

**On-Time Public Comment List**  
**Southeast and Yakutat Crab, Shrimp and Miscellaneous**  
**Shellfish**  
**January 21–26, 2015**

---

Arthur Bloom .....	PC 01
Betty Johnson.....	PC 02
Brad Ketcheson .....	PC 03
Craig and Millie Duncan .....	PC 04
Daniel Martin .....	PC 05
David and Maggie Hall .....	PC 06
David L. Rogers.....	PC 07
Doug Larsen .....	PC 08
Frank and Bessie Highley .....	PC 09
Jacqueline Fowler.....	PC 10
James Swingle .....	PC 11
Jane Kasberg .....	PC 12
Jay Beedle .....	PC 13
John Moran .....	PC 14
Kathy Hamblett .....	PC 15
Lavair Swingle .....	PC 16
Louis and Nancy Barr .....	PC 17
Mark Johnson .....	PC 18
Marvin Isles .....	PC 19
Peter Bernstein .....	PC 20
Stephen B. Mathews.....	PC 21
Robert Morgenthaler .....	PC 22
Ron and Nan Schonenbach .....	PC 23
Scott Spickler.....	PC 24
Sharron Lobaugh.....	PC 25
Wendy Larsen .....	PC 26
Clayton Smalley.....	PC 27
Zeb Strong .....	PC 28
Larry and Janice Schultz .....	PC 29

**On-Time Public Comment List**  
**Southeast and Yakutat Crab, Shrimp and Miscellaneous**  
**Shellfish**  
**January 21–26, 2015**

---

Joshua Miethe.....	PC 30
City of Tenakee Springs.....	PC 31
Leonard Leach.....	PC 32
Lawrence Marx.....	PC 33
Spencer Swenson.....	PC 34
Kevin Castle.....	PC 35
Perry Leach.....	PC 36
Southeast Alaska Fishermen’s Alliance.....	PC 37
Skiff Lobaugh.....	PC 38
Stacy Sundborg.....	PC 39
Steve Box.....	PC 40
Wayne Mathisen.....	PC 41
Max Worhatch.....	PC 42
Blain Anderson.....	PC 43
Charles E. King.....	PC 44
Representative Cathy Muñoz.....	PC 45
Tad Fujioka.....	PC 46
Chad Poppe.....	PC 47
Linda H. Perine.....	PC 48
U.S. Fish and Wildlife Service.....	PC 49
Joan and Larry O’Keefe.....	PC 50
Gary Adkison.....	PC 51
Doug Rhodes.....	PC 52
S.A. Moberly.....	PC 53
Don Westlund.....	PC 54
Ron Opheim.....	PC 55
Kathleen Dean Moore.....	PC 56



Submitted By  
Wendy Larsen  
Submitted On  
9/28/2014 9:09:47 AM  
Affiliation  
none

Comment on proposal 77-5AAC32.150 to restrict commercial crabbers from Pt. Louisa to Lena Point. I have recently seen commercial dungeness crabbers set pot right in front of my mooring bouy and up and down the shoreline. When they do this, they wipe out all crabs in the area for about 2 years. We enjoy living on the water (and pay dearly in taxes for that privilage) and enjoy being able to set out personal use pots for carb. This area does not produce alot of crabs, but, when the commercial crabbers come in to the area, there are no crabs to be caught. Please restrict the commercial crabbers to areas not near peoples homes.

C Smalley,  
PO Box 18023  
Coffman Cove AK  
99918



PC 27  
1 of 1

12-17-14

To whom it may Concern

This is in regard to proposal 71-5AAC, 32.150

I oppose Proposal 71

There are enough crab for every one. The crab like everything in nature cycles up and down.

The Commercial fleet and residents in whale pass have got along for the last 20 or 30 years fairly well.

If there is an amendment I would say it should be a closure to nonresident sport fishermen in the summer.

Whale pass really gets pounded by them in summer.

Resident subsistence should be left alone.

I still think there are enough crab for everybody.

D hono

Clayton Smalley





PO Box 55  
Tenakee, AK 99841  
28 November 2014



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

Dear Board Members:

I wanted to share with you my thoughts on some of the proposals you will be considering as part of the 2014/2015 cycle. For the record, I have lived in southeast Alaska for 30+ years. I have owned my own boat and fished commercially in the region for 19 years both as a powertroller and a pot shrimp fisherman. I currently reside in Tenakee.

