

**On-Time Public Comment List**  
**Prince William Sound and Upper Copper/Upper Susitna Finfish**  
**December 3–8, 2014**

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**On-Time Public Comment List  
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Submitted By  
Justin Maple  
Submitted On  
11/6/2014 3:50:31 PM  
Affiliation

Phone  
907 799 7466

Email  
[justinmaple@gmail.com](mailto:justinmaple@gmail.com)

Address  
1569 Snowbasin Road  
Fairbanks, Alaska 99709

I support the Chitina personal use fishery and proposals 38, 39, 41, 43 and 18. Many of us Alaskans depend on this fishery as our source of fish throughout the year and letting commercial interests outweigh the personal use fishery would be very unfortunate.



Submitted By

kent kendrick

Submitted On

11/8/2014 9:33:59 AM

Affiliation

support proposal # 18 - 38 - 39 - 41 - 43    oppose # 35 - 36 - 42 - 45



Submitted By  
Kory Blake  
Submitted On  
11/19/2014 8:07:06 PM  
Affiliation  
Commercial Fishermen

Phone  
907-429-7194  
Email  
[alaskakoryblake@gmail.com](mailto:alaskakoryblake@gmail.com)  
Address  
PO Box 1122  
Cordova, Alaska 99574

Proposal 1: Support - Provides more opportunity for subsistence users in Area E.

Proposal 2: Support - Provides more opportunity for subsistence users in Area E.

Proposal 3: Support - Saves on expenses for users.

Proposal 4: Support - No comment

Proposal 5: Support - No comment

Proposal 6: Support - Reduce mortality.

Proposal 10: Support - Bring allocation inline.

Proposal 11: Support - No comment

Proposal 12: Support - Gulkana hatchery fish over valued in allocation plan.

Proposal 13: Oppose - Allocation already favors seiners.

Proposal 14: Oppose - Allocation already favors seiners.

Proposal 18: Oppose - Not needed. 2014 no openers within inside waters or barrier islands until June 23, 2014.

Proposal 22: Support - No comment

Proposal 33: Oppose - Support current ADF&G goals.

Proposal 34: Support - No comment

Proposal 37: Support - Would provide necessary data on how many users and the harvest levels.

Proposal 38: Oppose - 2014, no inside openers for commercial fishermen until June 23. All users should share in the burden.

Proposal 39: Oppose - Copper River is a fully allocated fishery. Increasing bag limits for one user group will negatively impact the balance between all users.

Proposal 40: Support - Commercial fishermen have been held to rigorous reporting requirements. Charter operators should also be accountable. This will provide a realistic count on fish coming out of the Copper River fisheries.

Proposal 41: Oppose - When runs are small all user groups share in conservation.

Proposal 43: Oppose - There is no way to manage 3000 Kings without in season harvest information.

Proposal 44: Oppose - Escapement and harvest from previous years have been above maximum goals. The first three openers in the 2013 commercial fishery were fished outside of the barrier islands and were record catches. The commercial fishery was then closed for 13 days allowing over escapement of the early runs. The fish were holding in river above the commercial fishery and not going up to the counter. In the 2014 commercial fishery there were no inside the barrier island openers until June 23 causing above maximum escapement levels. Commercial fishermen have lost one third of their safest fishing area inside the barrier islands.

Proposal 45: Support - ADF&G also opposes mandatory closures.

Proposal 46: Oppose - Subsistence needs are met largely by home pack retention of commercially caught fish. Cordova has a unique two level ANS finding. Fish not retained for home pack would be sold commercially.

Proposal 47: Oppose - Not feasible harvest method for Copper River, would impose severe safety risk.



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2 of 2

Proposal 48: Support - No comment

Proposal 49: Oppose - Fully allocated resource. Sports fishermen are already catching Klutina Kings down river. Allowing sport fishing in spawning grounds is not prudent.



Submitted By  
Mary Bishop  
Submitted On  
11/21/2014 12:13:58 PM  
Affiliation  
self  
  
Phone  
907-455-6151  
Email  
[mbishop@ptialaska.net](mailto:mbishop@ptialaska.net)  
Address  
1555 Gus's Grind  
Fairbanks, Alaska 99709

I have only been dipnetting at Chitina twice -- but I have benefitted many times from family and friends who have dipnetted at Chitina. Our family eats almost entirely wild fish and game -- our boys grew up on wild foods. As 77 year olds, we continue to eat mostly wild fish and game -- much of which is gathered by our sons or friends. Our grandsons/daughters are working at this, too.

The Chitina fish have become more important to us in recent years because the Tanana king fishery has been closed. Years ago (30-50) we ate mostly Tanana chums for our fish. We can and would do that again if we have to. But we'd really like to have the opportunity that others enjoy of eating the Chitina reds that our family and friends provide us.

I encourage you to act favorably upon the comments provided by the Chitina Dipnetters Association.



Submitted By  
Maxwell Harvey  
Submitted On  
11/6/2014 1:23:13 PM  
Affiliation  
PWS Set Net Permit Holder

Proposed Changes in Regulations for the Department of Fish and Game

Proposal 10 - Changes to Allocation Plan - OPPOSED

These comments respond to the Board of Fisheries request for comments on Proposed Changes in Regulations for the Department of Fish and Game. I am a set gillnet permit holder in Prince William Sound.

This letter provides comments on Proposal 10 to change the allocation plan. I oppose Proposal 10, and urge the Board of Fisheries to reject this proposal.

Proposal 10 recommends eliminating the 1% threshold for triggering penalty measures on the set gillnet gear group, while maintaining a 5% threshold for triggering penalty measures for both the drift gillnet gear group and seine gear group. Proposal 10 suggests an unfair regulatory proposal that would eliminate any margin of error prior to triggering penalties for the set gillnet gear group, while maintaining a substantially larger penalty trigger point buffer for the other gear groups. This proposal is inequitable by proposing to penalize the gear group with the smallest allocation to begin with. A 0% threshold for the set gillnet gear group would be unfair, while the other groups enjoy a 5% margin.

At the last Board of Fisheries Meeting in Valdez, there was resounding support from most fishermen for no changes to allocation plan. I urge the Board of Fisheries to reject this proposal, and retain the current allocation plan because it is working.

Thank you for the opportunity to comment.





Submitted By  
Midnight Sun Chapter of TU  
Submitted On  
11/14/2014 3:11:06 PM  
Affiliation  
Trout Unlimited

Phone  
9074792676  
Email  
[jmorack@gci.net](mailto:jmorack@gci.net)  
Address  
1621 Wolverine Lane  
Fairbanks, Alaska 99709

The Midnight Sun Chapter of Trout Unlimited would like to make the following comments concerning proposals for the up coming Board of Fisheries meeting.

We considered proposals 50, 51, and 52 and voted to support Proposal 50 which would prohibit the use of barbed hooks, multiple hooks, and bait when fishing for king salmon in the Upper Copper/Upper Susitna Area. Our primary concern with the practices that are currently used is their effect on rainbow trout. Many rainbow trout are incidentally caught and injured or killed in this fishery and we would like to see measures employed to reduce this. We would also support any plan to educate fisherman about the proper techniques for catching and then releasing fish.

We also voted to not support Proposal 54 which would increase the bag and possession limit for grayling in the Gulkana River drainage. The present grayling population is healthy and we feel that the current bag limit will protect the grayling population. After the severe reduction of the grayling population in the past, the limit was reduced to a daily limit of five fish and this limit was incorporated in the Sport Fisheries Division of ADF&G's regional fisheries plan that was adopted by the Board of Fisheries. The grayling have recovered because of these measures. This is a good plan and we support it and don't support this change.

John Morack  
Secretary  
Midnight Sun Chapter of Trout Unlimited



## **Addendum to proposal 4**

We would like to change the verbiage for the proposal to say;

**While fishing in the Montague Seclusion Zone, Any removal of King Salmon from the water must be retained.**

**Single Barbless hooks are required for catch and release.**

We wanted this addendum to address the site specific problem we are currently experiencing within this area without hurting any user group intending on practicing good ethical fishing techniques. We think this proposal is good for all PWS, however at the very least the seclusion zone needs immediate action.

With all the newly acquired attention to this fishery and king salmon closures throughout the state we have noticed a growing problem with current catch and release practices. I have personally watched fisherman play these fish near exhausting, net and pull onboard and several minutes later after pictures, thrown back into these highly predatory waters.

We are trying to promote good, ethical catch and release practices and still allow all gear types designed for retention, just stopping the promotion of needless fish waste.

We have similar laws where removal of fish from the water is prohibited. The difference in this law is it specifically targets a user group practicing unethical fishing techniques.

We believe this is a perfect law for bringing awareness and the tools for enforcement to curb a growing problem.

We have included some coordinates to aid in setting up boundaries.

If you have any questions or concerns, please contact me directly.

