased food competition in the North Pacific Ocean, where there are record high salmon abundance levels and an increasingly variable ocean environment."

This language is often persuasive in garnering public outrage and support, but without any specific citations of empirical, peer reviewed studies the argument is not supported.

The actual data that is shared, a summary of hatchery strays in lower Cook Inlet streams, is also substantially misleading. Observations of Hatchery stray rates of "up to 70%" are detected in streams that are not listed in Alaska's Anadramous Waterways Catalog as Pink Salmon Streams, thus posing absolutely no threat to wild stocks. KRSA presents data that is, at most, superficially indicting, but opted not to share that the only listed pink salmon stream, Humpy Creek, had a stray rate below 3%, well within acceptable levels. Pink salmon are, by nature, inclined to explore, not displaying the same level of fidelity to their natal streams, rather happy to explore new areas. The observations in lower Cook Inlet are nothing more than this well-known behavior and no cause for the level of alarm being sounded by KRSA as absolutely no negative impacts have been verified.

Moreover, the vague references to "scientific research studies" contradict the data that the multi-year, multi-million dollar Alaska Hatchery Research Project has provided, showing natural genetic diversity across Prince William Sound indicating no evidence of hatchery fish interbreeding with wild fish. Moreover wild pink salmon stocks have seen record returns, even this past season when the fishery was overall very poor, locations such as Beartrap Bay in Port Gravina Tribal Elders observed an abundant return. This evidence suggests that Alaska's hatcheries are providing harvestable stock enhancement and preserving wild stocks.

KRSA has been conducting extensive social networking outreach with equally poor evidence,misleading supporters with conjecture. For example, some of their material correlates Chinook declines and hatchery production increases, asking its supporters if they believe this is a coincidence, thereby suggesting that hatchery production caused Chinook declines. There is no evidence to support this. Pink salmon live offshore and primarily consume plankton and invertebrates, whereas Chinook live nearshore and primarily consume fish. It is far more likely that young pink salmon provide a supplemental feeding opportunity as them move offshore, rather than compete with pink salmon for resources.

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www.eyak-nsn.gov

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

With so much of KRSA's own argument relying upon "scientific research studies" it is telling that KRSA seems entirely uninterested in the multi-year, multi-million dollar Alaska Hatchery Research Program, which the state has created to examine these exact issues so that hatcheries can continue to provide sustainable salmon enhancement using best management practices. The Native Village of Eyak is substantially involved in the rigorous and thorough processes that determines egg take goals as a member of Prince William Sound Aquaculture Corporation's Board of Directors, with a seat on its Production Planning Committee, and an ex officio seat on Prince William Sound's Regional Planning Team which reviews, modifies, and approves or denies each hatcheries egg take requests. The process is inclusive, and reliably produces strong returns sustainably for the benefit of Alaskans, our state's economy, the Prince William Sound region, and the world. This ACR would harm our state by undermining this process, which is a gold-standard for fisheries management. KRSA never sought to participate in this hatchery planning process and makes only vague references to "scientific research studies" without citing said studies.

Our growing world requires increasing amounts of high-quality protein, and hatchery enhancement is among the most responsible, sustainable ways of meeting that need, to the great benefit of our region and our state's wild salmon resources and sustainable economy. We do not wish to see this need met by fish farms, which many nations across the world are set to expand, nor do we wish to see high density feed lots increase to meet these needs. Such practices are harmful and degrade the common habitat needed for wild salmon stocks to thrive. Salmon enhancement using the existing processes to determine hatchery production delivers on the State's constitutional mandate to provide the maximum sustainable economic benefit from its resources.

The Native Village of Eyak urges the Board of Fish to reject this ACR and support the rigorous and responsible processes in place to determine hatchery production, and the ongoing scientific research being conducted via the AHRP in order to ensure that the state's enormous investment in hatchery infrastructure is used in the most responsible ways, to the benefit of our wild salmon resources.

ACR 2: Oppose

The Native Village of Eyak opposes Agenda Change Request (ACR) 2, submitted by Virgil Umphenour because it is incomplete, unnecessary, is not supported by any specific citation or reference, and piggybacks on ACR 1 submitted by the Kenai River Sportfish Association, but would render that ACR moot. ACR 2 should not be considered or discussed by the Board of Fish.

Mr. Umphenour did not complete the form, and so this ACR should be discarded on procedural grounds. This ACR simply does not address the following:

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE; and

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IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE; and

STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.

We cannot understand why ACR 2 was published, let alone considered, simply because no information was provided for the above, as required. We expect that this information is not being provided because the ACR *is* allocative.

Furthermore, the following question is inadequately responded to, and demonstrates the very poor justification for this ACR:

STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR. I was one of two BOF members that negotiated the hatchery protocol with ADF&G.

Mr. Umphenour was seated on the Board of Fish in a position of authority, and yet expressed no issue with the protocols for nearly two decades. We could find no record of the Board of Fish authorizing such a negotiation, or taking any action such as that claimed by the proposer, and acting upon an unauthorized negotiation is procedurally incorrect.

The ACR is itself undermines Mr. Umphenour's claim this was a settled negotiation between the Board of Fish and ADF&G "done at the BOF meeting in January-February of 2001," but does not state this in the question that addresses exactly this, rather this question is also left blank. Was this an informal meeting that did not carry weight with the final decision? There are too many questions regarding this proposal to allow it to be considered.

Finally, ACR 2 simply cites another ACR in detailing how it meets the required criteria:

STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED ABOVE.

1. **a) for a fishery conservation purpose or reason:** Yes. See KRSA ACR
2. **b) to correct an error in regulation:** No.
3. **c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:** No.

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Thus, it seems to avoid having to take the time to author a complete ACR, we must refer to "KRSA ACR" which is woefully inadequate, and once one is able to locate this "KRSA ACR" (not referenced by any standard means) the justification there is weak, however we do not feel it necessary to comment on the justification for meeting the criteria for an ACR when the proposer could not be bothered to include it in the ACR itself.

A proposal that would so greatly disrupt an important commercial fishery should be complete, well referenced, and stand on its own. If the author cannot conjure enough interest to complete a simple ACR form, the ACR they submit should be discarded without consideration, even if they are former members of the Board of Fish.

ACR 6: Support

The Native Village of Eyak supports ACR 6 submitted by Paul Shadura which would improve the ability of fisheries managers to meet escapement goals, and conserve sockeye runs on the Kenai River when returns are poor without removing the opportunity altogether.

We believe that, statewide, of Personal Use fisheries have somehow elevated in priority, having allocations to these fisheries become more established and guaranteed to participants regardless of run strength, and flaunting the very idea of a Personal Use fishery, which is established by 5 AAC 77.001 to provide Alaskans the means to harvest fish when there are surplus fish to harvest. The statute is clear, that Personal Use fisheries exist in areas where there are an "excess of both spawning escapement needs and present levels of subsistence, commercial and sport uses." However, we need not interpret the intention of this statute as it is explicitly stated:

> (b) It is the intent of the board that the taking of fish under 5 AAC 77 will be allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest.

Thus, we fully support Personal Use fisheries shouldering the entire conservations burden by seeing that the personal use fishery only opens when surpluses exist after subsistence, commercial and sport needs are met as per statute 5 AAC 77.001.

Moreover, we fully support the immediate reporting of all salmon harvested in Alaska. The Native Village of Eyak would like all salmon harvest to have universal reporting requirements, regardless of user group. Currently commercial salmon fisheries are required to report their harvest within 24 hours, and this standard should be applied to all user groups, with severe penalties for failing to report.

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ACR 8: Support

The Native Village of Eyak strongly supports ACR 8 submitted by Ahtna Tene Nene'. The proposal is simple and straightforward: salmon on the Copper River were never traditionally harvested from boats. Because they were not used traditionally and customarily, they should not be used in subsistence harvests.

We believe, further, that this should apply to all dipnet harvests on the Copper River, in both state (including personal use) and federal fisheries. Traditionally, dipnetting occurred from riverbanks, and that customary and traditional harvest should be sustained today and reflected in Alaska's subsistence harvest regulations.

In practical terms, we feel that boats afford anglers the opportunity to harvest a greater proportion of Chinook, and in seasons where sockeye are scarce and Chinook are abundant, such as 2018, boat-based dipnet fisheries, using gillnet webbing, cause unknown mortality from anglers having kept their limit of Chinook salmon and returning Chinook to the river while continuing to fish for sockeye. This mortality could have substantial impacts on actual spawning escapement that are not accounted for. Other alternatives exist for this issue, though, including requiring anglers to stop fishing once they have retained their limit of Chinook while simultaneously prohibiting the discard of any Chinook caught via dipnet. Another alternative would be to require the use on knotless 1" seine webbing.

JB ACR 1: Oppose

Joint Board Agenda Change Request (JBACR) 1, submitted by the Fairbanks Fish and Game Advisory Council is quite simply the first step in re-establishing Wood Canyon as a subsistence fishery. This is absolutely unnecessary and should not be considered, is not necessary per statute, and would reduce the flexibility fisheries managers have to conserve fish when necessary because Wood Canyon is so productive a fishery, and subsistence so difficult to limit compared to Personal Use.

