

On-Time Public Comment List

Alaska Board of Fisheries | Work Session
October 15-16, 2020

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September 30, 2020

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

To Members of the Board of Fisheries:

Please consider Ahtna Tene Nene' CT Committee's comments on ACR submitted by Faye Ewan. We support ACR as written by Faye Ewan.

Proposal XXX by Faye Ewan to change 5 AAC 01.647 to collect spawning escapement data on specific streams to use for use in management meets the criteria:

- For a fishery conservation purpose or reason

Streams such as Tanada, and Long Lake, Mendletna Creek, and other indicator streams should have management plan in place to monitor escapement goals for sockeyes, chinook, and coho salmon. Commercial harvest data and Miles Lake sonar fish count does not consider all brood stocks and and run timing of salmon, and spawning escapement of sockeye, coho and chinook salmon.

Low escapement sockeye and chinook returns this past summer could have had substantial fisheries data collection added to management of fisheries in the Copper River Management Plan, if such a fisheries data collection of spawning escapement on streams was in this management plan.

Storia Stickeren for John Dye
John Dye, Chair
Ahtna Tene Nene' CT Committee

September 30, 2020
Date



Ben Van Alen
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July 26, 2020

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

Subject: Proposal EF-F20-122

Dear Mr. Haight,

I just received your July 22, 2020 letter stating that you do not plan to include my proposal EF-F20-122 in the proposal book. When I submitted this proposal on the Board of Fisheries online proposal submission form I did by best to clearly state, in section #2, new information for how hatchery salmon are incompatible with the State's Constitutional mandate to manage natural resources on a sustained yield basis, what will happen if nothing is done to limit hatchery releases (i.e., "The sustaining and rebuilding of wild runs is impossible in the face of continued hatchery releases."); and, in section #3, my recommended solution with draft regulatory language.

Given the inconvenience of questioning Alaska's 40+ years of industrial hatchery releases I understand the convenience of excluding this proposal on procedural grounds. Nevertheless, stocks and fisheries are collapsing in Southeast Alaska and it is well past time for the Board and participants to learn more about how hatcheries supplant wild resources and discuss what to do about it.

My "releasing salmon from hatcheries is unlawful" recommendation is my recommended solution but participants and the Board should have the opportunity to discuss and develop their own recommendations to help address issues in this proposal. The Board might take regulatory actions to modify permitted release numbers or harvest (release) locations as allowed in Sec. 16.10.440. The Board could limit how big the fish are when they are released to lessen the survival advantage that super-sized hatchery fish might have on wild fish. For Chum and Pink Salmon this might be to allow only volitional releases of un-fed fry. The Board might make formal requests to the Commissioner on the issuing and renewing of permits. The Board has considered proposals to modify hatchery permit conditions and made formal requests of the Commissioner in many past meetings.

This proposal, and others like it, must be considered at this Board meeting since runs and harvests of wild and hatchery salmon in Southeast Alaska are now nearing the mid-1970s need-to-rebuild levels. The time for emergency management actions is now and this proposal could help the Board take constructive action. Again, decades of industrial-scale hatchery releases have proven they have no place in the rebuilding and sustaining of wild runs.

Sincerely,

Ben Van Alen, Fish Biologist



Submitted By
Ben Van Alen
Submitted On
9/30/2020 8:55:52 PM
Affiliation
independent researcher

The data presented in the Department of Fish and Game's, September 28, 2020, Memorandum 'Prince William Sound Management Area Stock of Concern Recommendations' supports listing the Northern District Chum Salmon stock as a 'Stock of Concern'. Annual escapement indices for Northern District Chum Salmon have been below the lower goal of 28,000 fish 3 of the past 4 years, 4 of the past 6 years, and 5 of the past 8 years (see Table 1 in the memorandum). Furthermore, the frequency of below-goal escapements has increased in recent years in all five districts over the past 10 years too:

Year	Number and Percent of the five regions at or below goal	
2010	0	0%
2011	0	0%
2012	1	20%
2013	1	20%
2014	3	60%
2015	1	20%
2016	3	60%
2017	2	40%
2018	2	40%
2019	4	80%

The Memorandum and data raise several questions:

1. How are observer-specific counting rates accounted for in these escapement counts?
2. How are stray hatchery chum salmon accounted for in these escapement counts?
3. Are there corresponding downward trends in the harvests of chum salmon in these Districts?
4. What is the pattern of wild chum salmon escapements since Statehood?
5. Given the information above, why not err on the side of caution and list the Northern District Chum Salmon as a Stock of Concern? Why not list wild chum salmon in all five Prince William Sound Districts as Stocks of Concern?
6. Finally, why different goal ranges for odd and even year Pink Salmon? Climatic, stream, and spawner distributions are not odd or even so there should be only one set of goal ranges – whichever goal range is the highest. In this case, the even year runs are less than the odd year runs only because parent year escapements have been less in the even years. It takes fish to make fish.