Respectfully

Nathan Smith

Vice President, Seward Charter Boat Association

(907) 491-1300



## Wright, Sherry (DFG)

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**Subject:** FW: Draft Minutes 11/13/2014  
**Attachments:** FGACminutes11-13-2014draft.doc

Apologies. I made a mistake in copying the numbers Nate Smith provided to the AC. Sherry saw the error and asked for clarification. Below is the corrected portion of minutes that contains the right numbers and symbols.

**Basically we endorse an exclusion zone from three miles off Hanning Bay [59° 59.00' N 147° 42.28' W] following a line generally 3 nm. off the beach around Cape Cleare to a point 3 nm. off Wooded Islands [59° 52.54' N 147° 20.24' W]. Inside this zone single barbless hooks would be required for catch and release fishing. Any King Salmon removed from the water in this area must be retained.**

I would ask that Sherry include Nathan's two most recent addenda to his Proposal 4 comments for consideration by the BOF.

Thanks and regards.

jh



Submitted by David Blake PO Box 2705, Cordova AK 99574  
For 2014 Board of Fisheries meeting December 2-8, 2014, Prince William Sound AK

Proposal 3 - 5 ACC 01.620: I oppose this proposal as it would be difficult for enforcement to monitor as the Copper River fishing district is very large and diverse. It could create an enforcement hardship to be able to see if the allowable amount of fishing gear is being used by the subsistence fisher's.

Proposal 4 - 5 ACC 55.023: I support some kind of control of any catch and release fishery in all of AK in general. Puget Sound in Washington State has for many years instituted a barbless hook only fishery for all salmon. I think this would be easier to enforce as unless an enforcement officer actually sees a release of a salmon there would be no way to control or enforce the proposal as written. I submit that a barbless hook fishery for all salmon in Prince William sound be an alternative to the proposal instead of passing something that could not really be monitored.

Proposal 5 ACC 55.023: I support this proposal as PWSAC needs to have protection for its equipment ( seine). Moving any fishery away from the barrier is a good idea for protection of both the equipment and the brood stock at any hatchery in PWS.

Proposal 6 - ACC 55.023. I support this proposal with the amendment that the artificial tackle also include language that the tackle must use barbless hooks.

Proposal's 13 & 14 5 ACC 24.370, I strongly oppose any change in the long standing PWS allocation policy of allowing seining in the Coghill district prior the now published date. The chum run at Ester Island swings north into the proposed area and this would allow the Seine fleet access to the Chum fishery designated for the gilnet fleet. These are actually allocative issues no matter that the author's attempt to hide the real intent of the proposal.

Proposal 16, 5 ACC 24.370. I agree that this could make the fishery more orderly. However I believe that this could be an issue for one or the other gear types if say the fishery was on a one day on one day off schedule one gear type could have an advantage or disadvantage. Maybe an amendment could change from even and odd days to switching the gear type by changing the ends of the district each opening.

Submitted by David Blake PO Box 2705, Cordova AK 99574  
For 2014 Board of Fisheries meeting December 2-8, 2014, Prince William Sound AK



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Proposal 17 - 5 ACC 55.03. I oppose this proposal. As a commercial gillnet fisherman of 30 plus years in Area E. The gear we use is durable and does not have the drop out issues of Monofilament web. I disagree with the argument of less cost over the long run of the time the gear is usable. I would think with Mono gear the fleet would be more efficient and that would be just less time on the grounds.

Proposal 18 5 ACC 24.331. I oppose this proposal. The commercial fishery has had king salmon as a part of their fishery for over 100 years. The commercial fleet has already given up more than it's share of time and area in the conservation. This is a not well disguised fish grab by one user group at the expense of another. Also I do not believe that this is something that enforcement would have any reasonable way of measuring or enforcing on the fishing grounds during an open fishing period which is the only time the inspection could be made as that is when the gear would be used in the fishery.

Proposal 22 5 ACC 34.368, I support this proposal as written with the Lat. Long. Of the existing points supplied to the board prior to the proposal being set into regulation.

Proposal 33 - 5 ACC 24.361: I oppose this proposal as I believe that it is up to the department to set escapement goals not a user group using the proposal system to reallocate salmon from one user group to another.

Proposal 37 - 5 ACC 01.647: I support this proposal as timely and accurate reporting from all user groups in any fishery in Alaska is best for the management of the resource. Timely and accurate reporting will assist the managers of the resource make informed decisions in the management of the resource.

Proposal 38 - 5 ACC 77.591 I oppose this proposal. Mandatory opening and closing dates for any fishery takes away inseason tools from management. The copper river has had good salmon returns for several years and it seems that the management tools in place are working well and do not need to be tweaked to favor one user over another or to reallocate resource.

Proposal 40 - 5 ACC 77. XXX New Section I support this proposal on the grounds that all other commercial users have reporting requirements. The charter industry is a commercial user of the resource and should be held to the same standard of reporting as any other commercial user.

Submitted by David Blake PO Box 2705, Cordova AK 99574  
For 2014 Board of Fisheries meeting December 2-8, 2014, Prince William Sound AK



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Proposal 41 - 5 ACC 77.591. I oppose this proposal. This regulation was originally written to insure that conservation was shared by all users of the resource when conservation is necessary. In recent years conservation has not been an issue however the future is not always going to hold the abundance that we have experienced these past few years and in times of lower runs all users need to share in the conservation of the resource.

Proposal 43 - 5 ACC 77.591 I oppose this proposal. Emergency order has and will in the future correct this lower king run. With no inseason reporting and an estimated 10,000 users there would be no way for the managers to enforce or control this kind of proposal.

Proposai 44 - 5 ACC 24.310. I strongly oppose this proposal. I implore the board to look to the escapement and harvest records form the years past and the stability of the runs for all users. The Copper River has been extremely well managed and the salmon returns reflect that well managed resource. This proposal is nothing other than a reallocation from one user to another of he early run salmon in this river system. The early catch records from the commercial fishers are part of the management and has been since the beginning of the management of this system. Another thinly disguised reallocation proposal.

Proposal 45 - 5 ACC 24.361 I support this proposal. The department managers have always had and used their emergency order powers to manage the resource well. History has proven that they do a good job without mandatory closure regulations.

Proposal 46 - 5 ACC 01.3xx new section: I oppose this proposal. The fish will be recorded on a fish ticket and counted no matter if that fish goes home for personal use of the commercial fisherman or if that fisherman sells that fish to a buyer or processor. This proposal does not follow common sense and just puts additional burden upon the enforcement officers.

Proposal 47 - 5 ACC24.361 Strongly oppose this proposal. This is not a feasible harvest method in area E commercial fishery. This would create severe safety issues. The management of the Copper River runs are doing well. This is a thinly disguised attempt at reallocating King salmon to upriver users. There is no need for mandatory management changes in a system that has sufficient escapement to the spawning grounds.



Submitted by David Blake PO Box 2705, Cordova AK 99574  
For 2014 Board of Fisheries meeting December 2-8, 2014, Prince William Sound AK

Proposal 49 5 AAC 52.023: I oppose this proposal as this is an already fully allocated fishery. I believe that it would be counter productive to open or extend to a spawning area would not be prudent for protection of the resource. Harvest of Klutina kings are available in lower river fisheries and this extension of either time or area is unwarranted.

Proposals 50 & 51 & 52 5 ACC 520.022: I support this proposal with the amendment to language of all sport fishing on the copper river and its tributaries should require the use of barbless hooks, or there should be no catch and release of any salmon in the system. I believe that the mortality of any catch and release salmon increases mortality of potential spawning escapement.



Submitted By  
Timothy J Moore  
Submitted On  
11/21/2014 1:02:12 PM  
Affiliation

Phone  
(907)3998031  
Email  
[seascape@alaska.net](mailto:seascape@alaska.net)  
Address  
PO Box 1646  
825 Tasmania W Ct.  
Homer, Alaska 99603

To all Board of Fish Members:

I am a PWS salmon seiner who has fished for 24 years. I presently serve on the PWSAC board and have been for 12 years. This testimony is my own and represents no one else or any other organization.

I oppose proposal #11. It drastically shifts allocation favorably towards the gill netters. The allocation plan that was created in 1991 to equitably allocate PWSAC fish took into account not only ex-vessel value but kept the 3 gear groups fishing in their historic areas of P.W.S. The drift gillnetters have no history of fishing in Valdez or being included in the original plan which established VFDA. This proposal would make a drastic shift that would most certainly allocate Port Chalmers to the gillnet fleet exclusively. PWSAC would also be faced with shifting some pink production and future production unfairly towards the gillnetters. Both the gillnet fleet and seine fleet are economically viable presently. The CFEC earnings report supplied in your BOF packet shows that the fleets are doing quite well. To adopt this proposal would start a tipping of the apple cart for sure.

I oppose proposal #12 for many of the same reasons as I indicate in my opposition of #11. The allocation plan is based on equitable values of PWSAC production to the gillnet and seine fleets. The cooperation of all fishermen in PWS to make our PWSAC hatcheries work smoothly is essential. This proposal undermines that mission that has worked so well and is indicated by PWSAC's success in recent years. The goals of PWSAC to produce fish equitably among all users is working and I look forward to PWSAC's future. Fishermen from all user groups have worked well in this framework and allocation squabbles within the PWSAC organization have been few in recent years. To remove Gulkana production values out of the allocation formula would upset the order which has been shown to work so smoothly for the fleets. This is a very short sided proposal with no justification what so ever. I respectfully ask the board to vote to not open the allocation plan to change.