Moreover, we believe it would be best to avoid the kind of user group conflict found on the Naknek River after receiving input from Tribal Members who participate Naknek River fisheries, amidst Personal Use, Subsistence and Commercial setnet and commercial drift gillnet fisheries. Naknek is a remote river, off the road system, and this is simply an apples-to-oranges comparison.

The Native Village of Eyak operates fisheries research programs on the Copper River between the flats and the Gulkana River, and everywhere in between. Quite simply, the area being discussed, Wood Canyon, where the Chitina Dipnet fishery takes place, is the most efficient, productive location to harvest salmon

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via dipnet. This was once a subsistence fishery area, but transitioned to Personal Use, and this transition is necessary for the resource. Harvest in Wood Canyon must be able to be curtailed when it is required for conservation, and a subsistence fishery in Wood Canyon would make that exceedingly difficult to limit when dictated by conservation per 5 AAC 99.010:

> If all available restrictions for nonsubsistence harvests have been implemented and further restrictions are needed, the board will eliminate nonsubsistence consumptive uses, and reduce the take for subsistence uses in a series of graduated steps under AS 16.05.258(b)(4)(B)

The rationale for this request is absolutely absurd, based upon the Board of Game not creating a nonsubsistence area. It is perfectly allowable for a Personal Use fishery to take place in an area that has not been designated as nonsubsistence; 5 AAC 99.016 simply allows for a Personal Use fishery in a nonsubsistence area, it in no ways requires that areas containing Personal Use fisheries be declared nonsubsistence by the Joint Board, and allows individual boards to make that determination:

> (a) A nonsubsistence area is an area or community where dependence upon subsistence is not a principal characteristic of the economy, culture, and way of life of the area of community. In a nonsubsistence area, the following activities will be permitted if so provided by the appropriate board by regulation:
>
> (1) general hunting, including drawing and registration permit hunts;
>
> (2) personal use, sport, guided sport, commercial fishing, and other fishing authorized by permit.
>
> (b) Subsistence hunting and subsistence fishing regulations will not be adopted by a board for a nonsubsistence area and the subsistence priority does not apply in a nonsubsistence area.

Moreover, the claim that "CPF area **may be** the only place in the state that lies outside a recognized non-subsistence [SIC] area and does not allow subsistence opportunity," (emphasis added) is tellingly vague and uncertain, if it is an unprecedented situation, the proposer should indicate it is, because this seems to be a major part of the argument even though this unique status would be perfectly allowable if it were actually unique. But it is not: 5 AAC 77 describes Personal Use areas in Arctic-Kotzebue Area, Norton Sound-Port Clarence Area, Yukon Area, Kuskokwim Area, Bristol Bay Area, Aleutian Islands Area, Alaska Peninsula Area, Chignik Area, Kodiak Area, Cook Inlet Area, Prince William Sound Area, Yakutat Area, and the Southeastern Alaska Area. Per 5 AAC 99.015, Joint Board nonsubsistence areas are limited to Ketchikan, Juneau, Anchorage-Matsu-Kenai, Fairbanks, and Valdez. These are the state's population centers, and are

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clearly the areas intended to be nonsubsistence. Characterizing Wood Canyon as similar should not be considered.

There is abundant subsistence hunting opportunity near Chitina, and that use can and should be maintained by the Board of Game, but that use should in no way be used to justify reverting Wood Canyon to a subsistence dipnet fishery. There is absolutely no basis for this request.

Submitted By
Alan Kapp
Submitted On
9/28/2018 1:18:13 PM
Affiliation

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alcapp@aol.com
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PO Box 3312
Valdez, Alaska 99686

I address my comments to ACR1 and ACR2.

I have been an Alaskan Commercial Salmon Fisherman for 47 years. I was a salmon purse seine fisherman in Prince William Sound prior to the advent of the hatcheries when we depended on wild stream returns only. I have also been a beneficiary of hatchery production since 1980 when the first PWSAC hatchery brought us substancial salmon returns.

Prior to hatcheries, salmon runs depended on mother nature's whims of weather and conditions. Did the returning salmon have enough water to lay their eggs in a salmon stream? If yes, then were the salmon eggs then washed away by heavy rain in October and November? Did the first snow come prior to the harsh winter temperatures to cover and protect the eggs in the salmon stream during the harsh cold? Did the timing of the fingerlings entering the inter-tidal areas coincide with the spring plankton bloom to help feed the fingerlings? All of these salmon survival issues were mitigated by the salmon hatcheries.

When the PWS hatcheries were established, the hatchery stream water sources chosen were the streams that didn't support salmon propagation due to waterfalls or other natural propagation obstructions. Hatchery construction made these non productive salmon streams into productive streams. This happened by intent, because the hatcheries were never meant to replace natural spawning, only to suppliment natural spawning.

I wish to address the straying salmon issue citied in ACR1. Straying salmon is a natural behavior and should be looked upon as a good thing. I personally have witnessed returning pink salmon in Vladivostok Russia as well as returning pink salmon in Puget Sound Washington. Returning pink salmon are quite a widespread phenonomen of which I believe to be by mother nature's intent. How else can pink salmon be spread from 45 degree latitude in the Eastern Pacific to 47 degrees latitude in the Western Pacific. I believe salmon straying to the different streams is why pink salmon are so wide spread and prolific throughout the North Pacific Ocean. Montague Island rose 33' in some locations because of the 1964 Alaskan earthquake, and yet today Montague Island has pink salmon returning to these areas after the salmon streams eroded to allow the pink salmon access to the spawning areas. Pink salmon stray and spread like the seeds of weeds blowing in the wind. Are they genetically different from one salmon stream to the next, I very much doubt the genetic differences are meaningful. I believe Kenai River Sportfishing Association doesn't like straying pink salmon just because they don't like the specific pink salmon specie.

Salmon hatcheries in Prince William Sound add to the salmon production of pink, sockeye, silver, and chum salmon. The hatcheries generate benefits to both commercial and sport usage of the salmon. They shouldn't be restricted in their salmon production, rather they should be encouraged and supported.

Submitted By
amber d lukin
Submitted On
10/3/2018 3:33:43 PM
Affiliation

To: Alaska Board of Fisheries

RE: Comments on Hatchery Related ACRs

Dear Chairman Jensen and Board of Fisheries Members,

I am a commercial fisherman from Prince William Sound. I oppose the acceptance of ACR 1 and ACR 2.

ADFG Staff comments regarding these ACRs found no purpose or reason for a conservation concern. The ACRs do not correct an error in regulation. The ACR does not address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted.

For these reasons, ACR1 and ACR2 do not meet the criteria for the Board of Fisheries to accept these Agenda Change Requests.

Additionally, Alaska's salmon hatchery program is integral to the economic sustenance of rural communities. Hatcheries support sport, personal use, susbsistence, charter, and commercial fisheries throughout the state, and provide tax revenues for local and state governments.

The hatchery programs are heavily science-based and decisions regarding hatchery production rely heavily on current data. There are no stocks of concern where most hatchery production occurs and historically, hatchery production has alleviated pressure on wild stocks.

Hatcheries should continue to be overseen by the Regional Planning Teams and ADFG biologists, who know and understand the history of salmon enhancement in Alaska.

Thank you for your consideration.

Signed,

Amber Lukin

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October 3, 2018

State of Alaska Board of Fisheries
October 15-16 Work Session
Comment re. ACR 1

To the members of the Board of Fisheries,

Proposal ACR 1 would set a dangerous precedent for the Board of Fish. The dramatic success of Alaska's fisheries management and the reason it is viewed with admiration all over the world is its scientific management. Other fisheries around the globe have been subject to political pressures that have invariably resulted in management decisions destructive to the wild stocks. One of the real geniuses of the Alaska constitution was its recognition how critical it is to protect our fisheries resources from these political pressures. Therefore the Board of Fish was established as an independent body, not under the direct control of either the legislature or the governor. The Board of Fish is comprised of volunteers from the public to ensure a diversity of points of view and a broad perspective on benefits to the state. The Board is also expected to rely heavily on the scientific expertise of the Alaska Department of Fish and Game, whose professionals are many of the best fisheries scientists in the world.

ACR 1 is asking the Board of Fish to override the research, judgment and recommendations of ADF&G regarding the proper permit level for the Valdez Fisheries Development Association's production. VFDA's request for a permit increase of 20 million pink salmon was duly vetted by ADF&G scientists and fisheries managers and subjected to the public hearing process four years ago. Its retroactive challenge by the Kenai River Sportsfishing Association is not based on sound scientific evidence, but rather on their allocative effort to decrease the commercial fisheries share of the resource and increase that of the sport fishing fleet.

The science of ocean carrying capacity and the interactions of various salmon species and other components of the marine ecosystems is extremely complex. It is far too easy for a person of limited scientific background to cherry pick studies or elements of studies that appear to support their own contentions. A thorough review of the available scientific literature by truly expert scientists simply does not support the arguments of KRSA and its supporters that there is any negative correlation between pink salmon production by Prince William Sound hatcheries and the marine survivals or the sizes of the other salmon species.