Submitted By
Ben Van Alen
Submitted On
9/30/2020 5:04:26 PM
Affiliation
independent researcher

Make no changes to the 71,000-80,000 Sustainable Escapement Goal (SEG) range for Sockeye Salmon in the Taku River. The Department has not provided enough information to justify their proposal to lower the escapement goal range for Sockeye Salmon in the Taku River to 40,000-75,000 fish. Their justification for calling the new goal range a BEG (biological escapement goal) instead of a SEG is also lacking.

The information provided in ADFG's March 4, 2020 'Southeast Region Salmon Escapement Goal Memorandum', and the Heini et al. 2017, Miller and Pestal 2020, and TTC 2019 references it cites, does not include the data that allows the reader to do an independent analysis of either: 1) the Taku River Sockeye Salmon fishwheel mark-recapture data for in- and post-season estimates of the inriver escapement; or 2) the Taku River Sockeye Salmon stock-recruit data for estimating escapement goal ranges.

I am not so concerned about not getting the fishwheel mark-recapture data since it appears the fixed 22% adjustment for tag loss was applied in all years which simply shifts the new escapement estimates down 22%. This timely and expensive exercise was really not needed – the escapement estimates and goal ranges will be shifted down a fixed percentage but management objectives and actions will be unaffected. It is changes over time in methods or survival/environmental conditions that complicate stock-recruit assessments of escapement goals. Using tag loss results from intensively handled radio tagged and spaghetti tagged fish to 'correct' for tag loss in minimally handled spaghetti tagged fish is apples-to-oranges. Radio tagged fish are definitely more susceptible to predation, tag regurgitation, and migration delays than fish that are quickly spaghetti tagged and released. I recommend making no changes in marking and recovery methods so past and future estimates are comparable, but the best, minimal handling, fastest, and cheapest mark should probably be used – the adipose fin clip. Floy-tags with an adipose clip were used before the switch to spaghetti tags. An independent reviewer would need the weekly mark-recapture data to evaluate either the mark type or the abundance estimation methods.

Regarding the stock-recruit data used to reassess escapement goal ranges, the Board and public should be provided the basic estimates of the escapements and returns by brood year since 1983. Based on my experience with other datasets, and what I read in these documents, I think it is neither risk-adverse or appropriate to lower the escapement goal ranges for Taku River Sockeye Salmon. The new analysis does not include estimates of the substantial harvest of Taku River Sockeye Salmon outside of District 111 (i.e., in the Northern Inside commercial purse seine fisheries), the importance of carcass-derived nutrients to system productivity, or the impact of production releases of hatchery Chum, Coho, Sockeye, and Chinook Salmon in the area and region, or the impact of back-planting thousands of artificially mated, incubated, and reared Sockeye Salmon into Tatsamenie and Trapper Lakes. I can find no reference to historical run strengths which are an important touchstone for assessing escapement goals too.

The bottom line - there is no need to lower goals at this time and more data and analysis would be needed to justify doing so.



From: [Chris Guggenbickler](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: SE BOF Proposals
Date: Wednesday, September 30, 2020 3:27:02 PM

Dear Board of Fish members,

As a SE Advisory Committee (AC) chair I would ask you to consider how we will conduct safe AC meetings in preparation for a spring BOF meeting. The AC process is paramount for public participation by local stakeholders in the BOF process. As many individuals struggle with technology and the means to do so I hope you will consider how the State and board support will supply and support the means for public participation. This stakeholder participation should not be marginalized.

Thank you for the opportunity to comment on this subject.