I oppose proposals #19,#20 and#21. Making spotters legal to fly during openers would change the fishery as it is today. The efficiency of the seine fleet is remarkable as it stands. It will get more powerful in the future with more new entrants until we reach 266 boats. This number is full utilization of all seine permits in PWS. The fleet is presently contemplating a permit buy back plan to address this worry of overcapitalization and future viability of the fleet. If pilots become legal then congestion and less order will exist during fishing periods. ADF&G managers will be effected by potentially having to manage more conservatively in time and area during openers. Enforcement will be more taxed as law breakers can more easily fish in closed areas where build-ups occur. The Enforcement Department has limited resources now and spotters flying during openers are not something positive for the State Agencies, Fishermen, and maintaining healthy wild stocks of fish in Prince William Sound. Our fleet is having no problem catching the harvestable surpluses of fish available to them presently. I would respectfully ask the Board to vote no on these proposals.





Alaska Board of Fish Chairman Karl Johnstone and Board members

I oppose proposals 19,20 and 21

These proposals would reverse the current ban on spotting for salmon in PWS for the Salmon Purse Seine fishery. There is a long history in PWS and other areas that make it unlawful to assist the commercial Salmon fishery with the use of an aircraft for spotting purposes.

In Bristol Bay 5 AAC 06.379 "use of aircraft unlawful. A person may not use or employ an aircraft to locate salmon for the commercial taking of salmon or direct commercial fishing operations in the Bristol Bay Area one hour before, during and one hour after a commercial salmon fishing period. This ban is also in effect in Cook Inlet under 5 AAC 21.379 A person may not use or employ an aircraft to locate salmon for the commercial taking of salmon or to direct commercial fishing operations in the Central and Northern districts of the Cook Inlet Area one hour before, during and one hour after a commercial fishing period.

The primary reason fishermen in Cook Inlet, Bristol Bay and Prince William Sound requested the ban on spotter aircraft was the frustration of what is known as "Bird Dogging" by the pilots of these planes. When spotter planes were legal in PWS the result was pilots not really spotting for fish in the water but looking at fishing vessels to see how their catches were doing. These aircraft would fly over you while you were in some part of your set and just circle until you have your salmon dried up so they could estimate the size of your set. Then if you were catching more than the vessels the spotter plane was employed by, they would radio your location and very shortly 2 to 6 boats would come boiling around the corner and fish with you or just in front of where you are fishing. Now for the folks whom are thinking, is this a problem or unfair? I will try to explain it. Imagine for a moment you are fishing a river with a fishing pole, you wander up and down looking for a good spot to try your luck or skills, you cast into the water and after a few cast you hook a salmon, life is good. Now let's include "river spotters" folks whom are not even fishing but hired to walk up and down the river to see where folks are catching salmon, they see you with a fish on and radio several fishermen your location and advise them to come and fish where you just caught a fish. Before you can land your fish several "radio advised fishermen" have crowded in the spot you are fishing. The same would apply to hunting, imagine "game spotters" folks whom do not even have a rifle but just watching for other hunters so they can radio where you are and if you are finding game so they can send a crowd of hunters to where you are hunting. This is what we experience when "spotter planes" are legal.

There is reference in one proposal that planes can not fly parts, crew and other services due to the aircraft ban. This is simply not true, fishermen that complain to the troopers about spotter pilots flying during open periods are not concerned with a plane landing and transferring passengers or supplies. They are complaining about guys that fly up and down the coast spending hours spotting and then landing to talk without using radios to fishing vessels. There are similar laws like flying and hunting the same day. Thousands of planes fly during hunting seasons, they can land and pick up or drop off hunters any day they want. They simply can not fly over the land to spot game and then land and hunt in most areas on the same day.

Leroy L. Cabana Homer Alaska



Alaska Board of Fish Chairman Karl Johnstone and Board Members

I oppose proposals 11 and 12

Proposal 11 asks the BOF to include the salmon harvest value of Valdez Fisheries Development Association to the Prince William Sound Management and Salmon Enhancement Plan.

The current salmon allocation plan was the result of no less than 3 BOF cycles, the short version is fishermen from the set gillnet, drift gillnet and purse seine fleets created a salmon hatchery corporation known as PWSAC. It started in the hatchery called Armin Koernig in 1975 and is located on Evens Island and grew into a 5 hatchery corporation. PWS is a large area and in most areas only purse seine or drift gillnet gear is allowed and for the most part does not overlap as far as gear types. The only area where both gear types are allowed at the same time is the Coghill District. This is where the Wally Noerenberg Hatchery is located on Esther Island in Lake Bay. For a long period of time the different user groups did not have an allocation plan or could they agree on what user group would harvest PWSAC produced salmon. BOF cycle after BOF cycle hot tempers and passionate demands were made to "make the PWSAC" salmon production fair for all. As the long term history 1960 to 1980 of salmon value harvest prior to PWSAC production was almost exactly 50-50 between the purse seine fleet and the drift gillnet fleet the argument was accepted to allocate PWSAC salmon in the same manner. The set gillnet group is allocated 4% and the purse seine and drift gillnet fleets split the balance 50-50. The rationale was PWSAC was created by the 3 user groups and PWSAC should follow the long term harvest by value for each user group. There were countless decisions about including ALL PWS salmon including the Copper River production and Valdez hatchery production. Everybody had their say many times, we had years of "salmon allocation committees" formed by the BOF with Mel Morris keeping us somewhat civil and focused. The end result was to keep it as simple as possible and the decision to allocate only PWSAC produced salmon. The Copper River runs were doing well at the time as was the hatchery production at Valdez.

Any attempt to make significant changes to an allocation plan that has functioned as well as the current PWS Allocation plan should be considered only after careful and complete study. This would include BOF directed allocation committees and involvement from PWSAC requesting such action.

There is no mention in either proposal 11 or 12 what would be the result to the current Allocation plan. Currently the Gulikana Hatchery production, aprox 350,000 goes 100% to the Drift gillnet fleet, the Main Bay hatchery produces Sockeye salmon, aprox 1 million and is caught by the set net fleet and the drift gillnet fleet except a very small percentage that is caught by the purse seine fleet. The AFK hatchery on Evens Island, aprox 8 million and the Cannery Creek Hatchery, aprox 7 million, production is harvested by the purse seine fleet, they are both pink salmon hatcheries and AFK produces about 300,000 chums per year also harvested by the purse seine fleet. The Big hatchery for PWSAC is Wally Noerenberg at Esther Island. It produces chum aprox 3 million per year, primarily harvested by the drift gillnet fleet, pink aprox 8 million, which is primarily harvested by the purse seine fleet and Coho, aprox 140,000, which is harvested by the drift gillnet fleet. There is the remote release site located on Montague Island known as Port Chalmers, it usually brings back about 400,000 to 500,000 chums. This is known as the balancing tool for keeping the drift gillnet and purse seine fleets in balance for the PWS allocation plan.

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When the drift gillnet fleet is more than 45% behind the overall PWSAC harvest by value they get exclusive access to Port Chalmers for the chum harvest, same is true for the purse seine fleet. There is a balance tool to allow the seine fleet into Wally Noernberg in the event the seine fleet is less than 45% by value but this has not happened yet.

This information is important to predict what would happen to the current allocation plan if the BOF adopted either the removal of the harvest value of the Gulkana PWSAC produced sockeye as in proposal 12 or if the BOF decided to include the value of the Valdez pink production as requested in proposal 11 into the PWSAC allocation plan. Either of these changes would require the BOF to EXCLUDE the purse seine fleet from ALL PWSAC produced salmon from the Wally Noernberg hatchery to maintain the current harvest value or the BOF would be adopting a proposal which would create an imbalance which would get worse each year.

It is important to always keep in mind why we have an allocation plan, it is to allocate resources multiple user groups have access to and desire to harvest, the purse seiners have no access to Copper River production and the drift gillnet fleet have no access to Valdez pinks.

PWSAC is what we have in common, Purse seiners, Set gillnet and drift gillnet started PWSAC, it is what we share, it is what we should allocate among ourselves. It has been allocated fairly and should stay that way.

Leroy L Cabana      Homer   Alaska

**Page 2**

To Fish & Game Board of Fisheries  
907-465-6094



PC 31  
1 of 1

Mike Mickelson Box 1504 Cordova, AK 99574

Proposal 1 Oppose without mandatory 24 hour reporting

Proposals 2-8 Support

Proposal 11-12 Oppose - Allocation is working lets keep it.

Proposal 13-14 Oppose - Department already exercises E.O. Authority when surplus of reds exist in the Coghill system.

Proposal 15, 16 Oppose - These proposals are unnecessary, user groups can figure it out.