It is incumbent on the members of the Board of Fish to recognize their own limitations in their ability to serve as expert evaluators of the confusing array of scientific studies that have appeared over the years. Some of these studies have been carried out with much better designs than others, and some of the studies have apparently been tainted by authors who were attempting to validate their personal biases, which good scientific method goes to great lengths to avoid. I would like to request in the strongest possible terms that the Board of Fish rely on its natural source of scientific expertise, the Alaska Department of Fish and Game, to make sense of the scientific literature. Relying on the misguided contentions of KRSA or other parties who apparently possess a dangerous amount of limited knowledge or prejudices that

result in cherry-picking a limited portion of the studies will only lead to poor management decisions.

I fully support ongoing support for further scientific studies regarding the carrying capacity of the oceans and the interactions between the marine species, but there is clearly no emergency here. The Alaska PNP hatchery program is an amazing success story, and as non-profit organizations, the hatchery operators are as interested as anyone else in ensuring the health of the wild runs. The cost of enacting controls on the Alaskan hatcheries would be enormous, and any actions to do so should only be undertaken only in light of reliable scientific evidence.

Even though this particular ACR is addressing only one hatchery in Prince William Sound, I am above all alarmed at the prospect of the Board of Fish reacting to politically motivated and poorly informed initiatives to ask the Board to micro-manage Alaskan hatcheries, when there is such a thorough and successful system already established to play that role. Setting a precedent of revoking this approved permit increase would send the Board of Fish down a rabbit hole of reacting to political pressures and second-guessing the expertise of the scientists with the best interests of Alaska at heart, ADF&G.

With these comments, I am representing Armstrong-Keta, Inc. (AKI), an independent private non-profit corporation, built and operates the Port Armstrong Hatchery, which has been producing salmon on southern Baranof Island since 1983. We are a long way geographical from Valdez, but this issue is of upmost importance to every hatchery in Alaska.

Please adhere to the procedures that have served Alaskan fisheries for so many decades to date. Please reject ACR 1

Thank you for your consideration,

Bart Watson
General Manager
Armstrong-Keta, Inc.

Bart Watson
President

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October 3, 2018

State of Alaska Board of Fisheries
October 15-16 Work Session
Comment re. ACR 2

To the members of the Board of Fisheries,

Proposal ACR 2 is draconian and would be destructive. If this proposal is adopted, the Port Armstrong Hatchery will with certainty be forced to cease all production and declare bankruptcy. I can envision no plausible scenario in which this catastrophic outcome could be avoided.

Armstrong-Keta, Inc. (AKI), an independent private non-profit corporation, built and operates the Port Armstrong Hatchery, which has been producing salmon on southern Baranof Island since 1983. With an original permit of 11 million combined pink and chum salmon, it was initially a true “Mom and Pop” hatchery, intended to supplement the state and regional aquaculture hatcheries. The mission of the hatchery was to benefit the seine and troll fisheries of the southern Chatham Strait area, providing economic support to the depressed rural areas of Southeast Alaska. The chum broodstock was a late fall run, but it turned out the quality and marine survivals of that Security Bay stock were very poor upon returning to Port Armstrong, while in contrast the pinks thrived and were of exceptionally high quality. The Port Armstrong hatchery subsequently dropped its fall chum run in 1991, while expanding its pink run to become the mainstay of the hatchery. This hatchery has produced the only hatchery pink run of significant size in Southeast Alaska ever since.

The rapid expansion of salmon farming in Norway, Scotland, Chile and Canada began to flood world seafood markets in the 1990s. By 2002 and 2003, pink prices dropped dramatically, and AKI faced the prospect of no processor bids at all on its anticipated 2003 return due to farmed salmon competition. It was only a strike by the seiners that summer that suddenly altered the market dynamics and saved the season for AKI. But it had become obvious that the business plan of the hatchery, based on a modest number of pink salmon, was not going to generate sufficient income in the long term to cover the operating costs as well as provide significant common property contributions to the fishing fleets.

Therefore, AKI applied for and was granted a permit in 2002 for a summer chum run of 30 million eggs, with the goal of providing cost recovery income at Port Armstrong and eventually a terminal common property fishery at the adjacent Port Lucy. It proved extremely difficult to procure the eggs, due to shortfalls at the donor Hidden Falls Hatchery. It was only in 2009 that the Port Armstrong Hatchery finally was able to receive the full permitted quota of 30 million green eggs. Because the Department of Fish and Game is on principle conservative about establishing new runs, in order to be able to evaluate any impacts on the wild runs, the Department wanted to observe several years of returns at the 30 million level before considering AKI’s long-term goal of increasing production to 60 million eggs, at which the economies of scale make both the cost recovery and the common property contribution components of the run work sustainably into the foreseeable future. Finally, in 2015, ADF&G

concluded that they had observed enough years of chum returns at Port Armstrong to consider boosting the AKI permit to the full 60 million level, and AKI was granted the permit on the recommendation of the Regional Planning Team and the ADF&G scientists.

Because of the relative size and price of chums salmon in comparison to pink salmon, the chums are fundamental to the financial survival of AKI. Using our pro forma assumptions regarding marine survivals and prices per pound, each chum is worth approximately 6.25 times as much as each pink. The cost recovery income from the chums Port Armstrong Hatchery support the other production, particularly the 5 million coho eggs now permitted. The cohos have been a particularly strong contributor to the troll fleets in Southeast Alaska, with the common property contribution comprising 70% of the return in 2017. Additionally, the Port Lucy chum terminal fishery is intended to target the troll fleet. In light of the drastic cutbacks in troll opportunities due to several US/Canada treaty reductions in Chinook quotas, these common property contributions are particularly important to help the troll fleet increase its share of the Southeast salmon allocation goals.

This year, the Port Armstrong hatchery had sufficient broodstock available to take the full 60 million green eggs for the first time. This chum run is keystone to AKI's continued viability and its ability to continue producing cohos and pinks for the common property fisheries. With another new permit to produce up to 600,000 Chinooks at the nearby Little Port Walter Research station, this is an additional potential contribution to the troll and sports fishing fleets in Southeast Alaska. After many years of slow growth, AKI has finally achieved a production level that appears both sustainable and capable of making the desired contributions to the common property fisheries.

If, on the other hand, there is any retraction of the current permit levels, the survival of AKI will be thrown into doubt. A significant reduction of pink and/or chum levels would surely be the death knell for this facility and this non-profit corporation.

Please reject ACR 2.

Thank you for your consideration,

Bart Watson
General Manager
Armstrong-Keta, Inc.

Bart Watson
President

October 3, 2018

To: Alaska Board of Fisheries

RE: Opposition to ACR 1, ACR 2 on October 15-16 BOF Work Session Agenda

Dear Chairman Jensen and Board of Fisheries Members:

My wife Patty and I have lived in Seward year around for almost 40 years. Our three kids were born in Seward, and attended Seward schools through graduation. We love this place and it is by making a living commercial fishing that we have managed to stay and raise our families here. My first year as a seine deckhand in PWS was in 1985 on Arne Hatch's boat, the Phoenix. In the years since, we as a family have gillnetted from our own boat in PWS and on the Copper River for 14 years and also setnetted in Main Bay for 15 years. Both our sons, Gus and Bobby, have owned and operated PWS seine operations for the last ten years. Gus and I formed a partnership together in 2012 to build and operate the 58 ft seiner, the Frisian Lady. We built that boat from start to finish in Homer, Alaska utilizing a 100% local workforce while spending more than a million dollars with Homer vendors and marine contractors. Ann, our daughter, works as fleet manager for Camtu's Alaska Wild Seafoods, a hometown Cordova processor. Seward's local processing plant, Icicle Seafoods, employs many residents and absolutely depends upon pink salmon produced in PWS for its survival. Hundreds of coastal Alaskan families make a living from the PWS fisheries between tendering, gillnetting, seining, and processing. Also, guided charter fishing, a large fleet of private sport fishing boats, and heavily utilized shore based personal use fisheries are major economic drivers for our town as well as providing the most important locally sourced food available here. Hatchery releases support all of the above and have a decade's long history in Resurrection Bay. The raw fish tax is a very important component of Seward's annual city budget paying for infrastructure and services for which it would be very difficult to find other funding. Individually, and collectively, we are major local stakeholders that will be directly and negatively impacted by the ACR's referenced above.

Both of these ACR's so directly threaten our industry that I ask each Board of Fish member to demand a non-political process backed up by rigorous science. ADF&G initiated ongoing research into hatchery straying impacts on wild stocks in 2011 with extensive stream sampling, otolith analysis and genetic studies. Some results have been published and more are to come. ACR 1, submitted by KSRA, makes reference to straying of PWS pink salmon into Cook Inlet during the 2017 season. How does

this anecdotal sampling report fit into the larger research picture for prior years, or for the years to come? Was the sampling part of a broader research project? Performed by whom? Directed by whom? Any published results? I spent considerable time looking through the KSRA, ADF&G and CIAA websites and could find no answers to any these questions.

Further, KSRA makes the statement in their list of information supporting the need for ACR 1 that "*In 2017, 45 million salmon returned to the five hatcheries in PWS, accounting for 87 percent of the total salmon harvest.*" What? The 2017 PWS Salmon Season Summary, easily located on the ADF&G website, states the 2017 CCPF pink salmon catch was 43.5 million, with 20.27 million wild stock fish vs 23.23 million hatchery origin fish; a 47%/53% wild stock/hatchery split. I don't understand KSRA's statement and find its implications to be erroneous. The ADF&G's numbers are correct. Please ask KSRA to explain why they include misleading supporting statements such as these in their ACR. Meanwhile, Virgil Umphenour attaches the conservation purpose behind his authorship of ACR 2 to KSRA's statements in ACR 1. He thereby lays waste to a huge portion of Alaska's population and economy while doing the absolute least homework he could possibly do to back it up.