Wrangell AC Chair
Chris Guggenbickler

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September 30, 2020

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

Members of the Alaska Board of Fisheries,

Cordova District Fishermen United is a 501(c)5 non-profit organization that advocates on behalf of the commercial fishing fleet of the Copper River, Prince William Sound. CDFU is a regular presence at Board of Fisheries meetings and we value the established relationships we have built with members of the Board, members of various user groups around the state, and state employees during these meetings. We value and appreciate the open public process that exists with the current Board of Fisheries structure, and regarding the covid-19 pandemic have the following concerns:

It is of utmost importance to keep the integrity of Board of Fisheries meetings intact, and as regular participants in these meetings, see no feasible way how this can be done online or in any virtual capacity. There are also concerns for limiting public access and participation if the number of attendees were to be capped in any way. Further, it is difficult to ascertain what level of precautions will be necessary 6 months from now, which therefore makes it difficult to plan potential meeting dates.

With this in mind, we are appreciative of the Board's decision to postpone the 2020 Prince William Sound meeting until at minimum, March of 2021. However, we encourage the Board to remember that there are active finfish and shellfish fisheries happening in Prince William Sound during both March and April, and holding the Prince William Sound meeting during this time could potentially limit public participation from those who are actively engaging in some of the very fisheries this meeting will be addressing. That said, it is absolutely critical that if the meeting is not postponed to December of 2021 and if it must occur before the end of the State of Alaska's fiscal year, that this meeting take place prior to the end of April, far in advance of the mid-May start date for the commercial and subsistence salmon seasons in Prince William Sound, which would disproportionately exclude fishery participants from within our region.



We also encourage the Board of Fisheries Board Support Section to work with the local communities on ensuring that adequate testing is accessible and available for any in-person meetings held prior to the end of the pandemic, in order to protect members of the public and rural communities from further potential outbreaks.

Thank you for your time and consideration of our comments,

Chelsea Haisman
Executive Director



Submitted By
GALE K. VICK
Submitted On
9/30/2020 11:36:34 PM
Affiliation

I am writing to request the following consideration for the Work Session: Regardless of changes in other board meeting schedules, conduct a Hatchery Committee meeting by Zoom in March, as scheduled, for the benefit of presenting Department reports and science review updates. Allow for the normal commentary procedure. This would be preparatory to the PWS re-scheduled meeting. Thank you.
Gale K. Vick, Fairbanks



Submitted By
John Krieg
Submitted On
9/30/2020 6:03:34 PM
Affiliation
Comercial fisherman

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North Pole, Alaska 99705

Something must be done about the terrible salmon runs on the Yukon River and its drainages. Many people depend on these runs and suffer when they are not allowed to fish. The 2020 runs weren't just bad they were the worst since records were being kept. This is inexcusable and when we are told no one knows what caused the low run, then no one knows how to prevent it from happening again in the future. There are probably several factors that caused the poor runs throughout the state. Scientists have studied this and written many articles on the subject of this year's poor run and the fact that the fish are getting smaller. They point to warmer ocean water and competition for food. While it would be hard to cool the ocean, we could help our wild stocks food supply by cutting the hatchery outputs. This has been proposed before and many believe we wouldn't be in the situation we are today if these proposals would have been adopted. I suggest cutting hatchery outputs by 50 percent and let our wild stocks recover. The hatcheries are supposed to help our wild stocks and NOT compete with them for the available food sources.

Thank you for your time

John Krieg



From: [Krisy Hanson](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Cook Inlet 20-21 changes
Date: Sunday, August 2, 2020 5:39:02 PM

How do I get notification of the changes for next year? I am hopeful dfg has taken all types of fishing in to consideration, not just restricting the drift fleet who are struggling to feed their families.

Last year Kenai had a 5 million fish run yet dfg restricted us to 1.7 million. That over escapement and poor management.

The Kenai River should be managed for all those to have enough fish. Subsistence fishing is not monitored as it should be. History will support over escaping means for low returns.

Please find the scientific balance without starving the commercial fisherman who depend on a profitable harvest. Some families have been here for over 80 years and more. Alaska and Kenia are losing processors.