**Proposal 69:** Reliance on 2010 census data is potentially misleading. With regards to Elfin Cove/Port Althorp: while there may only be 14 year round residents of Elfin Cove, the summertime population is much higher in the area (at times over 200 people). I speak from personal experience as I fish commercially in the area June through September. Tenakee similarly sees a summertime population boom.

I fail to see the relevance of the number of residents under 18 in either area. Teenagers are indeed well-known for their voracious appetites, but it isn't clear whether the author feels these numbers strengthen or weaken his case. This information only muddies the issue. Regardless, the number of potential sport/personal use fishermen in these areas is higher than the author would have you believe. In short, it is my opinion that the official census numbers are irrelevant.

I oppose the part of the proposal that would affect Tenakee. Mr. Roddy offers no data on the actual needs of the community or of the number of crab annually utilized. I am unconvinced that the closed areas do in fact cost revenue or jobs. These areas currently function as marine reserves. Secure breeding areas might in fact increase biomass which would exert a positive effect on commercial revenue and jobs. I agree that in the short term, commercial fishermen would see a one-time bump in income if Kadashan Bay was open for crabbing. But long-term I think this change would not be in the best interest of commercial crab fishermen, the community of Tenakee as a whole, or the crab population in Tenakee Inlet.

I don't feel as strongly with regard to the proposal in the Elfin Cove area. Any regulatory change in Port Althorp is likely to have little immediate impact. To my knowledge, no one has commercially crabbled the area for a number of years. Sea otter depredation has reduced the local population to the point that a commercial fishery is economically unviable. For that reason I have no strong feeling on that part of the proposal other than disliking the misleading nature of the census data presented.



**Proposal 93:** I strongly urge the board to approve the proposal. Furthermore, I would ask that you consider granting ADFG blanket authority to extend a harvest reporting permit system to other areas of southeast Alaska as may be needed in the future. At this point in time Section 11-A may be the only "hot spot" that requires this level of attention, but as the personal use fishery expands, it is likely that ADFG will need to closely monitor harvest information in other areas as well. When that time comes I would prefer ADFG to have that authority in place, instead of needing to wait for another board cycle to request that authority. For example, Tenakee Inlet in District 12 is currently in the same status as District 11-A (closed to both personal use and commercial fishing). It might behoove ADFG to monitor harvest level if/when that area reopens.

The personal use shrimp fishery has been one of the fastest expanding fisheries in southeast Alaska. I support giving ADFG more tools with which to monitor that rate of expansion. I have full confidence that they will use a harvest reporting permit system appropriately.

**Proposal 94:** I oppose this proposal. I am not opposed to a spawner index management system if ADFG wishes to go that route. I am opposed to having it shoved down their throat at the board level. I recently fished in one of the key test areas that is referenced in the proposal. To the best of my knowledge the author does not have a pot shrimp permit, nor has he fished in that area recently in any capacity.

It is true that a local management biologist elected to close the fishery contrary to the spawner index protocol. This action was taken because the biologist felt that strictly following the test protocol would lead to overharvest. As someone who has recently fished in that area and was already concerned about overharvest, I appreciated that decision.

I understand that was a difficult decision to make. As Mr. Fisk correctly points out, the early closure compromised the science of the test fishery. At the same time, shrimp areas are fragile and sometimes have a history of very slow recovery from overharvest. I don't want to see an entire subdistrict sacrificed as a Petri dish for experimental management theories; particularly not an area which I fish. I understand the author's viewpoint, although I think it is easier to hold that view when your interest is purely intellectual (as opposed to having your livelihood directly tied to the long-term health of the shrimp stocks in question).

The spawner index system has served Canada well. However, their fishery is different from Alaska's in many ways. I support further investigation into the appropriateness of a spawner index management system, but I don't think the board needs to force it onto the department of fish and game.

**Proposal 95:** support

**Proposal 96:** support

**Proposal 98:** Some fishermen are still selling their shrimp direct to the public as "boat run," which is an unsorted random mix of all sizes. I would support this proposal as long as it was clear that this provision would not add an unnecessary burden on fishermen who don't sort



their shrimp by size. If the proposal is to force everyone to sort shrimp into sizes for sale, then I would oppose the proposal. Change language so it is clear that the size mix only needs to be reported if the fisherman is in fact sorting their shrimp, and it sounds fine to me.