Concerns about hatchery impact on wild fish stocks are not new. KSRA has not participated that I know of in this discussion prior to arriving on the scene with guns blazing here in 2018. Would the dismantling of PWS's hatchery system as they propose bring even one more king salmon back to the Kenai River, ever? I see that premise as extremely premature. Granting approval at this time to either of these ACR's will cause harm to me, my family, my community, and many others statewide. Scientific studies currently underway would be short changed by jumping to conclusions at this time. Please do not approve either ACR 1 or ACR 2.

Sincerely,

Robert Linville
Seward, Alaska

Submitted By
Bradley G Tuttle
Submitted On
10/3/2018 3:18:04 PM
Affiliation
Alaska Resident

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North Pole, Alaska 99705

I am strongly opposed to limitlng the hatchery production of salmon in Alaska. The ripple effect of this limitation would resonate throughout all of the coastal communities that rely on this valuable resource, and would be felt even beyond that. As Alaska grows and changes, we need to change with it or be left behind. The new technology that hatcheries can offer to expand this resource should be encouraged. Our efforts need to be directed toward working together to supporting this resource, which is valued to Alaskans and beyond.

Submitted By
Carly Nelson
Submitted On
9/26/2018 7:58:34 AM
Affiliation

Member of the Board of Fisheries,

I OPPOSE ACR1 and ACR2 that intend to limit hatchery production. It is important to the state ecomony. I work on my dads boat in the summer and hatcheries are important to our fishery. Proponents have not submitted any proven scientific data to support thier request, its all theory. Thank You Carly Nelson

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Board of Fisheries
October 15-16, 2018
Work Session
Anchorage, Alaska

Re: Oppose ACR 1 & ACR 2 Reductions to Salmon Enhancement Programs

Dear Chairman Jensen and Board of Fisheries Members:

The Cook Inlet Aquaculture Association (CIAA) opposes ACR 1 submitted by the Kenai River Sportfish Association (KRSA) and ACR 2 submitted by Mr. Umphenour.

ACR 1 – this proposal was submitted in a similar form twice in the form of emergency petitions prior to the collection of eggs in 2018 and voted down each time. It is premature to re-consider this action. The Board of Fisheries (BOF) has asked for information about the hatchery program at the Work Session and at future BOF meetings. There will be numerous documents and several hours of Alaska Department of Fish and Game (ADF&G) presentations, as well as a forum to discuss and exchange information that the BOF has not had an opportunity to assess.

The ACR proposal claims there is a fishery conservation concern due to an unacceptable level of straying outside of Prince William Sound (PWS) streams. All salmon species stray. It is a natural mechanism which allows salmon to colonize new or previously inaccessible areas. The Alaska salmon hatchery program is guided by hatchery practices designed to maintain the characteristics of natural salmon populations. There is no evidence presented to demonstrate hatchery pink salmon stray rates vary from naturally produced pink salmon and are unacceptable.

If ACR 1 is accepted, the BOF will be asking the Solomon Gulch Hatchery to kill live animals. These animals (i.e., eggs) were collected on good faith after the two similar emergency petitions were voted down. No new information is presented to justify this action.

ACR 2 – CIAA concurs with the reasoning set forth in the ADF&G Staff Comments (RC2). This ACR does not meet the criteria to be adopted. It appears little effort or thought was put into the proposal or in understanding Alaska's salmon enhancement program. The proposal should be rejected and the BOF should be commended for scheduling a hatchery committee meeting at the October work session to become better informed about the salmon enhancement program.

CIAA is dedicated to protecting and providing salmon for all user groups. We recognize the value of both hatchery and naturally produced salmon fisheries. We have reviewed ACR 1 and ACR 2, concur with the comments provided by the Northern Southeast Aquaculture Association and the Valdez Fisheries Development Association regarding these ACRs and request the BOF reject both ACRs.

Respectfully,

Gary Fandrei

Gary Fandrei,
Executive Director

Copper River/Prince William Sound Marketing Association

COPPER RIVER

PRINCE WILLIAM SOUND
WILD ALASKA SOCKEYE

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October 3, 2018

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

I am writing on behalf of the Copper River/Prince William Sound Marketing Association (CR/PWSMA). The Marketing Association is the Regional Seafood Development Association, that collects the 1% Salmon Marketing Tax, and whose mission it is, to increase the value of Area E salmon for it's members and the region.

There are 6 private non-profit hatcheries in our region producing salmon for the commercial, recreational and subsistence fisheries. Depending on the year, upwards of 80% of the salmon harvested in Prince William Sound, are enhanced salmon from the Prince William Sound Aquaculture Association and the Valdez Fisheries Development Association.

CR/PWSMA does not believe that ACR 1 & 2 meet the criteria to consider an Agenda Change Request; there is not a conservation concern, there is not an error in regulation and there has not been an unforeseen effect of a regulation.

We question why the Board of Fisheries would consider reducing hatchery production to 75% of the year 2000 levels. We question why the Board of Fisheries would consider not allowing salmon eggs that have been harvested, to be incubated and released.

- ☐ Is it because the board thinks wild stocks are being harmed? *Statewide, salmon harvests in Alaska in 2013, 2015 and 2017 were three of the four largest wild stock returns in history, going back to the late 1800s.*

- ☐ Is it because the board wants to reduce the economic value of commercial fisheries? *In 2017, the statewide commercial fleet caught 47 million hatchery-produced salmon, a harvest worth an estimated $331 million in first wholesale value and $162 million in ex-vessel value. Reducing hatchery production would result in the loss of processing, harvesting, transportation and marketing jobs, and a reduction in fisheries business taxes and tourism opportunities. It is difficult to imagine the far-reaching consequences of a 25% reduction in salmon resources.*

☐ Is it because you want to reduce recreational and subsistence harvest opportunities? *Hatchery production salmon are a vital source of sport, personal use, and subsistence salmon.*

Please vote no on ACR 1 and ACR 2.

Thank you,

Thea Thomas, Secretary
CR/PWSMA Board of Directors

Submitted By
Cathy Renfeldt
Submitted On
10/3/2018 4:58:13 PM
Affiliation
Cordova Chamber of Commerce Executive Director

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9074247260
Email
executivedirector@cordovachamber.com
Address
PO Box 99
Cordova, Alaska 99574

September 3, 2018

To: Alaska Board of Fisheries

RE: Comments on Hatchery Related ACRs

Dear Chairman Jensen and Alaska Board of Fisheries Members:

The Cordova Chamber of Commerce has recently been made aware of two Agenda Change Requests for your upcoming meeting. As the voice of the Cordova business community with members comprising a variety of industries including lodging, transportation, outfitting, retail, shipping, seafood harvesting, processing and many others areas; **we do not support the acceptance of ACR1 or ACR2 because they do not meet the criteria for the BOF to accept and because we feel that Alaska's salmon hatchery program is integral to the economic sustenance of rural communities like Cordova.**

Alaska's salmon hatchery program has proven to be significant and vital to the state's seafood and sportfish industries and the State of Alaska by creating employment and economic opportunity throughout the state and in particular in rural coastal communities like Cordova. We know that the City of Cordova and all local businesses benefit greatly from Prince William Sound salmon fisheries enhancement programs through hatchery propagation; both sport and commercial fisheries enhancement efforts of the Valdez Fisheries Development Association and Prince William Sound Aquaculture.

We also feel these programs provide sustainable direct economic and social benefit to the community of Cordova. This benefit is realized through the creation of local seafood processing jobs, fisheries business tax, increased commerce and seafood industry investment in our community. In addition, the enhancement of the sport fishery by hatcheries provides significant fishing opportunity for coho salmon throughout eastern Prince William Sound, and this sport fishing activity significantly increases summer tourism by attracting visitors to Cordova to sport fish in eastern Prince William Sound. This further benefits local commerce through the sale of sporting goods, custom processing, lodging, fuel, harbor moorage, float plane charters, fishing charters and other purchases. We feel strongly that hatcheries should continue to be overseen by the Regional Planning Teams and ADFG biologists. This team knows and understands the history of salmon enhancement in Alaska and employ strong scientific methodology built upon precautionary principles and sustainable fisheries policies intended to protect wild salmon populations.

Sincerely,

Cathy Renfeldt

Executive Director, Cordova Chamber of Commerce

Cordova District Fishermen United
PO Box 939 | 509 First Street
Cordova, AK 99574 | www.cdfu.org

September 24, 2018

John Jensen, Chairman
Glenn Haight, Executive Director
Alaska Board of Fisheries
Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115526
Juneau, AK 99811

RE: Comments on October 15-16 Work Session Agenda Change Requests

Dear Chairman Jensen and members of the Board of Fisheries,

Cordova District Fishermen United opposes ACR 1 and ACR 2. Hatchery production is set through a thoroughly vetted process involving the Alaska Department of Fish and Game and the Regional Planning Team. The Board of Fisheries does not historically have any involvement in the decision-making process regarding hatchery production.