Respectfully
Krisy Hanson

Sent from my I phone
Krisy Hanson



From: [Mike Swan](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Alaska 2021 non resident charter limits / please assist
Date: Friday, August 21, 2020 7:04:25 PM

DFG staff,

I'm an annual non resident fisherman. Due to the August 11 travel mandate we were forced to cancel our Kodiak trip of 5 parties for August 22. We were so excited about the increased limited to entice tourists. Well, our skipper now has \$5200 of our trip money and has offered us the same week for 2021. Let's hope he and I are "still in Business." Please consider maintaining the increased non resident limits to bring us all back in 2021. My father and brother were laid to rest on The Buskin River. My duty is to now take my uncle's remains to lay with them. A duty and honor I need to keep while fishing with the rest of my family so they will know of my final resting place and plans

Mike Swan
619-884-9367
San Diego
Sent from my iPhone



Submitted By
Scott Wagner
Submitted On
9/30/2020 11:24:45 AM
Affiliation
NSRAA

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Sept 30, 2020

Alaska Board of Fisheries

Ms. Marit Carlson-Van Dort, Chair

Dear Chair Carlson-Van Dort and members of the Board of Fisheries,

On behalf of Northern Southeast Regional Aquaculture Association (NSRAA) I am submitting these comments regarding the upcoming BOF Work Session and potential discussion of taking up time sensitive proposals prior to the 2021 commercial salmon season in a non-traditional meeting setting. NSRAA does not have any association proposals before the board in the 2020/2021 cycle. However, there are two proposals submitted by Pioneer Alaskan Fisheries INC, 101 and 103, that have the potential to significantly affect our organization and the fishermen we represent. These two proposals are not time sensitive in nature, and should be taken up when in-person BOF meetings can be safely held.

These two proposals, along with 4 others submitted by same organization for the Prince William Sound region, seek large scale modification of Hatchery Salmon Management Plans and Allocation Management Plans. ACR proposals submitted last year by same author listed similar concerns regarding hatchery operations and these proposals were not taken up out of cycle. Proposals 101 and 103, along with the others for PWS, deserve to be taken up when in-person meetings are possible. These Management Plans are the product of input from ADFG staff, hatchery operators, commercial salmon fishermen and the public at large. To **significantly** modify these in a non-traditional BOF meeting setting would be a disservice to the individuals and the collaborative nature that created them.

Sincerely,

Scott Wagner

NSRAA

General Manager



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Date: Monday, September 21, 2020 8:51:42 PM
Attachments: [Letter to State of Alaska Department of Fish and Game.docx](#)

For regulatory changes.
You need to consider ,stopping this dipnet fishery.

The 2/5 year fish scales samples 5years ago as not done.
Ucida did them ,indication was ,zero fry return to the ocean ,conclusion all fish was taken by
dipnet ,and sport fish on the Kenai.



Ron Carmon
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Attn: State of Alaska Department of Fish and Game Ombudsman

It is time to look at the impact of personal use fisheries and the impact it has on our local waters, state economy, and the worlds waters.

First, I'd like to discuss the environment of the ocean in relationship to acidity and the importance of plankton eaters, such as sockeye salmon, to the spawning grounds in the rivers and the impact of the ecosystem in the ocean. Secondly, I'd like to discuss is the economic impact of the fishing regulations on the Kenai Peninsula borough. Over the last 30 years, the dipnet fishery on the peninsula has taken \$542 million each year in fish from just the two rivers, Kenai and Kasilof. They also fish other rivers on the peninsula. Thirdly, I would like to explore the moral responsibility of the State of Alaska to manage our fishery. Finally, I would like to present a solution that would ensure the viability of all parties in the industry and a sustained fishery.

The Sport Fishing Association and Coastal Conservation take \$300 million retail value off these two rivers. Almost zero dollars of income goes to the Kenai Borough, the State of Alaska, or its citizens. The amount of the Alaska general fund in the last 30 years has been down by \$70 million each year. This is a result of the fish going to the dip net fishery and sport guide fishery and not the commercial fishery- who pays into the general fund.

This has been done now for 30 years. Kenai Borough's revenue could be drastically improved. I believe the Sport Fishing Association has removed a total of \$44 billion of fish off the Kenai Peninsula alone over the past 30 years. We can do better than that. Selling the fish saves the Kenai Peninsula and the State of Alaska thus providing an improved income source.

For a long time, ADF&G has managed our fishery- our commercial fishery, our sport fishery, subsistence fishery, and personal use fishery. In 1984, Tony Knowles came up with the idea to start the Board of Fisheries to efficiently manage the types of fishing statewide.

The people who live on the Kenai Peninsula want the practice of catch and release stopped. It's killing the prime targeted fish. The people on the Kenai Peninsula want the dipnet fishery discontinued. If the practice of dip netting fish cannot be ceased, the people of the Kenai Peninsula would like the number of allowed fish to be decreased.