Proposal 17 Oppose - This proposal would create an undue burden of cost. I have 11 drift gillnets which would no longer be competitive. These nets could not be rehung in time for the 2015 season with monofilament, and I do not have the budget. I would be more open to this proposal if it would apply in 3 years following the meeting.

Proposal 18 Oppose-ADF&G has the management authority. Proposals 22, 24,28 Support

Proposal 29 Oppose

Proposal 32 Support

Proposal 33 Oppose

Proposals 34-36 Support

Proposal 37 Support - Rapid reporting of all user groups allows managers to actively protect the resource in times of scarcity and allow for more harvest in times of abundance.

Proposal 38 Oppose - Proposal authors insinuate they need PU fish to feed their families. The Personal Use fishery is not a subsistence fishery. The June 7th date for the PU opening allows subsistence users make sure they get their fish in a timely manner at the beginning of the season.

Proposal 39 Oppose - The Personal Use fishery is not a subsistence fishery and should not be managed as one.

Proposal 40 Support - More information is always helpful

Proposal 41 Oppose - If commercial fishing is closed for a long period of time managers are worried about escapement.

Proposal 43 Oppose - This proposal severely limits managers ability to protect the resource in times of shortage

Proposal 44 Oppose

Proposal 45 Support - ADF&G has been actively keeping inside waters closed to commercial fishing to protect king runs. During years of abundance managers should not be hampered in there ability to manage the resource.

Proposal 46 Oppose - This proposal has no conservation benefit, the kings will be caught either way.

Proposal 47 Oppose - This proposal means to use fishing methods that have been successful in the Yukon in river fishery, that are completely inappropriate. The Copper River Drift Gillnet fishery is not an in river fishery..

Proposals 49-53 Support

11/15/2014



Alaska Dept of Fish and Game  
Board Support Section

**Subject: BOF Proposals 2014/2015 PWS & Upper Copper River/Upper Susitna River Finfish Meeting**

To: Board of Fisheries

**Proposals 1-3 Support**

I support these proposals that increase opportunity and reduce costs to participate in this subsistence fishery.

**Proposal 5 Support**

It's important to maintain good brood stock health.

**Proposal 6 Support**

Catch and release with bait should be limited.

**Proposal 17 Support**

As the author of this proposal at this point I would ask that the Board of Fish defer any action on proposal 17 until your meeting at Southeast and Yakutat Finfish meeting in Sitka on February 23<sup>rd</sup>. This same proposal number 210 is on the agenda for Southeast drift fisheries. That will give the board; ADF&G and the public in both areas of the state to comment on the use of this gear and the Board of Fish can make a more informed decision.

**Proposals 19, 20 and 21 Oppose**

These proposals would affect drift gillnet fisheries.

**Proposal 22 Support**

All boundary lines should be Lat/ Long

①



**Proposal 34 Support**

Give the department the tools to achieve escapement goals.

**Proposal 35 and 36 Support**

All the dip nets that I have observed use a 6 strand gillnet web not mono. If the goal is to release Kings unharmed then a heavier web will be required.

**Proposal 37 Support**

Protect the resource.

**Proposal 39 Oppose**

Fully allocated resource.

**Proposal 40 Support**

More harvest information will help the dept.

**Proposal 43 and 44 Oppose**

Proposal 43 asks for more Kings for personal use fishery while proposal 44 claims that the kings are not making escapement goals?

**Proposal 45 Support**

Let the department manage the fishery based on current data. Even though the drift fleet did not fish inside the barrier islands until the middle of June in 2014.

**Proposal 46 and 47 Oppose**

These proposal's make no sense to someone that actually participates in the fishery.

I have been involved with Copper River and Prince William Sound Fisheries for over 45 years. Thank you for considering my comments.

Michael Bowen  
2150 Innes Cr  
Anchorage, AK 99515

2



11/15/2014

Alaska Dept of Fish and Game  
Board Support Section

**Subject: BOF Enhanced Salmon Proposals 2014/2015 PWS & Upper Copper River/Upper Susitna River Finfish Meeting**

To: Board of Fisheries

**Proposal 10 Support**

The regulation clearly states 4% and needs to be consistent.

**Proposal 11 or 12 Support**

As the author of these proposals I am at a lost to where even to begin. I was involved with and served on the Allocation Working Group formed in 2003 by the Board of Fish to work on a new enhanced salmon allocation plan with the goal that it be fair to all user groups and maintained historic allocation values prior to the development of enhanced salmon in the PWS area. After several meetings of the Allocation Working Group it was determined that the plan should be based on enhanced salmon only. Whenever the seine fleet representatives broached the idea of taking VFDA out of the enhanced salmon only plan, Mel Morris was very adamant that if VFDA was out then another hatchery would need to be out for the drift and set net users. The Allocation Working Group held six meetings to gather all the history and information needed to come up with a fair and workable plan. At the last Allocation Working Group meeting two weeks before the 2005 Board of Fish meeting Mel Morris produced his "Strawman Proposal" (see attached document). As you can see Mel Morris had developed a very detailed plan that included all enhanced salmon, all that need to be done at the 2005 Board of Fish meeting was set the trigger percentages.

At the 2005 Board of Fish meeting the seine fleet kept pushing for the removal of VFDA and the drift fleet assume VFDA was in especially after Mel Morris's adamant verbal comments during all of the Allocation Working Group meetings and his Strawman Proposal developed at the completion of the Allocation Working Group meetings. Why Mel Morris changed the plan and removed VFDA out of the Allocation Working Group strawman's proposal at the last minute before deliberations is a mystery to me. Mel Morris could give no real answer to justify the removal of VFDA from the plan other than "No one should be surprised as everything was discussed in committee" and "No one could agree to what was fair".

3



Proposal 11 asked the questions that need to be answered. Mainly how can there be a fair enhanced salmon allocation plan that does not include all of the enhanced salmon produced in Area E? All enhanced salmon facilities in Area E utilize public funds for start up and future expansion. VFDA is one of the largest pink salmon producing hatcheries in the state and its production represents 20% or more of the annual total enhanced salmon value in Area E. The seine fleet gets over 50% of PWSAC fish and all of VFDA fish that comes to 70% or more of the value of enhanced fish produced in Area E. This is a huge windfall for one commercial user group.

On the matter of fairness, I would assume that the seine fleet considers the current plan fair. As a member of the drift fleet excluded from any benefits of salmon produced by VFDA I consider the plan unfair. In the end it will be up to this board to determine if it is fair to leave out the largest producing enhanced pink salmon hatchery from the plan. If the Board of Fish cannot find that all enhanced salmon should be in the enhanced salmon allocation plan then I offer some ideas for a compromise.

You would think that when the Board of Fish is faced with a situation like this it would look for a compromise or middle ground or share the pain. With that in mind, I proposed proposal 12. Gulkana is the smallest producing hatchery in Area E and produces around 200,000 sockeyes and would be a more that fair compromise to make the plan fairer. Another middle ground option would to include 50% of VFDA value into the plan. That way all commercial user groups would share the pain and think the plan is not fair.

#### **Proposal 13, 14, 15 and 16 Oppose**

I find it ironic that the Northwest & Alaska Seiners' Association has a conflict with drift gillnets in Esther but would gladly fish alongside them in Coghill. The proposal to allow seines in Coghill prior to July 21<sup>st</sup> has been proposed every board cycle since 1993 and has been denied every time.

I have been involved with Copper River and Prince William Sound Fisheries for over 45 years and have been active in the debate concerning enhanced salmon allocation since the first enhanced salmon fry hit the water. Thank you for considering my comments.

Michael Bowen  
2150 Innes Cr  
Anchorage, AK 99515



PROPOSED ALTERATION OF 5AAC 24.370. Prince William Sound management and salmon enhancement allocation plan

The purpose of the management and allocation plan is to provide a fair and reasonable allocation among the gear groups and to reduce conflicts among these users. With these objectives in mind, it is my intent to 1) make the allocation plan achievable, 2) decrease the occurrence of allocation shortfalls, 3) make the fisheries more predictable and regular over the long-term, and 4) encourage improvement of product value. These goals are not meant to supersede the underlying purpose of maintaining long-term historic balance between the user groups. However, it must be recognized that significant changes have occurred in salmon markets and fisheries since the inception of the allocation plan in 1990-91 rendering the plan as currently written, basically, ineffective. The enhanced stock only plan is a strawman proposal that I have prepared. I'll look for your comments at the Committee meeting on Dec 1.

1) Enhanced allocation plus trigger points. Using the 2000 – 2004 enhanced only catch by species and gear type applied to 2004 prices, the allocation percentages are approximately: PS--54%, DGN--42% and SGN--4%. Trigger points would be set at XX% and XX% for PS and DGN with a piggy bank plan similar to the existing plan.

- 2) If PS 5-year rolling average drops below XX%:
- a) PS will share Esther as per the current plan.
  - b) Port Chalmers as per plan.

5



- 3) If DGN drops below XX%
  - a) DGN will share Port Chalmers as per the current plan.
  - b) Esther per current plan.
  