CDFU believes our statewide hatcheries are well managed, and rely on Alaska Department Fish and Game research for management decisions for the future of all stocks. It is imperative that hatchery production be science-based and driven by the Alaska Department of Fish and Game's continued research. Circumventing the permitting process for hatchery production by utilizing a political process, rather than a scientific one, is a breakdown of public trust and jeopardizes the future of Prince William Sound fisheries.

The Regional Planning Team's extensive knowledge of hatchery operations uses sound science to guide permit approval. All decisions regarding hatchery production cannot be finalized without review by the Commissioner of Fish and Game.

Hatcheries contribute to economic stability in the Prince William Sound region and Prince William Sound hatchery stocks are utilized by sportfish, subsistence, and commercial users. The hatchery program in Prince William Sound was created with the intent to protect fisheries during weaker wild salmon runs. Without hatchery operations this year, with the Copper River District

closed for much of the season, the gillnet and seine fleets in Area E would have had very little opportunity to fish, and the impacts to our community would have been profound and devastating.

Due to the nature of the Board of Fisheries seats, which are political appointments, hatchery production limits should continue to be set collaboratively by the Alaska Department of Fish and Game and the Regional Planning Team, after thorough review of the scientific data. ACR1 and ACR2 are submitted by authors who have no involvement in any fishery in Prince William Sound (as stated in each ACR by their respective authors), and therefore we believe the requests are political in nature and not an issue of conservation.

We recommend that the Board of Fisheries receive an annual report from the statewide hatcheries and Alaska Department of Fish and Game staff, but that decision making regarding hatchery production remain the duty of the Regional Planning Team and the Commissioner of the Alaska Department of Fish and Game.

Thank you for your consideration.

Gerald McCune

Gerald McCune
President
Cordova District Fishermen United

Submitted By
Dan Moody
Submitted On
10/3/2018 2:11:46 PM
Affiliation

Phone
9074576335
Email
Dan.akgundogs@gmail.com
Address
575 Deepfreeze ct
Fairbanks, Alaska 99710

I oppose cutting fish hatchery production.

Submitted By
Darrel Olsen
Submitted On
10/3/2018 2:32:19 PM
Affiliation

Phone
9072535757
Email
Darrelak82@gmail.com
Address
PO Box 66t
Cordova, Alaska 99574

Our community and neighbors Valdez,Tatitlek,and Chenega relay and are effected by the hateries and the production. Please do not cut our hatachery production.

Submitted By
Dave Beam
Submitted On
10/3/2018 9:42:16 PM
Affiliation

Phone
907 244 4701
Email
girdwood52ak@yahoo.com
Address
PO Box 297
Girdwood, Alaska 99587

Dear Chairman Jensen and Board of Fish Members,

I am writing to you in opposition to the ACR #1 submitted by KRSA and the ACR #2 submitted by Virgil Umphenour.

My name is Dave Beam. I have lived in Alaska and worked as a commercial fisherman since 1979. Most of my years fishing have been in Prince William Sound. I owned and operated a gillnet boat for twenty two years and for the last ten years have owned and operated a seine boat. I currently live in Girdwood and have resided here since 1990, where I have raised and supported my family with income from commercial fishing.

When the seine season is over, my boat the R/V Montague is used as a research platform for scientific studies. Since 2009, I have worked in PWS with NOAA, USGS, US Forest Service, ADF&G, and the Prince William Sound Science Center. I am well aware of the Hatchery/Wild study in PWS, ongoing for the last 6 years. The data generated from this six year study does not support the idea that hatchery production in PWS is harming wild stock pinks and chum salmon in any way. In fact, it almost looks like the opposite is happening. In the last ten years, we have had four years of record pink and chum wild stock returns. Passing ACR #1 and ACR #2 is not supported by sound science and would be devastating to the commercial fleet across the state that relies on hatchery production. It has been calculated if hatchery production is reduced to the levels proposed, PWS fishermen would lose $50 million annually. This is totally unacceptable.

In even years, as in the 2018 season, we face making a modest profit, breaking even, or ending the season losing money as we did in 2016. Cutting hatchery production to 75% of permitted levels from the year 2000 could mean future even years would not be profitable enough to put our nets in the water. The list of people, businesses, fishing towns, etc. that would be financially impacted by these two ACRs is very long. All the commercial salmon fishermen that rely on hatchery production in Alaska would be affected. In PWS alone, that would include 550 gillnet boats and 250 seine boats- approximately 2000 people. We are talking about the financial impact to crew members, processors and the people they employ, and the towns where they live and spend money. Also affected would by the price of boats and permits.

I strongly urge the Board of Fish to not support ACR #1 and ACR #2.

Dave Beam

David Hilty

1834 Mission rd
Kodiak AK, 99615
dhilty@gci.net

September 28, 2018

Alaska Board of Fisheries

Chairman Jensen and members of the board of fish

My name is David Hilty, I am a commercial fisherman, Kodiak Aquaculture Association board member, a fish spotter and sport and subsistence user. I am writing you today in support of Alaskas' hatchery programs and would like to encourage you to reject ACRs 1 and 2 and take no action that would reduce or limit hatchery production.

I have lived in Kodiak for over 40 years and have been dependent on commercial salmon fishing for my entire career and subsistence for as long as I can remember.

The hatcheries around Kodiak have played a very important roll in providing a consistent source of salmon for commercial, subsistence and sport fishers especially during down cycles and other natural events such as drought and extreme cold winter conditions.

KRAA has provided subsistence opportunities near the villages of Ouzinkie and Port Lions for the harvest of red salmon by releasing smolt near the villages. These returns provide for the villagers and take fishing pressure off of other small returns that can be over harvested during years of weak returns.

Kitoi hatchery near the town of Kodiak has been very beneficial to the "small boat" portion of our seiner fleet. Many of these boats are unable to venture far abroad in bad weather conditions common to Kodiak. They will spend a large portion of their season at the hatchery, which in turn takes additional pressure off of more vulnerable small wild stock river systems. This past year, based on the preseason forecast, the hatchery managers and board members chose to forgo having a cost recovery fishery in order to give as much of the resource and fishing opportunity as possible to the fishermen. This resulted in more than half of the fleet staying at or near the hatchery which provided 53% of the pink salmon caught in Kodiak. This in turn allowed for less fishing pressure and better escapements on wild stock rivers during a rebuilding year.

Any restriction to hatchery production will create less fishing opportunity, a loss of fishing and processing jobs and will definitely have a negative impact on our community.

Sincerely yours,

David Hilty

Submitted By
David Fleming
Submitted On
10/3/2018 11:28:32 PM
Affiliation
Alaskan

Phone
9072024503
Email
davidfleming13@hotmail.com
Address
4115 wright St #3
Anchorage, Alaska 99508

My name is David Fleming and I am an Alaska resident (born and raised) who actively participates in the sport, subsistence/personal use, and commercial fisheries. I have had countless family (father, mother, brothers, sister, cousins, uncles, etc.), friends and other fellow Alaskans who I have fished alongside with at various times throughout my life.

I am proud to say I have close friends who are sport-tour guide operators, avid sports fishers, commercial and subsistence/personal use families.

I am writing in regards to ACR 1 & 2 and about the effects it could potentially have on not just myself, but all Alaskans. From an economic standpoint-devastating, from an environmental standpoint-obscure, from a social/fishing standpoint-damaging (to livelihoods, culture, and setting an extremely obfuscating precedent.)

-Economic standpoint-

We all know the importance of wild and hatchery salmon to our Alaskan communities. I do not have all of the figures in front of me, but it surely is the backbone of many small Alaska communities and if passed, would have impactful consequences from the bottom up.

-Environmental Standpoint-

Passing ACR 1 & 2 on the basis of science that has been studied “one way” and jump to a conclusion on that theory is extremely worrying. It seems way to theoretical at this moment to agree that one study is correct while there are plenty of others stating the opposite.

And isn’t this ADFG’s job anyway? Call me no expert, but I thought there is a process for ADFG to use the latest science and meet with regional planning teams from PNP’s to set these levels. It makes more sense to let the scientists handle the science.

-Social/Fishing Standpoint-

To corner hatchery salmon sets a bad precedent for all fish. Are we really going to change regulation every time one species of fish stocks go up or down for a few years and then reverse course after that.

By allowing ACR 1 & 2 to go forth would demonstrate the invalidity of our system, and also have damaging effects on our industries and ways of Alaskan life no matter the user group.

Submitted By
Deborah Eckley
Submitted On
10/3/2018 12:23:42 PM
Affiliation
fisherman

Date: 10/3/2018
Fisherman: Deborah Eckley
Vessel: F/V Ariel and F/V Dreadnought
Homeport: Cordova, Alaska

To: Alaska Board of Fisheries

RE: Comments on Hatchery Related ACRs

Dear Chairman Jensen and Board of Fisheries Members,

I am a commercial fisherman from Prince William Sound. I oppose the acceptance of ACR 1 and ACR 2.

ADFG Staff comments regarding these ACRs found no purpose or reason for a conservation concern. The ACRs do not correct an error in regulation. The ACR does not address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted.

For these reasons, ACR1 and ACR2 do not meet the criteria for the Board of Fisheries to accept these Agenda Change Requests.