The Sports Fishermen Guide Association is allowed over 300 days of sport fishing on the ocean around the Kenai Peninsula. They are allowed 150-170 days on the Kenai and Kasilof rivers alone. The Sport Fishing Guide Association can have 6.4 million guides in the United States, and they frequent the Kenai Peninsula. They fish all species of fish on the peninsula. In 2018, sports fishermen took 179,000 halibut, 229,000 sockeye salmon, 31,400 king salmon, 60,000 silver, 40,000 non-pelagic cod, and 40,000 pelagic cod. According to the logs noted from the Department of Fish and Game, in 1984, 85 and 86, the guides took 3 to 4 million sockeye salmon, plankton eaters, just off the Kenai River alone. In 1984, they took



110,000 king salmon. There is a moral obligation that the state must take to save our fishery and they are not doing it.

There's a legal obligation to the other fisheries also. The Sport Fishing Guide Association is fighting for the personal use fishery. Why would the Sport Fishing Guide Association want personal use? I believe that's a personal attack against the commercial fishery. The more fish they get up the river the better for the sports fishermen. Over the years 110,000 people come down from Anchorage and other parts of Alaska to harvest 7 million fish a year by dip netting on the Kasilof and Kenai Rivers. There is also a legal battle that has been won by the commercial fishermen. Federal laws state you cannot ruin a fishery to support another fishery. This has been going on for 30 years now. There are many reasons change these practices from the last 30 years.

The ocean's acidity level is up. The taking of sockeye salmon, crab, and pollock has taken a toll. These fish and crab are critical in balancing the acidity level in the ocean. Killing sockeye salmon in the river has a criminal effect on the ecosystem. Overpopulation of the river with too many sockeye salmon will also kill the river salmon run. It's important to ensure the ecosystem of the rivers is maintained for the salmon fry to leave the river. The Kenai River sonar is the only sonar system that's proven not to work. Sonar systems worldwide have been proven better than the sonar system used in the Kenai River. There are better ways to count fish and monitor what's going up and down the river. But most importantly, we need sockeye salmon to have a safe space safe place to stay- not a playground for the practice of the blood sport of catch and release.

The practice of catch and release was put in so the guides could work their boats 18 hours each day, every day of the week. This must stop. The commercial fisherman fishery in Cook Inlet is allowed anywhere from one to 15 days to fish. Our canneries and processing plants can't get enough fish to economically stay running. The costs to clean up these sites, after the canneries are no longer viable, will be in the billions of dollars due to environmental clean-up. They are falling apart every day. The canneries are right on the edge of the water and they are a mess- an ecological nightmare waiting to happen. ADF&G and the Board of Fisheries will be to blame.

This was a vibrant fishery. In fact, it was the second biggest fishery in the world. It generated over 100 million dollars of income in the 1980s and it will all be wiped out. The \$68 billion that the state has in its Permanent Fund account will go to clean up these dilapidated canneries on the river.

Remember, a lawsuit has already been won and the people of the Kenai Peninsula are asking the Board of Fisheries to step up and stop this practice. There are better ways to run this fishery. It's not about who gets the fish, or who the fish belong to, but who has killed the Alaskan salmon industry. Over the last 30 years, we had the freshest market salmon sold in the United States. It was proudly on display and sold daily. We've lost that part of the market because the politicians and the State of Alaska have taken our marketing away along with the industry. Again, I say there's a better way to manage our fishing industry

My solution is to ask the Coastal Conservation Association, Bass Pro Shop and the 20,000 other box store vendors who supply the commercial guide-sport industry to pay back the money owed to the other fishermen in the Cook Inlet fishery. The price would be \$44 billion.

I believe each fisherman, set netter, and drift fisherman needs 3 million dollars tax-free money (permits will go away) just to catch up what has been lost over the last 30 years for these approx. 2000 fishermen.



By doing this, the state of Alaska could take away commercial fishing permits. Some people paid up to \$260,000 for these permits years ago. I personally paid \$83,120 in permits and licenses in the past 6 years. The practice of purchasing permits would no longer be necessary. Commercial fishermen could fish without purchasing a costly permit. I think the retailers would be willing to pay the \$44 billion because they need to sell their fishing supplies, boats, and equipment to the local sport commercial fishermen who would now have more liquid funds.