- 4) Redraw the Esther Subdistrict or add a buffer subdistrict to minimize interception of hatchery chums by DGN for cost recovery concerns or allocation disparity corrections.  
Management Options:
  - a) Preferred: establish separate subdistrict managed in consultation with PWSAC.
  - b) ADFG closes subdistrict for GN whenever PS fishing.
  - c) ADFG closes subdistrict for GN for entire season whenever PS is to have access.

As I mentioned, the Allocation Committee will revisit this proposal at our meeting on 12/1. You will note that I have left the trigger points blank and will look for input at our meeting to establish those if the Committee can agree.



November 12, 2014

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

To the Board of Fisheries:

Attached are comments on the Upper Copper River/Upper Susitna River/PWS fisheries proposals.

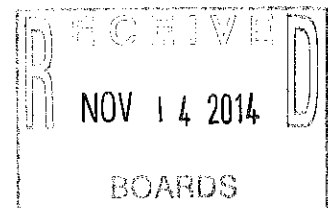
Please review them and consider them during deliberations.

Sincerely,

*Storia Stic Ewan  
for Roy S. Ewan*

Roy S. Ewan,  
Chair of  
Ahtna Tene Nene' C&T Committee

P.O. Box 649 – Glennallen, Alaska 99588  
Phone: (907) 822-3476 – Fax: (907) 822-3495





## **Prince William Sound (PWS)**

We support Proposal 2 with 24 hour reporting of subsistence fisheries harvest. We believe that subsistence opportunities should have a priority over commercial fisheries.

### **PWS & Copper River - Sport Proposals**

We oppose Proposal 49 to change the sport fishing season opening date for King Salmon on the Klutina River from July 1 to June 1 through August 10. Chinook Salmon have been on the decline for the past 5 years. Early and late runs of King Salmon should reach spawning grounds to spawn.

King Salmon in the Sports Fisheries (on June 14, 2014) was limited from a 4 to 1 King Salmon annual bag limit by emergency order. Any King Salmon harvested prior to June 14<sup>th</sup> were counted towards the 1 fish annual limit. The trend in the last 5 years has shown a decline in King Salmon and ADF&G because of this decline has taken action to protect the population of King Salmon in the Upper Copper drainage by reducing the annual bag limit.

Regulations for restriction/closure of King Salmon in the Klutina River should be kept in place to protect King Salmon from further decline and dwindling populations. The Board should do whatever it can do to protect further decline of King Salmon.

We support Proposal 50 to prohibit use of barbed hooks, multiple hooks and bait when fishing for king salmon in the Upper Copper/Upper Susitna Areas.

The catch and release of fish goes against our beliefs. Playing with our traditional foods is Engii. It is bad luck, fish will not return to us. It shows a lack of respect to the fish.

The fish studies done on Kenai River support our stance on the mortality rate of fish caught and released.

No comments on Proposal 51. See our comments on Proposal 50.

No comments on Proposal 52. See our comments on Proposal 50.

No comments on Proposal 53. This is a house keeping proposal.

We support Proposal 54 to increase Arctic grayling to 10 per day and 10 in possession and only 5 of which may be 14 inches or longer.

It is expensive to travel to streams and creeks to fish for Arctic grayling with an allowable catch of 5 per day and 5 in possession. Cost of fuel is expensive in the Copper Basin. Cost of living in the Copper Basin is high as well. Fishing for grayling should be a productive experience and an enjoyable one. Five Arctic Grayling isn't enough grayling to catch in one outdoor fishing excursion.

We support Proposal 55 to correct an unintended omission by adding Bridge Creek to the regulations to keep rainbow/steelhead trout at 10 fish, of which only one may be greater than 18 inches in length to keep this finfish at a stable population. Bridge Creek was not included in the regulations and should be



## Subsistence/Personal Use Salmon

We oppose Proposal 34 to restrict King Salmon subsistence fisheries and modify method and means for fish wheels. Should be the last resort and **only after** all the other commercial, personal use and sport fishing have been closed.

There are concerns about cost, safety and the ability to safely remove a live king salmon from the wheel. In the past the board of fish has reviewed the use of live boxes and has consistently opposed them.

Federal fisheries data for Chinook harvest for the years from 2002 to 2013 shows that Glennallen Subdistrict Fisheries harvested (37,932) or only 11% of the total King Salmon harvested by all fisheries. Compare this federal data figure to King Salmon harvested by the Commercial fisheries (308,963), Copper River District Subsistence fisheries (5,956), Sport Fisheries (36,483), and Chitina Subdistrict Fisheries (19,321). Subsistence fisheries should not have restrictions for King Salmon, nor should fish wheels have to be modified. Federal fisheries harvested on 11% of total King Salmon harvested by all fisheries.

We support proposal 35 with modification to prohibit the use of monofilament mesh dip nets and landing nets that are deeper than 2.5 ft. depth with a 5 ft. (mouth) across the opening for subsistence and personal use fisheries. Fish are entangled in monofilament mesh or sport fishing land nets, if the depth of the net is deeper than ½ with a width of 5 foot open of the net. After lying on the banks of the Copper River for hours, King Salmon are then extracted from these nets, and harm, damage and death occurs to King Salmon. Chinook that are caught in monofilament dip nets and landing nets that are deeper than ½ feet, with a width of 5 feet opening are entangled, and are dead by the time they are taken out of these nets.

Monitoring of personal use fisheries is needed to check on the depth of landing nets and monofilament dip nets to prevent harm, damage and death to King Salmon. It is difficult to take King Salmon out of nets, that are longer than 1.2 ft. depth with a 5 ft. (mouth) opening, so fishermen leave them on the beach, until they can easily take them out of nets, when they are near death or dead.

Only 1 King Salmon is allowed per year, if there isn't an EO for Personal Use Fisheries. If more than one King Salmon are allowed to be harvested per year, there will be an inexcusable harm or death to King Salmon.

Anything the Board can do to promote more King Salmon migrating up the Copper River to spawning grounds will help in to increase the King Salmon back to sustainable biological escapement goals.

We support Proposal 36 to prohibit King salmon that is to be released may not be removed from the water prior to release. King salmon are difficult to handle. Leaving them on banks of the water will bring harm or death to them. If King salmon are to be released, it should not be removed from the water. Using dip nets to catch Kings can be easily managed to release them while they are still in the nets back into the water. Doing so will keep King salmon healthy, vibrant, and alive, so that it can migrate back to its spawning water areas.

The Board must do anything in its power to increase King salmon population, keep it at a sustainable level, keep King salmon safe from harm, damage and death. In the past 5 years, the population of Kings



The Board should reduce maximum harvest levels for Personal Use Fisheries, not increase allocation. As participation in Personal Use Fisheries increases, allocation will have to be adjusted to satisfy harvest levels. In 2013, there were 10,600 Personal Use permittees who fished for salmon in the Chitina Subdistrict. More salmon is harvested by Personal Use Fisheries, which affects Upper Copper River federally qualified subsistence use fisheries and subsistence fisheries under State management.

We oppose Proposal 43 to include an allocation of 3,000 King Salmon harvest level for Personal Use Fisheries. It removes the States, ability to manage the resource for sustainability. The State fisheries biologist has used emergency orders to protect the King Salmon stock.

The Board should take no action on this proposal.

### **Statewide Proposals**

We support Proposal 261 to modify prohibitions on importation and relative of amphibians in Alaska to protect wildlife, fish, lands and waters in Alaska from genetic alteration of species in Alaska, causing harm, disease or threat to health of indigenous species, and other reasons that are listed in this proposal.

We support Proposal 262 as written for the reasons listed in the proposal. Regulations should be in place to address collection, transport, and possession of amphibians in Alaska. Native amphibian species in Alaska could be harmed health wise by these non-invasive species.

### **Supplemental Issues**

We support Proposal 265 to add regulations to ban the use of live earthworms as bait in fresh water sport fishing. Using earthworms as bait may cause harm to indigenous fish in Alaska. It is not natural food source, is harmful to plants and wildlife too.

We oppose Proposal 267 to repeal the use of footgear with absorbent felt or other fiber material on the soles while sport fishing in fresh water. Non Indigenous species will invade native species of plants and cause disease to wild game in Alaska and cause harm to them.