Additionally, Alaska's salmon hatchery program is integral to the economic sustenance of rural communities. Hatcheries support sport, personal use, susbsistence, charter, and commercial fisheries throughout the state, and provide tax revenues for local and state governments.

The hatchery programs are heavily science-based and decisions regarding hatchery production rely heavily on current data. There are no stocks of concern where most hatchery production occurs and historically, hatchery production has alleviated pressure on wild stocks.

Hatcheries should continue to be overseen by the Regional Planning Teams and ADFG biologists, who know and understand the history of salmon enhancement in Alaska.

Thank you for your consideration.

Signed, Deborah Eckley and Family

Submitted By
Deborah A Lyons
Submitted On
10/2/2018 6:19:32 PM
Affiliation
NSRAA Secretary Treasurer

Phone
9077383362
Email
dlyons@gci.net
Address
PO Box 379
Sitka, Alaska 99835

Re: Oppose ACR 1 & ACR 2 Reductions to Salmon Enhancement Programs

The NSRAA General Manager Steve Reifenstuhl submitted a very thoughtful, reasoned and well documteded letter concerning ACR 1 & ACR 2 on October 3, 2018. I agree with his conclusions, that the two proposals should not be supported and implemented. Our 25-member Board of Directors is composed of 15 commercial salmon permit holders and 10 members of the public. They firmly believe in and uphold the NSRAA mission statement;

" The Northern Southeast Regional Aquaculture Association (NSRAA) is a private non profit corporation created to assist in the restoration and rehabilitation of Alaska's salmon stocks, and to suplement the fisheries of Alaska by utilizing articial propagation to enhance the availability of salmon to all common property users, without adverselt affecting wild stocks. NSRAA is comitted to promoting the wise use of Alaska's salmon resources through education, sustainable harvest management, the maintenance, protection and promotion of high quality fish habitat, and the utilization of the highest scientifict standards, in carrying out its mission."

Yours Truly,

Deborah Lyons

Submitted By
Dennis M. Zadra
Submitted On
10/3/2018 4:26:20 PM
Affiliation
Commercial Fisherman

Dear Chairman Jensen and Members of the Board of Fish,

I would like to express my oposition to ACR 1 and ACR 2. On ACR 1, The board and ADF&G staff have already determined that this issue does not meet the criteria to be heard both last spring and again in mid summer. ACR 2 is an extreme attempt to change the hatchery program and would cost a great deal to many coastal communities. The hatchery program has been going on for over 40 years during which we have seen record returns of both wild stocks and hatchery fish. There is no evidence to support the claims of the proponents. Again, neither of these ACR's meet the criteria.

Thank you for the opportunity to express my point of view.

Submitted By
jeff
Submitted On
10/2/2018 9:28:29 AM
Affiliation
Pacific Star Seafoods/E&E FOODS

Phone
9072527485
Email
jeffb@eefoods.com
Address
box 39229
ninilchik, Alaska 99639

9/30/2018

Dear Board of Fish Directors,

We are a Primary buyer, Processor and distributor of Alaskan Seafoods with Plants in Yakutat, Kenai and Bristol Bay. E&E Foods is the Parent Company of Yakutat Seafoods, Pacific Star Seafoods And Coffee Point Seafoods. While we are not the largest processor we contribute significantly to the local economy especially in Southcentral Alaska where we operate Pacific Star Seafoods which is a very high capacity production facility that primarily produces frozen salmon.

We buy Salmon and other specie in Whittier, Seward, Homer, Kasilof, Kenai and have buying stations all along the peninsula, as well as a fleet of Tender vessels that buy in Lower Cook Inlet. Our production facility in Kenai was first in operations since the late 1800's and is a way of life in our area that has existed for many generations and we hope, for many to come. We operate buying stations in Kotzebue which contributed over 1 million pounds to our Kenai production during poor returns in this area.

We are members of almost all fishermen's organizations including UCIDA, ASA, UFA, CIFF, and others.

E&E Foods are engaged with Hatchery production in cost recovery operations and common property fisheries in Southcentral Alaska and will be severely impacted by a 25% reduction in Hatchery production. These proposals and Agenda Change Requests have been put forward with out any scientific basis and are just based on a few individual's personal beliefs. There is a study under way that will address these concerns with sound and verifiable science. These results will be out in the next 24 months or so. We ask that you do not take these ACR's up at this time and wait for the science.

These actions are not warranted at this time and do not meet the criteria required for an Agenda Change and will adversely effect our entire state and our local communities, not only in lost revenue from the fish but wages from processing, spin off revenue from processing and distribution and taxes, as well as, all the downstream impacts.

Should the Board of Fish take this up at this time it could jeopardize our sustainability and the future of our industry. This is not the time or the place to do this. Please wait for the science to guide us in this most important process. As with all our decisions regarding management of our most precious resources it should be about the resource and sound scientific management not Politics.

Aquaculture has been pursued on the West coast and in Alaska for a long long time and this issue has only been brought up in the last year or so by a very few vocal and high profile individuals. We should not let the Media manage our Salmon with publicity. Our Aquaculture programs have been permitted and vetted rigorously for many years and have given us tremendous benefits saving the lively hoods of thousands of people. We should not act hastily on this. We need careful study, analysis and science to guide our decision making process.

Thank you all for your consideration.

Jeff F. Berger

Regional Director of Fishers and Products

Submitted By
Eric W. Jordan
Submitted On
10/2/2018 5:31:30 PM
Affiliation

Phone
907-738-2486
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ericsarahjordan@gmail.com
Address
103 Gibson Place
Sitka, Alaska 99835

BOF members, staff, and interested public, My name is Eric Jordan. I am commenting on ACR 12. Cap statewide p[rivate non-profit salmon hachery egg take capacity at 75%of the level permitted in 2000. I am opposed to ACR 1 and ACR 2.

I am a lifelong Alaskan fisherman since my parents took me fishing when I was 5 months old on their 32 foot salmon troller "Salty" in 1950. I have been involved in Hatchery programs since I completed a hatchery technician program in 1977 at Sheldon Jackson College. I am one of the founders of the Northern Southeast Regional Aquaculture Association and its second employee in 1977. I am currently on their board of directors representing power trollers. I have read the ACR's and the response by Steve Reifenstuhl. I concur completely with his comment which reflects some of my reading and understanding over the years. My comment is that the SE Alaska salmon hatchery programs are absolutely essential to my fishing business. Our spring troll fishery for high value kings in May and June is 100% dependent on hatchery kings giving us fishing opportunity. During the summer season my primary source of income, over 90% this year, is troll caught hatchery chum. From my perspective the PNP hatchery legislation and development in Alaska is one of the great salmon success stories of all time. I pioneered the chum troll fishery by trying to catch chums as early as 1979 in Excursion Inlet. My first little bit of success came in the mid 80's in Excursion Inlet. In 1988 we had our first success and started to successfully target hatchery chums in Sitka Sound in 1990. Since then targeting hatchery chums has become an important component of the troll fishery from Ketchikan to Icy Straits. This year trollers caught over 200,000 chums from our recently permitted release site in Crawfish Inlet. I fished chums from July 1 until September 18 except for 1.5 days during the August King salmon troll opening. Chum trolling is almost always in relatively protected waters near the release sites chosen to minimize impacts to wild salmon stocks. This makes it attractive to the smaller boats and many family fishing operations in our fleet. Chum trolling gear and techniques have evolved to be highly selective for chums. Similar to my, and my crew testimony at previous BOF meetings, my by-catch of king salmon and sockeye salmon over this year has been practically none. We do catch some pink salmon and coho when they are abundant where we are fishing chums. But in most areas they are not present when we are fishing chums. In the new Crawfish area south of Sitka there was almost zero by-catch of other salmon during the troll fishery for chums. In our region many of the guides and I communicate regularly and they are happy to see trollers targeting hatchery chums instead of competing with them for kings and coho. In conclusion, I believe this ACR does not meet the criteria for an AC, and when brought up during the regular cycle for this kind of proposal will surely fail on its lack of merit, scientific scrutiny, and devastating impacts to salmon harvest values around the Gulf of Alaska. Thank you! Eric Jordan

Submitted By
Eric Lian
Submitted On
10/3/2018 3:06:51 PM
Affiliation

Dear Board members, My name is Eric Lian, a PWS SO3E salmon drift gillnetter and resident from Cordova. My family has made its livelihood from healthy sustainable PWS fisheries since 1896, and myself have been skippering my own commercial fishing vessel since 2005. My parents helped PWSAC hatcheries get its start through chartering their own fishing vessel for hatchery research back in 1976. The opportunity gave them the chance to work closely with ADF&G biologists that saw the value and importance of a hatchery program. The hatchery program needs to be ran with unbiased science and not political motives; I ask that the BOF special meeting not reduce hatchery production in Prince William Sound. Thank you for your time and consideration! Warm regards, Eric Lian d.b.a. Best Salmon LLC F/V Fine Line

Submitted By
Ezekiel Brown
Submitted On
9/26/2018 11:07:37 AM
Affiliation

Dear Chairman Jensen and members of the Board of Fisheries,

My name is Ezekiel Brown and I oppose ACR 1 and ACR 2. I strongly oppose the board of fish becoming invloved in hatchery permiting and production.