The annual income collected from permits whose funds go toward Coastal Conservation can be passed onto Bass Pro Shops and the local vendors. These vendors have already collected 30 years of income from expert guides who have not paid any funds for the Alaskan fish. They fish for free, reap the bounty of the Alaskan waters. They have not been required to obtain a license for the last 30 years. With my plan, the Sports Guide Association must purchase a license. Not one single user group would be impacted as the cost would be spread throughout the industry. The only significant impact would be if the fishery dies off completely due to poor management.

I believe it will get better, though. The Sport Guide Association will have to buy a license and sport guides will have to catch their fish in oceans rather than the river, just like commercial fishermen do. But as the river becomes healthy, so will the fishery. The environmental damage from the canneries will be fixed by their own dollars. Commercial fishing will improve, and the cannery industry will survive. Using personal fishing as a way of subsistence is a lie. This must stop. Subsistence fishing can be regulated. Only set-net and drift-net fishermen who want to fish can fish, but I believe most of them will quit. The market will determine this outcome.

The sockeye salmon, plankton eaters, must have a safe place in the river to spawn. It must be protected like a sanctuary. I believe you can sport fish the river, but I don't believe it should be open for commercial fishing. The industry of commercial sport guides is a commercial business. They take a lot of our fish. The rest of the money, the \$40 billion the state gets from Bass Pro Shops, the box stores, and Coastal Conservation, which was taken off of the ocean floor, belongs to the state of Alaska.

When considering how to manage these fish, who are a lifeline in our oceans, we must ask ourselves these questions:

Is personal use fishing,

A threat to our immediate environment and our planet? Yes.

A threat to our economy? Yes.

Unregulated? Yes.

Unenforced? Yes.

Overall, detrimental not to have? No.

Commercial fishing for sockeye salmon has been the primary source of income for much of the Kenai Peninsula and other areas in Alaska. Politicians are raiding the Permanent Fund because our state is in an economic crisis. Changing policies towards protecting these sanctuaries and regulating the harvesting of the fish will certainly create a revenue source that is untapped at this time.



I urge you to let these fish come back to the rivers, spawn, and grow the population allowing for an improved balance in the oceans. Allow fishing to only be in the oceans, prevent the blood sport of catch and release to occur. There is a grander picture and the opportunity is now to change the world's waters for the better.

Ombudsman, I would like you to rule this personal use fishery as illegal. The federal courts have already ruled that guide fishing is illegal and took away profits from the commercial fishery. A striving, premiere commercial fishery has now been degraded into common use and guide industry.

Sincerely,

Ron Carmon

Kenai, Alaska



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September 30, 2020

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

Re: BOF Meetings During the 2020/2021 Meeting Cycle

Dear Chairperson Carlson-Van Dort and the Alaska Board of Fisheries,

Thank you for the opportunity to comment about postponing the Southeast January 2021 meeting. Southeast Alaska Seiners Association (SEAS) appreciates that the BOF shares our views about the necessity to hold the meetings in person. The value of the process and the stakeholder's involvement and access to staff and the Board was reiterated by almost everyone at the Special Teleconference meeting on September 16th. That said, postponing until April or May disenfranchises the very stakeholders most of these proposals affect. Fishermen participate in a number of fisheries prior to and after the traditional salmon fishing season, and thus would not be able to participate in person, which is the intent of postponing. We would like the Board to seriously consider moving all scheduled meeting cycles back an entire year, and resetting the 3-year rotation cycle.

Groups prepare for months for these meetings. The fluidity of Covid-19 cases in a particular region makes the possibility of cancelling or restricting attendance numbers and changing meeting formats extremely likely if the meetings are held in early Spring. Pushing back all cycles by one year gives some level of confidence that there will be significant measures developed that will ensure everyone's safety and thus the ability to fully participate. Deadlines for comments and meeting dates will not be moving targets, and budget concerns around doubling up the meetings will be eliminated.

The Board could give Fish and Game the authority to add a year to the sunset dates of any regulations that will expire prior to the "new" meeting cycle year. Many of these regulations with sunset dates, at least in Southeast, were positions the gear groups agreed upon through compromise. To extend those positions an additional year, rather than perhaps adopting entirely new strategies because fishermen



were not in the room to advance their cause, is a much more advantageous outcome for everyone. The Board could hold on-line meetings to address issues that Board Support or Management deem essential, like “stocks of concern”.

The whole issue of the Advisory Committee process and how that will continue to function as an integral part of the BOF process has not gotten much attention. The Advisory Committee in Ketchikan has not met since the Covid-19 situation started. There is no clear path forward in an April/May postponement as to how these committees would meet and deliver local comments and concerns to the Board.