Submitted By  
Pat Turner  
Submitted On  
11/6/2014 4:04:29 PM  
Affiliation

Phone  
907 388-9429

Email  
[psturner@ak.net](mailto:psturner@ak.net)

Address  
141 Nilgrub Ave  
Fairbanks, Alaska 99712

This comment is in regards to the proposed changes to the Chitina Personal Use Dip net Fishery (CPUDF) regulations. I have been a dipnetter at Chitina for over twenty-five years and am saddened by the continued assault I see on an individual's right to resources. I am in full SUPPORT of the following proposals: Proposal 38 --- return the CPUDF earliest opening date to June 1. If the goal is to get more fish upstream early in the season, attacking the personal use fisherman is not the way to affectively do this. Proposal 39 --- increase the CPUDF annual bag limit to match the south central dip net fishery bag limit and do away with supplemental periods. Without this change, large Alaskan families, especially in Fairbanks are penalized. The Upper Cook Inlet Personal Use Salmon Fishery has an annual bag limit of 25 salmon for a permit holder and 10 salmon for each additional household member. This is a far more equitable bag limit. I would like the Chitina Personal Use Dip Net Fishery to have the same annual bag limit as this fishery. It's time to treat all Alaskan fairly. Proposal 41 - -- repeal language reducing the CPUDF salmon allocation to 50,000 if commercial fishermen cannot fish for more than 13 consecutive days Proposal 43 --- allocate 3,000 king salmon to the CPUDF. I am asking this so dipnetters can harvest their 1 king unrestricted during the period when kings are passing through the dip net fishery. Proposal 18 --- stop the practice of "rolling up" king salmon by drift gill-netters I am adamantly OPPOSED to the following proposals: Proposal 35 --- prohibit gillnet mesh in dip nets. This is a direct attack on the individual Alaskans' right to catch fish. Proposal 36 --- not removing dip net caught kings from the water after 1 king bag limit is met. This one is a joke! Are dipnetters expected to climb into the Copper River to release the fish? This is obviously a proposal submitted by a person or group that doesn't have a clue! Beware! Proposal 42 --- reduce CPUDF salmon allocation to 100,000. Why is it the responsibility of the personal use fisherman to keep the fishery heathy? There is no over-harvesting when individual Alaskan families are being fed by this fishery. The reasoning for this proposal is ludicrous. Proposal 45 --- repeal inside barrier island commercial closures (closures are to allow more kings to escape up river). This is an interesting proposal when given the fact that proposal 42 wants to restrict an individual's right to salmon. I hope the board will take my comments seriously when making their decisions regarding the proposals stated above. Thank you for your time. Pat Turner Fairbanks



Submitted By  
Paul Delys  
Submitted On  
11/21/2014 4:08:20 PM  
Affiliation

Phone  
347-6310  
Email  
[paul@cgfr.com](mailto:paul@cgfr.com)  
Address  
717 Chena Ridge Rd  
Fairbanks, Alaska 99709

Thanks for the opportunity to comment on proposals before the board. I've been a dipnetter going back to the early '90s. I was a commercial fisherman in the '70s and early '80s so have some perspective from both sides of the allocation fence.

#### SUPPORT

=====

Proposal 18 – We used to have some overhung nets in Uyak Bay that we'd use when there were big fish around – fish such as reds and kings that would bounce off our primary nets, the ones designed for pinks. We probably lost as many fish as we caught because almost all were loosely tangled (and dead). We did pull in significantly more big fish with the overhung nets so the boss wanted to use them. In real numbers it seems a terrible number of fish were wasted because of how overhung nets work. I can only imagine overhung nets work in much the same way in this century that they did 35 years ago. I support this proposal.

Proposal 33 --- I don't object to restrictions on king catch as a means of establishing and maintaining a strong king run in the Copper River and its tributaries. The pain of those restrictions MUST be shared by all users, not placed on the backs of any one group of fishers. I support this proposal.

Proposal 38 --- First, I consider dipnetting downstream of the bridge to be subsistence, not personal use, but I'll call it personal use to be consistent with your classification: Personal use fishing on the Copper River has minimal catch in the first two weeks of June, particularly in comparison to the commercial catch. Given that ratio, I have a hard time seeing how delaying the dipnet fishery opening date has much actual effect on escapement numbers going to the far up-river spawning grounds. I support resetting the CPUDF back to between June 1 and June 7.

Proposal 39 --- Changing the CPUDF bag limits makes good sense. Large families should have the opportunity to harvest proportionally more than small families. As a single person with no kids, I won't see much personal benefit from this change. The supplemental periods are only worth going down for if one hasn't already filled his or her card. Nobody lives in Alaska for the great shopping opportunities at Safeway – we live here to live life a bit closer to the ground, to escape Walmart and other corporate influences. Altering the bag limit as proposed promotes opportunity to be Alaskan instead of becoming reliant on the "consumer" mentality where problems are fixed by simply buying some low grade, inexpensive product of unknown origin.

Proposal 41 --- Reducing the dipnet allocation to 50k in the event the commercial fishery sees a 13 or more day closure is crazy. If the commercial people see a closure because of low returns, so should dipnetters. If the runs materialize late, all should have an equal opportunity to harvest.

Proposal 43 --- I support allocating 3,000 king salmon to the CPUDF

#### OPPOSE

=====



Proposal 35 --- I've not seen or experienced people having more problems removing fish safely from monofilament netting or barred netting. This seems like a non-starter to me.



Proposal 36 --- Making it illegal to remove a king salmon from the water if intending to release it from a dip net is a serious safety issue in many dipnet locations. I think I understand the problem the proposer is trying to solve (king salmon mortality), but implementing this proposal could well lead to loss of human life. I'm not sure this is an actual problem in real life, but if it is, a public information campaign explaining how and why to release kings properly would be received with enthusiasm. Dipnetters do not have any desire to unnecessarily waste natural resources, particularly kings.

Proposal 37 --- First, it's not the position of ADF&G to assume enforcement duties. ADF&G likely has no more budget for a 24 hour checkpoint than the brown shirts do. If there's a substantiated argument that people are operating outside their legal limits, to solution to the problem is to properly fund the folks charged with enforcement. Placing an enforcement burden on those charged with resource management is not the answer. If ADF&G believes a 24 hour checkpoint would be a valuable management tool for the fishery, they should ask for such. I expect they can get all the management information they need more cheaply and easily through a variety of other methods such as asking a sample of fishermen how they did and estimating number of fishermen via traffic counters or other techniques.

Proposal 40 --- Each fisherman already logs and turns in catch data to Fish and Game. There's no need to place this burden on charter operators. The two charter operators are, to my knowledge, do not fish from their boats. They are strictly a drop-off service. All their clients fish from shore. There are no fish caught by "trawling a dipnet" by the charter operators. If one is worried about fishers displaced because they won't take a charter vs travel the dangerous canyon road, let's study fixing the road.

Proposal 42 --- Justification for this proposal is given as the strain put on the fish stocks by the personal use fishery. The CPUDF take is a fraction of the commercial take and is spread across a far larger population. Slight reductions in the commercial openings would logically have a larger impact on in-river counts while impacting a smaller proportion of the fishery users.



Submitted By  
Paul Owecke  
Submitted On  
11/5/2014 11:16:22 AM  
Affiliation

Phone  
6085346741  
Email  
[pame4@centurytel.net](mailto:pame4@centurytel.net)  
Address  
W25376 Sullivan  
Trempealeau, Wisconsin 54661

Mr. President and Board Members,

I oppose Proposal 10 to change the set gillnet component of Prince William Sound (PWS) Management and Salmon Enhancement Allocation Plan.

I have been a PWS set gillnet permit holder and participant for 31 years. I am a founding member of Prince William Sound Setnet Association and served as President at founding, and have served many years since as President. As President I represented the setnet gear group at the 2005-2006 BOF meeting in Valdez where the current PWS Management and Salmon Enhancement Allocation Plan was formulated and approved.

The author of Proposal 10 presumes that an error has been made in setting the setnet allocation at 4% and a remedial trigger at 5%. In his response to the question stated for all proposals, "What is the issue you would like the board to address and why?".....He states, "Correct an error in the regulation." As an attendee at the 2005-2006 BOF meetings I can assure you that an error was not made, and there is no current evidence that any portion of the allocation plan is in need of revision. His presumption of error is invalid.

(For the following comment please refer to: Alaska Board of Fisheries Findings on Prince William Sound Management and Salmon Enhancement Allocation Plan #2006-248-FB. Available online at ADFG BOF webpage under Findings/Policies section.) All members of the BOF Committee B and public panel, which included myself, that met on the evening of Dec. 2 2005 (See Pg 3 of #2006-248-FB) to discuss respective gear group allocations and remedial triggers were of one mind that each gear group would have the ability to attain its full respective allocation percentage without triggering remedial action. It was also agreed that the setnet gear group would trigger remedial action by exceeding its 4% allocation percentage by one full percentage point. This was deliberate and agreed to by all parties present.

There were no discussions of attempting to trigger a remedial action by fractions of less than one percentage point. e.g. There would not be a remedial action triggered by the setnet gear group attaining say 4.25%. This was judged at the time to be a fair and reasonable action, and nothing has occurred in the interim to suggest otherwise.

The allocation plan as drafted continues to serve its intended purpose. In the nine years since the allocation plan was negotiated and adopted the setnet gear group has exceeded its allocation only once, and with implementation of the allocation plan remedial action the gear group was within its specified allocation percentage the following year.

The author is clearly unaware of the extensive and detailed process that resulted in the current allocation plan, including allocation percentages and remedial triggers. There is also no demonstrable error that was committed in assigning any gear groups respective allocation percentages or remedial triggers to assure compliance. No error was committed, or currently needs to be addressed in the setnet allocation component. The allocation plan has functioned according to original intent with all parties realizing fair and reasonable outcomes.