I am a 28 year old first genneration commercial fisherman from Cordova, Alaska and currently own and operate a seine boat/permit and gillnet boat/permit for Prince william sound and the Copper river. I have been working in Prince william sound catching hatchery and wild salmon for 16 years and plan to continue for the rest of my life. I have been able to purchase my own boats because of the stability created by the pink, chum, sockeye and coho hatchery programs in Prince william sound.

Just in the relativly short time I have been involved in these fisheries I have seen multiple record breaking returns of salmon both wild and hatchery. The salmon returns do not lie. Prince william sound is a healthy and productive fishery and changing the process that has created this would be a foolish thing to do with such a strong track record.

The hatcheries statewide are well managed using the best avaliable science through the ADFG and the Regonial planning commisions. There is no reason to take action on our current hatchery system in Prince william sound as none of the wild stocks in the area have been deemed stocks of concern. The Board of fish is a very valuable tool in managing Alaska's fisheries but it is far to political in nature. Alaska's fisheries need to continue with strong science based managment and not fall into political infighting between user groups that public processes like the Board of fish can create.

Thank you for your time,

Ezekiel Brown

Submitted By
Galen Meyer
Submitted On
10/3/2018 4:07:58 PM
Affiliation

Dear Chairman Jensen and Board of Fisheries Members,

I am a Prince William Sound purse seine fisherman and co-chair of the Cordova District Fishermen United Seine Division. I oppose the acceptance of ACR 1 and ACR 2.

ADFG Staff comments regarding these ACRs found no purpose or reason for a conservation concern. The ACRs do not correct an error in regulation. The ACR does not address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted.

For these reasons, ACR 1 and ACR 2 do not meet the criteria for the Board of Fisheries to accept these Agenda Change Requests.

Additionally, Alaska's salmon hatchery program is integral to the economic sustenance of rural communities. Hatcheries support sport, personal use, subsistence, charter, and commercial fisheries throughout the state, and provide tax revenues for local and state governments.

The hatchery programs are science-based and decisions regarding hatchery production rely heavily on current data. There are no stocks of concern where Prince William Sound hatchery production occurs and historically, hatchery production has alleviated pressure on wild stocks.

Hatcheries should continue to be overseen by the Regional Planning Teams and ADFG biologists, who know and understand the history of salmon enhancement in Alaska.

Thank you for your consideration.

Signed,

Galen Meyer

Mr. Jensen and Members of the Board,

I'm a lifelong commercial fisherman from Cordova. I have fished salmon and herring throughout the state and currently seine Sitka herring and Prince William Sound (PWS) salmon. Hatcheries are vitally important to the community of Cordova, as well as the state of Alaska. Continued science based management is what we count on for ensuring long-term sustainable fisheries that support thousands of Alaskan families every year. Making reactive decisions without the proper scientific data and using only one anomalous event (e.g., PWS hatchery pinks spawning in lower Cook Inlet) is likely to lead to bad management practices, given that fisheries naturally change from year to year due to many different factors.

At a time when foreign hatcheries are increasing releases, limiting hatchery fry releases in Alaska (which would only constitute a small portion of the total salmon fry released into the North Pacific) without international cooperation would only serve to limit Alaska's stake in North Pacific salmon. Some years PWS hatchery salmon are a large portion of the total catch for the fishermen of Cordova. Reducing the hatchery output would place a noticeable hardship on Cordova families as well as fishing families throughout the state.

The Sitka Sound herring fishery was addressed at last spring's Board of Fish meetings in Sitka. There is no need to address herring again until it is up for its usual review cycle. To change management practices because of market conditions and where the herring decided to spawn for this one year, with no solid scientific rationale, is again being reactive and goes against Alaska's long-standing successful practices in fisheries management.

For these reasons, I'm opposed to ACR1, ACR2, and ACR10.

Sincerely,

Hughie R. Blake
Commercial Fisherman

October 3, 2018

Chairman John Jensen
Alaska Board of Fisheries
dfg.bof.comments@alaska.gov
Agenda Change Requests (ACRs)
October Worksession

RE: OPPOSE ACR's 1, 2, 10 SALMON HATCHERY PRODUCTION AND SITKA HERRING HARVEST

Chairman Jensen and members of the Alaska Board of Fisheries,

Icicle Seafoods is one of the largest and most diversified seafood companies in North America, with facilities throughout Alaska. We process a variety of species and our operations are located throughout the State including Southeast, Prince William Sound, Cook Inlet, Kodiak, Dutch Harbor, and Bristol Bay. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of fisheries resources. We appreciate the opportunity to comment on the Agenda Change Requests (ACRs) submitted to the Alaska Board of Fisheries (BOF) for the October Worksession.

We based our comments on the criteria for ACR's. ***In order for the board to approve and schedule an ACR for later in the meeting cycle, the ACR must meet one of the following criteria as established in 5 AAC 39.999.***

- For a fishery conservation purpose or reason.
- To correct an error in a regulation.
- To correct an effect on a fishery that was unforeseen when a regulation was adopted.

We are opposed to the following ACR's due to lack of meeting ACR criteria:
ACR 1, OPPOSE. Prohibit VFDA from incubating, rearing, and releasing pink salmon resulting from additional egg take capacity permitted in 2018 and cap egg take capacity.
ACR 2, OPPOSE. Cap statewide private non-profit salmon hatchery egg take capacity.
ACR 10, OPPOSE. Close Sitka Sound commercial sac roe herring fishery until regional herring stock status improves, additional research on herring is conducted, and the amount necessary for subsistence is met in at least three consecutive years.

ACR 1 and 2, OPPOSE. As a processing company that is dependent on salmon, we oppose the petitions submitted by the Kenai River Sportfishing Association (KRSA) and Virgil Umphenour. Hatchery organizations and ADF&G have already provided you with significant scientific information and a comprehensive explanation of the hatchery egg take permitting process, so our comments will focus on ACR criteria. In addition, Icicle Seafoods submitted comments at the emergency meeting held in July. Both ACR 1 and 2 are attempts to circumvent the BOF process, regular meeting cycle, and the appropriate hatchery egg take permitting process that is driven by science and rigorous analysis.

There has been plenty of opportunity to comment and participate in the permitting process. This issue does not constitute an emergency or conservation concern. This is the third attempt since May by KRSA to use the BOF process to curtail permitted hatchery production. Publications repeatedly cited by KRSA are irrelevant to the current discussion and seek to "cherry pick" scientific information. Some of the publications have very little to no credibility within the greater scientific community.

We encourage the BOF to continue to support the ongoing Alaska Hatchery Research Project (AHRP) which was designed to analyze potential interactions between hatchery and wild salmon in Alaska. This research project will provide crucial data and help provide clarity on the multitude of unverified scientific "facts" that are being distributed to confuse the general public.

In addition to these ACRs not meeting the criteria, by attempting to restrict commercial ability to harvest salmon through hatchery production, the proposers are actually limiting the personal use, sport, and subsistence harvest. All user groups are dependent on hatchery production as an important salmon resource.

There is no fishery conservation purpose or reason for these ACR's. These ACR's do not correct an error in a regulation. These ACR's do not correct an effect on a fishery that was unforeseen when a regulation was adopted.

ACR 10, OPPOSE. Once again, the ARC process is being used to try and circumvent the regular BOF cycle in regard to herring. The BOF January 2018 Southeast and Yakutat Finfish and Shellfish meetings in Sitka already extensively dealt with herring issues. Regardless of a regularly scheduled BOF cycle, herring harvest opponents consistently attempt to use the ACR process to manage the herring fishery.

As is the same for every ACR herring proposal (both now and in the past), no new information has been presented. Our business and the success of our fishermen and tenders is dependent on sustainable fisheries management. ADF&G continues to use effective and critical in-season management to determine if, when, and how a commercial herring harvest will occur. They do this in consultation with members of the Sitka Tribe. The extreme pulse nature of herring fisheries requires constant monitoring and adjustments to the fishery, all with subsistence harvest opportunities in mind. Over the years, significant changes have been made to the fishery at the BOF. Most notably is the continued expansion of the closed "core area".

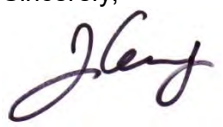
The herring fishery is sustainably managed and is very well understood. There is more data on Sitka herring than any other State managed fishery. The data for the Southeast herring resource spans at least 40 years, including age composition data, size at age, fish condition, biomass data, spawning biomass, annual miles of spawn, spawn deposition and density data and more. Sitka herring is acknowledged amongst the scientific community as one of the best available data sets for all herring resources in the Pacific. The Department of Fish and Game uses this data to manage the fishery conservatively and has done so since the fishery's inception in the 1970's.

Icicle has processed herring since the Sitka fishery began. We are committed to sustainable harvest as are our workers, fishermen and tender operators who live throughout the State of Alaska. Herring harvest is important to coastal Alaska communities like Petersburg where Icicle processes herring. Our engineers get in four weeks of work putting the processing line in, processing the herring, and then taking the processing line out. This work occurs when there is not much fishing activity in Southeast and gives critical employment to local residents. The truck drivers who work for AML get 2-3 weeks of work as well, and there is money in town that would otherwise not be there that goes to grocery stores, coffee shops, restaurants, laundromats, etc. Herring is important to our processing workers and key staff as well, and to the 50 or so people who work on tenders for a few extra weeks in the winter. This fishery impacts communities like Petersburg in the slow winter months.