Thank you for your consideration of our views and opinions on this matter.

Sincerely,

A handwritten signature in blue ink that reads "Susan Doherty".

Susan Doherty
Executive Director SEAS



Southern SE Regional Aquaculture Association

14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348

September 30, 2020

Alaska Board of Fisheries
Ms. Märit Carlson-Van Dort, Chair

By Electronic Copy Only: dfg.bof.comments@alaska.gov

Re: Comments for Hatchery Work Session, October 15-16, 2020

Dear Chair Carlson-Van Dort and members of the Board of Fisheries,

The Southern Southeast Regional Aquaculture Association (SSRAA) is a regional non-profit salmon hatchery organization formed under state and federal law in 1976.

The purpose of these comments is to provide additional information and request priority consideration for Proposals 105 and 106, which SSRAA submitted for the delayed *Southeast and Yakutat Finfish and Shellfish* meeting. SSRAA requests that these proposals be heard and decided upon prior to the 2021 summer salmon fishing season, based on the following circumstances and reasoning:

1. Proposal 105: Port Saint Nicholas Terminal Harvest Area Salmon Management Plan. This management plan is intended to distribute the harvest of hatchery produced Chinook salmon in the Port Saint Nicholas (PSN) Terminal Harvest Area (THA) between the purse seine, troll and drift gillnet fleets. These users, along with other common property fishers in the terminal area, are expected to catch a majority of the terminal fish. SSRAA will clean up the remaining Chinook salmon as cost recovery.

In 2018, SSRAA moved 200,000 Chinook smolt from Neets Bay to PSN in response to Unuk River stock of concern issues, as Unuk Chinook pass through Neets Bay and are intercepted during the Neets Bay rotational fisheries. Relocating these fish to PSN removed them from the Behm Canal corridor to enable better management by ADF&G of the Unuk River stock and allow more fishing opportunity on SSRAA-produced Chinook. The total PSN release thus increased from 100,000 to 300,000 Chinook smolt in 2018. THA regulations in Neets Bay consisted of an early rotational fishery for the seine and gillnet fleets, along with continuous troll opportunity to target the 200,000 Chinook release. Since there is no THA at PSN yet, there are no rotational fisheries for any gear

groups. 2021 marks the first year that the dominant Chinook age-class will be returning to PSN, making the timing to address Proposal 105 critical.

SSRAA requests that the Board prioritize this as an on-time agenda item to avoid the allocation issues presented by having these fish come back without a plan to manage them.



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2. Proposal 106: Modification of the Port Saint Nicholas Special Harvest Area. A Special Harvest Area (SHA) was previously established at PSN and has been used successfully to harvest the modest number of returning Chinook for cost recovery. However, due to the aforementioned increase in PSN Chinook smolt releases, an expanded area for cost recovery is needed to successfully capture the additional returning adult Chinook, as well as expanding the allowed gear types to include set and drift gillnet.

SSRAA requests that the Board prioritize this as an on-time agenda item so that SSRAA can effectively prosecute cost recovery harvest on Chinook salmon returning to PSN in 2021.

This Board of Fisheries meeting cycle is SSRAA's first opportunity to request regulation changes at PSN. The now-defunct Prince of Wales Hatchery Association (POWHA) had the PSN programs prior to 2015. Since then, SSRAA has assumed these programs as well as all of POWHA's Klawock River Hatchery programs.

Thank you for your consideration of these comments.

A handwritten signature in black ink, appearing to read "David Landis".

David Landis
General Manager



From: [Rintala, Jessalynn F. \(DFG\)](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: steven anderson message
Date: Thursday, August 13, 2020 1:25:48 PM

My reason for the contact is because I am a resident of Alaska and also reside in Wisconsin. I have obtained or was awarded caribou tags for the 562 hunt in Ak.. Though I would love to travel to Alaska for this hunt, I now no I would have to be quarantined at both the Canadian border first then again at the Tok border which would cost me a month of time and cost and living in my truck. Though this would be OK I rather not spend my trip in my truck and also the fact I would have to again be quarantined on my return trip. Now the reason for the long book message is I was forwarded to you to talk, inform or I do not know. Though I would love to be in Alaska now again the pandemic is stopping us all from enjoying or carrying out our plans. So at this time I would ask or request that somehow or somehow that Alaska will allow these tags to be valid for the next year. My belief is the herd will grow to an overpopulated size and cause problems or control. Yes they can increase the tags the next year, though people like me who have continually help control this and enjoy this hunt and trip will probably lose our tags for the next year. This includes my moose hunting tag also. So again I ask that the board finds a way to deal with this matter.