Respectfully yours, Paul Owecke



Comments to:

2014/2015 Proposed Changes Prince William Sound & Upper Copper/Upper Susitna Finfish

Submitted by: Brian West  
1000 Oceanview Drive  
Anchorage, Alaska 99515

Proposal 1. Oppose. The proposal is unclear but appears to allow for a 36 hour subsistence opener each week during the summer. This proposal would basically allow for commercial fishing under the guise of subsistence.

Proposal 4. Oppose. This is unenforceable. How would kings under 20 inches be handled? Most of the pressure on PWS kings comes from charter operators, mostly from Seward, if they are concerned with this fishery why don't they as an association hold themselves to what they have proposed?

Proposal 18. Support. This is a common sense proposal to eliminate what has become a very effective means of catching kings as by-catch. When necessary, gear restrictions are used to reduce the number of kings caught, however, the technique of "rolling up" enables a fisherman to get around the regulations.

**RECEIVED**

**NOV 05 2014**

**BOARDS  
ANCHORAGE**



To Whom It May Concern:

RE: Proposal 4-5AAC 55.023 "Special Provisions for King Salmon in Prince William Sound"

I am a local Cordova winter king fisherman, and I object to this proposal. By the way it is written, it applies to the whole sound which does not make sense. If this is a Western Prince William Sound problem, have the proposal directed to that specific area and make the necessary rule changes there.

Locally in total we catch very few winter kings. For example, we probably catch less in a year than the amount caught during the Homer Derby each year. I do not know of anyone targeting spring king salmon in this area.

Please limit the proposal to the West side of Prince William Sound.

Thank you,

A handwritten signature in blue ink that reads "Ronald Goodrich".

Ronald Goodrich



Submitted By  
Richard Bishop  
Submitted On  
11/21/2014 12:00:31 PM  
Affiliation  
self  
  
Phone  
907-455-6151  
Email  
[rbishop@ptialaska.net](mailto:rbishop@ptialaska.net)  
Address  
1555 Gus's Grind  
Fairbanks, Alaska 99709

The Chitina Subdistrict Personal Use dipnet fishery is an essential food gathering opportunity for thousands of Alaskans. It's particularly important to Interior residents who have travelled to fish there for many decades. The record of their participation in this food gathering is extensive and well documented. At various times the fishery has been designated a "subsistence fishery" which, in essence, is what it is.

The first time I dipnetted at Chitina was about 1966. I have occasionally dipnetted there in subsequent years. In recent years I have given my proxy to one or another of our sons. So I still benefit from the opportunity to have salmon from that fishery for our annual food supply. We have traditionally relied principally on fish and game for well over 85% of our animal protein. The Chitina Dipnet fishery has become even more important to me in the last couple years because of restrictions on king salmon personal use fishery in the Fairbanks area -- which I have engaged in annually for over 40 years.

The regulation proposals before the Board of Fisheries from the Chitina Dipnetters Association well represent the interests and perspectives of many, if not most, people who have traditionally relied on this fishery for a significant part of their annual sustenance. The dipnet fishery has chronically been restricted unnecessarily, while the overwhelming bulk of the catch of king and red salmon have been taken prior to, or during, the dipnet fishery by coastal commercial fisheries, which also benefit from extensive use of those resources for personal consumption.

The Chitina dipnet fishery deserves more equitable allocation and opportunity. Therefore I support the proposals submitted by the Chitina Dipnetters Association at this Board meeting.



Submitted By  
Richard Reem  
Submitted On  
11/11/2014 4:38:23 PM  
Affiliation

Phone  
907 452 3240

Email  
[reem@mosqitonet.com](mailto:reem@mosqitonet.com)

Address  
231 Iditarod Avenue  
Fairbanks, Alaska 99701

I am writing to support Proposals numbered 38, 39, 41, 43, and 18. I recognize that each fish is valuable, but the fish are especially valuable to my family. We have depended on the Copper River salmon for over 40 years and hope to be able to use this unique resource in the future. I oppose Proposals numbered 42 and 45. It is clear that every effort should be made to preserve an healthy king salmon return.



Submitted By  
Robert Krueger  
Submitted On  
11/20/2014 7:19:48 AM  
Affiliation  
Alaska Whitefish Trawlers Association

Phone  
509-860-4132  
Email  
[robert.krueger@alaskawhitefishtrawlers.org](mailto:robert.krueger@alaskawhitefishtrawlers.org)  
Address  
PO Box 991  
Kodiak, Alaska 99615

**Alaska Whitefish Trawlers Association**

PO Box 991  
Kodiak, AK 99615  
[alaskawhitefishtrawlers.org](http://alaskawhitefishtrawlers.org)

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Nov 19, 2014

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

Re: Prince William Sound and upper Copper/Susitna Rivers Finfish meeting  
**Proposal 26**

Dear Chairman Johnstone:

The Alaska Whitefish Trawlers Association (AWTA) is located in Kodiak and represents the majority of independently owned trawl vessels that fish in the Central Gulf of Alaska. **We do not support Proposal 26 – reducing the trip limit for the Prince William Sound pollock fishery from 300,000# to 200,000# - and ask that you reject it.**

Our vessels have been actively participating in the Prince William Sound (PWS) Pollock fishery since it began in 1995. This long-term involvement in the PWS Pollock fishery demonstrates our commitment to this fishery and our dependency on it. The Pollock harvested in PWS and delivered to Kodiak provides revenues for our harvesting vessels, product for our processors, work for processor workers and fish tax revenues for the city and borough of Kodiak and the citizens who live here.

We are very concerned by this Proposal 26 which would reduce the trip limit for the PWS Pollock fishery from the current 300,000 pounds to 200,000 pounds. The cost of fuel for a Kodiak based vessel to make a trip to PWS will remain the same whether the delivery consists of 300,000 pounds or 200,000 pounds. The reduction in the ex-vessel revenues will make it difficult for Kodiak based vessels to continue to participate in the PWS Pollock fishery. Our vessels, our processors and our city and borough will all lose the benefits from the harvest of these fish that we have historically caught. We are concerned that there is not sufficient processing capacity outside of Kodiak to handle the significant volume of PWS pollock available for harvest and a portion of this valuable resource will remain unharvested.

The Alaska Department of Fish and Game has successfully managed this fishery for many years and continues to have the ability to do so without the proposed reduction in trip limits. There already exists a check-in and check-out system and morning and evening reports from harvesting vessels can be used to determine the level of participation and harvest of both pollock and bycatch species. If there is concern regarding the amount of harvest of Pollock or bycatch at any point in time ADFG can close the fishery long enough to gather data about the harvest levels and then reopen the fishery if warranted.

**In conclusion AWTA asks that you reject proposal 26.**

Thank you for the opportunity to comment on this important fishery.

Sincerely,

Robert L. Krueger, Executive Director  
Alaska Whitefish Trawlers Association  
[robert.krueger@alaskawhitefishtrawlers.org](mailto:robert.krueger@alaskawhitefishtrawlers.org)



Submitted By  
Rod Arno  
Submitted On  
11/21/2014 2:13:29 PM  
Affiliation  
Alaska Outdoor Council  
  
Phone  
907 841-6849  
Email  
[rodarno@gmail.com](mailto:rodarno@gmail.com)  
Address  
PO Box 871410  
Wasilla, Alaska 99687

BOF Prince William Sound Finfish  
December 3 - 8, 2014

Thank you for allowing the Alaska Outdoor Council (AOC) the opportunity to provide written comments on proposals currently before the Board of Fisheries. AOC has testified before the Board of Fisheries on the topic of allocation of a publicly own resource, salmon, in the Copper River drainage numerous times for over a decade. Also AOC has litigated against the board and the state over some of the board's decisions on determining who are subsistence users among Alaskan residents. Proposals 42 and 43 are both examples of this unresolved conflict in the board's implementation of the state subsistence law in the Copper River Basin.

AOC offers the following comments on proposals;

Proposal 42. Do not adopt.

The state subsistence law, AS 16.05.258 has clear enacted text regarding the steps the board will go through when considering regulations that affect subsistence uses. Current ANS for salmon in the Glennallen Subdistrict Subsistence Fishery are being met. If the Ahtna Tene Nene' C&T Committee want a higher ANS for salmon in the Subdistrict Subsistence Fishery the board can certainly deliberate on that consistent with AS 16.05.258(b)(2).

Reducing and capping the harvest of salmon in the Chitina Subdistrict of the Upper Copper River District would not be the maximum use of that natural resource consistent with the public interest.

The board of fisheries has chosen to treat Alaskans who don't live in the Copper River Basin as second class citizens when it comes to dipnetting salmon below the Chitina/McCarthy bridge on the Copper River. Reducing harvest amounts for Alaskan residents participating in a personal use fishery during times of record salmon runs would not be justified under current state statutes.

Proposal 43: Adopt.

Re- allocate 3,000 king salmon for harvest in the Copper River Personal Use Dip Net Salmon Management Plan.