There is no fishery conservation purpose or reason for this ACR. This ACR does not correct an error in a regulation. This ACR does not correct an effect on a fishery that was unforeseen when a regulation was adopted.

Once again, we extend an invitation to any member of the board to observe either the Sitka herring fishery or any of our statewide salmon fisheries. Thank you for the opportunity to comment. Please reach out if you have any questions.

Sincerely,



Julianne Curry
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Icy Strait SEAFOODS, INC.
Quality Alaskan Seafood

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Ph 360.734.8175 Fx 360.734.2203

hank@icystraitseafoods.com

October 2, 2018

Re: ACR-1, ACR-2

Alaska Board of Fisheries
Dear Chairman Jensen and Board of Fish Members:

Icy Strait Seafoods, Inc. is a processor in Juneau, Alaska with plants in Juneau and Hoonah. Both of our facilities are heavily dependent on the volume of hatchery summer chum salmon returning to Northern Southeast Alaska. We employ 80-100 workers at our Taku Fisheries plant in Juneau and another 40 workers at our Hoonah Cold Storage facility. We also employ 8 tenders and their crews for the season. Our plant workers, tender crews and fishermen buy fuel, groceries and other goods and services in both communities. Additionally, we pay raw fish taxes to the state of Alaska and 50% of the revenue is shared with the communities the fish are processed in.

We do not support ACR-1 and ACR-2. There isn't any real scientific basis to support either of these ACR's.

We have witnessed the continued responsible management by ADF&G's to ensure wild stock returns are not impacted by the harvest of hatchery chum salmon. Fishing areas are restricted and fishing time is reduced to ensure escapement goals are met for non-hatchery wild stocks.

We urge you to take no action on ACR-1 and ACR-2.

Regards,

Hank Baumgart, Pres.
Icy Strait Seafoods, Inc./Taku Fisheries

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October 2, 2018

Re: ACR 10

Alaska Board of Fisheries
Dear Chairman Jensen and Board of Fish Members:

I have been involved in the Sitka herring fishery for almost all of my adult life both as a fisherman and as a buyer/processor.

Under the sound management of the Alaska Department of Fish and Game I have witnessed the Sitka herring fishery quota rise in years of increased biomass and reduced in years that have had less linear miles of spawn and a lower biomass. The fishery is managed using sound science. The fishery has a biomass threshold of 25,000 tons. If the biomass is less than 25,000 tons the fishery does not open. As the biomass rises above 25,000 tons the conservation based model used by ADF&G provides for a harvest rate that begins at 12% and rises to a maximum harvest rate of 20%.

The success of ADF&G's science based management is proven in the data. In 1980 there were 63 nautical miles of spawn. In 2017 there were 62 nautical miles of spawn. And the average nautical miles of spawn over 38 years? 60, that's right 60 nautical miles! I don't know how anyone could do a better job of sustainably managing a fishery over 38 years than the Alaska Department of Fish and Game has done.

I therefore oppose ACR 10. I think we embark on a slippery slope when we start ignoring science to manage our fisheries. Where does it end and ultimately what happens to our renewable resources when science is thrown out the window?

I urge you to vote no on ACR 10.

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Regards,

Hank Baumgart, Pres. Icy Strait Seafoods, Inc./Taku Fisheries

Submitted By
Jakob Nelson
Submitted On
9/25/2018 9:10:53 AM
Affiliation

Members of the Board of Fisheries,

I am writing in OPPOSITION to ACR1 and ACR2 pertaining to hatchery production. I am a Lower Cook Inlet salmon seine permit holder and these proposals are in no way emergencies and should not be taken up out of cycle. Hatcheries are important to Alaskas fisheries and there is no scientific data to support thier claims. Its all propoganda and suppositional data. Thank You Jakob Nelson

Cordova District Fishermen United
PO Box 939 | 509 First Street
Cordova, AK 99574 | www.cdfu.org

October 3, 2018

John Jensen, Chairman
Glenn Haight, Executive Director
Alaska Board of Fisheries
Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115526
Juneau, AK 99811

RE: Comments on October 15-16 Work Session Agenda Change Requests

Dear Chairman Jensen and members of the Board of Fisheries,

Hatcheries have been a part of commercial fishing in Alaska for 45 years. During this time they have proven to be instrumental in keeping the commercial fishing industry sustainable, while at the same time coexisting with wild runs.

I am a third generation commercial fisherman. I was raised both gillnetting and seining out of Cordova, on the Copper River and in Prince William Sound. This means I have fished for both wild and hatchery salmon in both areas. I can say, from personal experience and ADF&G historical commercial harvest data that there have been large wild salmon returns during many of the years hatcheries have been operated. Clearly these numbers, provided by ADF&G, show a different reality than what is being portrayed by this emergency petition.

The Copper River, located just outside the entrance to PWS, has seen robust wild king salmon and silver salmon returns in the last 3 years, as well as record wild red salmon returns in the last 8 years. This year, the wild red salmon return was lower than forecasted on the Copper River which resulted in a closed commercial fishery and restrictions on personal use and sport fisheries upriver. At the same time, the system experienced a high king salmon return. Fortunately, the Gulkana red salmon hatchery stocks returned to the Copper River, allowing the mixed stock fishery to be executed in a conservative manner. This hatchery-produced harvest not only provided a limited opportunity for commercial fishing, but also made it possible for multiple user groups to utilize the resource. Without this vital Gulkana Hatchery run,

subsistence, personal use, and sport users would not have had the same opportunity and bounty that they enjoyed this season.

In years with lower wild returns and limited commercial fishing opportunity, hatchery salmon in Prince William Sound provide much needed resource for fishermen. With the Copper River district closed to commercial fishing for the majority of the 2018 red salmon season, the commercial fleet was able to concentrate fishing efforts on the hatchery runs in PWS. Each of these Alaskan small business owners depends on having the opportunity to fish for these crucial hatchery supported salmon runs.

Proper scientific method and evaluation is needed to fully explore the complex relationship that hatchery salmon have with their environment. The current RPT process for determining hatchery production is rooted in science, working data, and experience, and therefore is a more effective system to determine hatchery policy. The multi-agency scientific study currently underway is a step in the right direction for answering more questions and furthering our understanding of how hatcheries effect and interact with wild salmon populations.

Additionally, the requirements for an agenda change request have not been met. The staff comments from ADF&G cover these aspects. I urge the board to consider this letter and reject the ACR as it does not meet the required criteria and is not an effective way to manage our hatcheries.

James Honkola
Gillnet Division Chair
Cordova District Fishermen United

Submitted By
James moore
Submitted On
10/3/2018 1:21:51 PM
Affiliation
ATA, NSRAA, AKI

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aljac47@yahoo.com
Address
P.O. Box 770
Haines, Alaska 99827

Re: oppose ACR 1 and ACR 2 I am a commercial troller having fished SEAlaskan waters since 1970 I currently serve on NSRAA and AKI boards of directors and as Vice President of Alaska Trollers's Association. I have served on JRPT and can personally attest to the rigorous precautionary principles and sustainable fisheries policies guiding the permitting process for our aquaculture projects! I cannot stress enough how important our hatchery program is to our Troll industry and I feel I should point out that much of the infrastructure and funding of our aquaculture programs has been mitigation for the extreme reductions in our Troll harvest share of Chinook under the Pacific Salmon Treaty. This mitigation is an important component in the recent agreement which about to be ratified by the U.S. and Canada. The livelihoods of many fishing families in SE are heavily dependent on this wonderfully successful program.

Submitted By
Janet Sacora
Submitted On
10/3/2018 2:20:47 PM
Affiliation
None

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9641 Grover Drive
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I am strongly opposed to limitlng the hatchery production of salmon in Alaska. The ripple effect of this limitation would resonate throughout all of the coastal communities that rely on this valuable resource, and would be felt even beyond that. As Alaska grows and changes, we need to change with it or be left behind. The new technology that hatcheries can offer to expand this resource should be encouraged. Our efforts need to be directed toward working together to supporting this resource, which is valued to Alaskans and beyond.

Submitted By
Jason Lee
Submitted On
10/3/2018 3:00:30 PM
Affiliation

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P.O. box 1441
Cordova, Alaska 99574

As a commercial and subsistence user, my family and I rely heavily upon both wild and hatchery stocks. Healthy 'mixed' stocks are absolutely in our families interest. Considering a reduction in hatchery production without a thorough scientific reviewing process, is a rash and reckless move. I would ask you to step back and take a wider perspective, and consult the scientific community. This is a relatively new area of research and we need full review. The ADF&G has also stated their position.

It is common local knowledge that all stocks of salmon stray into other river systems. We really don't know to what degree this happens. However I do know, an 'emergency petition' or abruptly changing the agenda to rule on a hatchery reduction, would cheat a fair evaluation on the matter. We need to follow the Scientific community and be patient as research progresses. I believe we will see that hatcheries benefit all user groups and look forward to discussing this more in the future.

Thank you for your service.

Thank you for your time, service and consideration,

Jason Lee