My wish would be you stop the king fishing because of the pandemic and let them grow and reproduce, as I see there is an emergency order now. Though again the commercial fisherman have already done the damage. They should be a very short fishing season for them. So again so.e direction or just a notice of my opinion for future reference. My hope and plan is to look forward to a trip back again as possible for 2021. Thank you for your time and allowing me to fill your phone with a book of a text message.
Steven anderson



*Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org*

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

Comments for Work Session October 15-16, 2020

Dear Board of Fisheries members,

United Southeast Alaska Gillnetters would like to offer some considerations in deciding the meeting dates for the SE Finfish/Shellfish originally set for January of 2021 in Ketchikan.

Consider first that these meeting dates have always been in the dead of winter for a reason. The vast majority of the commercial fisheries in our region are closed. This allows for optimum participation in the process by stakeholders and the public at large.

Consider that if the SE meeting were held in March, it is likely that stakeholders in the herring pound fishery, Sitka Sac Roe, halibut and blackcod fisheries, and possibly golden king crab fishery, would have their participation marginalized. Were the aforementioned meeting held in April or May, longlining, possibly Sitka Sac Roe and golden king crab could be underway. April and May are also very important months the commercial fleet spends readying gear and vessels for the upcoming summer season. We would imagine that these months are also vitally important to lodge owners and charter operations for the same reason.

Consider the workload for the department staff if a regional meeting is held during the month of March, April, or May. Some staff may be actively managing fisheries underway. Managers will likely be preparing for the upcoming salmon season, writing management plans, participating in Pacific Salmon Commission meetings, or diving for herring spawn deposition. Board Support is likely to be taking proposals for upcoming meetings. Board members may find that having meetings this late in the year would have an effect on their businesses.

Consider that the Board of Fisheries is a very public process. A meeting that is held that will knowingly marginalize public participation, regardless of circumstance, should not be considered. We would think public participation would be among the highest-ranking



considerations, because it literally defines the entire process. We have participated in process for years, and recognize how unique and precious it is.

Consider that local Advisory Committees have not been instructed as to how we will have meetings to consider the proposals for the upcoming meeting. Some of our board members and myself are active on our local AC's and have serious questions regarding this. AC meetings are public and must be notified. Virtual meetings are a possibility, but would require time and energy from Board Support. Platforms for virtual meetings aren't free for meetings that last for hours. While many of us have participated in virtual meetings, many in the general public have not, which may marginalize their ability to participate. It may also require facilitation by Board Support staff, which would mean overtime pay since most AC meetings are after business hours to facilitate participation. It would also require coordination of AC meetings within the region to facilitate staff, something that could be a real challenge.

Our position on the meeting in region hasn't changed. We would prefer to have the meeting as originally scheduled. If that is not possible, we would rather it be moved out a year, to January 2022, so a fully public process could be observed.

As always, we appreciate the opportunity to comment.

Regards,

A handwritten signature in black ink, appearing to read "Max Worhatch".

Max Worhatch, Executive Director



Submitted By
Victoria OConnell Curran
Submitted On
9/28/2020 7:46:32 PM
Affiliation
self

ACR 2 does not meet the criteria for an ACR and should not be taken up out of cycle.

I do not support the change in definition of rockfish in ACR 2. Slope rockfish are deep water rockfish, many of which have more longevity than even yelloweye rockfish. Shortraker and rougheye, often caught with sablefish can live in excess of 120 years. They are vulnerable to overharvest and this is why there is no directed commercial fishery allowed for these species – they are bycatch only.

I believe that the Department already has the authority to set bag limits or restrictions by species within categories. If not, why not define the sportfish the rockfish categories with those already in the regulations for the commercial fishery: DSR, Pelagic, and Slope rockfish? Pelagic rockfish are generally shorter lived than the DSR and slope species. A bag limit could be set for the slope species that is reflective of bycatch only but may be greater than zero.

Another potential solution if sport fishermen are catching greenstriped and redstriped rockfish in shallow water while fishing for Pelagic rockfish would be to move these 2 species into the pelagic category, but do not move very long-lived deep water species into a category with less restrictions. They are easily overfished.