Follow the allocation criteria in AS 16.05.251(e) to determine if the personal use fishery is justified in asking for a larger allocation of the harvestable surplus of Copper River king salmon by commercial and sport fish. AOC is confident that passed harvest data and state allocation statutes would assure a re-allocation of king salmon to the Chitina Personal Use Dip Net Fishery. This action is more critical during times of low abundance. Sustainable escapement and subsistence use have priority allocation under state law. This proposals ask for a re-allocation of the total amount of harvestable surplus of king salmon allocated among three user groups, commercial, personal use, and sport.

Thank you for your attention to AOC's concerns and your willingness to serve in the regulatory process for the best interest of one of Alaska's most treasured resources, it's fisheries.





Submitted By  
Stacy Leighton  
Submitted On  
11/9/2014 8:20:15 AM  
Affiliation  
Dip netter

Phone  
907-712-7106

Email  
[stacyjl1@hotmail.com](mailto:stacyjl1@hotmail.com)

Address  
2134B Polar Wind Ct  
Eielson AFB, Alaska 99702

I support the Chitina personal use fishery and proposals 38, 39, 41, 43 and 18. I support Chitina personal use fishery's proposal to proposals 35, 36, 42 and 45.



Submitted By  
Teslin Thomas  
Submitted On  
10/19/2014 8:20:03 AM  
Affiliation  
PWS SETNET

Mr. Chairman and members of the Board, Thank you for taking the time to review my comments regarding Prince William Sound Salmon proposals. My name is Teslin Thomas and I reside in Anchorage, Alaska. I have been a setnet fisherman since 2004. My thanks to all of you for your efforts and willingness to assist in managing Alaska's fisheries.

### **Proposal 10 Oppose**

Mr. Chairman and members of the board, only 3 years ago the entire drift fleet it seemed filled the Valdez hall with one central message. "No changes to the allocation plan". Now, three years later, the smallest kid on the playground is about to have his lunch money taken.

This proposal would basically eliminate a 1% margin of error allowed in the allocation plan measured by the COAR calculation. The 1% is the setnetters buffer prior to the allocation plan enacting penalty measures on the setnet group for the following season. The plan and penalty measures are effective and have been put into place during my tenure in the fishery.

More importantly however, I would like to point out that both the Drift and Seine groups enjoy a 5% margin of error prior to action by the allocation plan. I notice any reduction in either of their margin of error percentge is absent from the proposal. Furthermore, the allocation plan as written works to increase harvest for the seine and drift fleet in the event that their COAR percentages are low. There is no corrective measure for the setnet fleet when we are below our allocation.

When this plan was enacted, good faith, whole numbers and equity for all were the foundation on which all parties could come to consensus. Why would we, for possibly less than a single percent, start to chisel away from a system that has been agreed upon and worked with for close to a decade. The Allocation Plan has shown its ability to work in the past. Please do not permit this erosion of something that is so valuable, guiding, and reliable take place.

Teslin Thomas (PWS SETNET)



Submitted By  
Susan Harvey  
Submitted On  
11/6/2014 9:59:54 AM  
Affiliation

Phone  
9078548998  
Email  
[sharvey@mtaonline.net](mailto:sharvey@mtaonline.net)

Address  
PO Box 771026  
Eagle River, Alaska 99577

Proposed Changes in Regulations for the Department of Fish and Game

Proposal 10 – Changes to Allocation Plan - OPPOSED

These comments respond to the Board of Fisheries request for comments on Proposed Changes in Regulations for the Department of Fish and Game. I am a set gillnet permit holder in Prince William Sound.

This letter provides comments on Proposal 10 to change the allocation plan. I oppose Proposal 10, and urge the Board of Fisheries to reject this proposal.

Proposal 10 recommends eliminating the 1% threshold for triggering penalty measures on the set gillnet gear group, while maintaining a 5% threshold for triggering penalty measures for both the drift gillnet gear group and seine gear group. Proposal 10 suggests an unfair regulatory proposal that would eliminate any margin of error prior to triggering penalties for the set gillnet gear group, while maintaining a substantially larger penalty trigger point buffer for the other gear groups. This proposal is inequitable by proposing to penalize the gear group with the smallest allocation to begin with. A 0% threshold for the set gillnet gear group would be unfair, while the other groups enjoy a 5% margin.

At the last Board of Fisheries Meeting in Valdez, there was resounding support from most fishermen for no changes to allocation plan. I urge the Board of Fisheries to reject this proposal, and retain the current allocation plan because it is working.

Thank you for the opportunity to comment. Susan Harvey



**Submitted By**

Stephen Adamczak

**Submitted On**

11/20/2014 8:13:14 AM

**Affiliation**

Prop. 1 **Oppose**

Change to the Copper River district subsistence season.

As regulations dealing with the Copper River District (CRD) subsistence season exist now, there is no lack of reasonable subsistence opportunity.

Prop. 18 **Support**

Halt the practice, termed rolling up kings, of hanging drift gill nets so loosely that king salmon are entangled; not gilled, this practice of rolling up kings needs to be stopped.

The resource of king salmon needs to be fairly harvested by commercial, subsistence, personal use, and sport fishers.

Prop. 33 **Support**

Establish a king salmon Optimal Escapement Goal (OEG) in the Copper River of 28,000.

An OEG of 28,000 king salmon would help king salmon stocks in the Copper River rebound from the past 6 years of low returns.

Prop. 35 **Oppose**

Prohibit the use of mono-filament webbing in dip nets.

My 34 years of dip netting experience suggest the difficulty in removing fish from these mono-filament nets occurs only with smaller sockeye when they become gilled. The larger sockeye and king salmon are not gilled and are removed easily from these nets. There is no evidence or correlations that mono-filament over other types of mesh increases released king salmon mortality.

Prop. 36 **Oppose**

Make it illegal to remove a king salmon from the water if intending to release it from a dip net.

This proposal not only would create an enforcement nightmare but shows that the author of this proposal has never dip netted in the turbulent waters of the canyon within the Chitina Personal Use Dip Net Fishery (CPUDF). This would not be possible in many instances and if attempted could result in loss of life. Where possible it should be encouraged, not enforced.

Prop. 37 **Oppose**

Create a check station at Chitina to monitor daily harvests in the CPUDF and the Glennallen sub-district.



A check station would not only be costly, but of little use in managing the fishery.

**Prop. 38 Support**

Re-set the CPUDF opening date back to “earliest June 1 and the latest June 7.

If sonar counts indicate that there are adequate numbers of salmon moving upstream for the CPUDF to open during the first week in June, then dip netters should be allowed to fish.

**Prop. 39 Support**

Increase the CPUDF bag limit to reflect household size.

The CPUDF is an Alaska resident only fishery supplying salmon for family consumption and with such large surpluses of salmon occurring in the Copper River there is good incentive to pass this proposal.

**Prop. 40 Oppose**

Require harvest logs of Chitina dip net charter operators.

Harvest data is already supplied on each personal use dip net permit. Why duplicate data and place this extra burden on the one Chitina dip net charter operator.

**Prop. 41 Support**

Repeal the regulation reducing the CPUDF allocation to 50,000 salmon if the Cordova commercial fleet is prohibited from fishing for 13 consecutive days or more.

We remind the BOF that the CPUDF is managed by abundance. Fishing times are established using preseason daily estimates coupled with actual daily sonar counts. If the Cordova commercial drift gill net fleet is not allowed to fish because of poor salmon numbers, then this will also be reflected in low sonar counts and the closing or reduction of fishing times in the CPUDF. For this reason there is no valid justification for reducing the CPUDF salmon allocation for the rest of the season because the commercial fleet is not fishing.

**Prop. 43 Support**

Allocate 3,000 king salmon to the CPUDF.

The CPUDF has the lowest king bag limit of any in-river fishery. The 3,000 king salmon allocation is fair and reasonable.

**Prop. 44 Support**

Open the commercial fishing season only after at least one salmon has been counted passing the Miles Lake sonar

The health of the fishery is dependent on upriver escarpment. If fish are not moving upriver commercial fishing must be delayed.

**Prop. 45 Oppose**



Rescind the regulation calling for mandatory commercial inside closures.

Until reasonable king salmon escapement and allowances for sport and personal use are established, mandatory commercial inside closures must remain in place. In the last 2 years the Cordova commercial drift gill net fleet has been restricted to fishing outside the closure area till the majority of the king run has moved upriver and still have harvested an average of 10,000 king each year. This has occurred while severe restrictions on sport and personal use king salmon have been imposed. The inside closure areas' shallow low tide waters affords commercial fishers easy harvest of large numbers of king salmon as they school and mill near the mouths of the Copper River before heading upstream. With the recent poor king salmon returns to the Copper, the severe restrictions on sport and CPUDF king salmon allowance, the inside closure restrictions must remain in place if we are ever to see a rebound in king numbers.

**Prop. 46 Support**

Limit the commercial king homepack to the sport fish king bag the first 1-3 weeks of the season.

In order to let Chitina dip netters harvest unhindered their 1 king salmon the CDA was left with no options other than to ask for a king salmon allocation. The CPUDF has the lowest king bag limit of any in-river fishery.