**Proposal 99:** Oppose as written. First problem is that the proposal reduces small pots proportionately more than large pots. Small pots are reduced by nearly 30% while large pots are only reduced 25%. To be fair, the maximum limit of small pots should be 105 instead of 100. This would be a 25% reduction to both sizes. The second problem I have is the strict requirement on number of pots per string and distance apart. I see no need to micromanage to that level.

Overall, the author's description of the current state of the fishery is accurate and changes would benefit the fishery. I could support a pot reduction as long as it was applied evenly to both gear types (large and small pots).

Smaller shrimp tend to trickle out of shrimp pots over time. Checking the gear repeatedly in one day prevents the smaller shrimp from escaping. Some operators dump the smaller shrimp. There are concerns that the associated mortality has negative effects on the long-term sustainability of the fishery. Others don't dump the smaller shrimp, but there still exist concerns about the effect of harvesting more immature shrimp than necessary. Limiting to one pull a day would alleviate these concerns. It would also tend to stretch out the fishing season, which would give local managers more time to collect information and could make it easier to manage areas that have historically closed very rapidly.

It is worth mentioning that switching to only one pull per day would limit production for those boats who have the capacity or crew to run their gear more than once per day. It would not benefit the fleet equally. I believe the positive would outweigh the negative, but it would hurt some fishermen more than others and that needs to be recognized.

I like some of what I see here, but I want to see more flexibility in terms of pots per string and gear spacing in order to allow people to tailor their fishing practices to their own boat, gear, and fishing area.

**Proposal 101:** An interesting idea. Am curious to see the ADFG response. Would not be opposed to this as long as there were strict bycatch limits with a mandatory closure for exceeding bycatch of existing commercially utilized species. In some areas of southeast, non-spot shrimp are already targeted, albeit not to a large degree. I wouldn't want to see a summer season overlap with those areas, nor would I want to see them "accidentally" catch any significant number of spots.

**Proposal 105:** support

**Proposal 107:** I oppose the proposal. The commercial harvest in the area is of very limited duration and take.



**Proposal 148:** I oppose the proposal. I don't want to see "subsistence" fishing on a commercial scale. Subsistence harvest should continue to be made using customary and traditional means. The ride through Icy Straits has always been "dangerous and costly," depending on weather conditions, and I fail to understand what has changed in this regard.

I understand the concern for low-income families, and I might not oppose the proposal if it was limited to demonstrably low-income households. But writing the proposal for the whole community of Hoonah opens up a whole different can of worms. It also substantially changes the meaning of subsistence fishing as I understand it.

**Proposal 155:** I oppose the proposal. I would prefer to see more enforcement to prevent this "very common practice." In my opinion the likely result is more fish being caught, eventually leading to bag limit reductions. This will hurt individual anglers who don't fish with a party, or people who are currently abiding by the law.

**Proposal 157:** Well, this would sure make it easier to catch a legal fish. At the same time, it doesn't seem like there is a problem meeting quota allocation with the 28 inch limit. What would happen if there was a 26 inch limit? It seems like the sport allocation would be reached more quickly. Bag limits might need to be adjusted to reflect this fact.

**Proposal 174:** I oppose this attempted resource grab by the Territorial Sportmen Inc. They would have more credibility with me if they were willing to close the sport king salmon fishery in Districts 11, 14, and 12 (north of Point Couverdon) in conjunction with a commercial closure,

Some of the description in the proposal seems misleading. For example, to refer to the commercial troll fishery as having "few regulations or controls" is probably news to Alaska Department of Fish and Game.

**Proposal 176:** I support attempts to get trollers within their allocation limits.

**Proposal 192:** I believe this is already required. Don't fish tickets have an area for recording personal use salmon that were commercially harvested? I could be mistaken, but this appears to be redundant. If I am mistaken, then I have no objection.

**Proposal 193:** The authors of this proposal offer no evidence in support of their claim that "purse seine effort...has interfered with the ability of Angoon residents to meet their subsistence needs for salmon." I can't support such a drastic step without being sure that it is well-directed. I realize it is outside the scope of the Board of Fish, but I would prefer to see some money directed toward researching the run characteristics of the sockeye stocks in question. The proposal is too poorly reinforced factually to be supported at this time.

**Proposal 194:** Insufficient information aside from author's opinion. Commercial seining in the area may have increased recently. But I have to oppose this without more data on historical catch rates and an analysis of how they may have changed.

**Proposal 195:** See above. Demonstrate a problem with coho salmon returns first.





**Proposals 196 and 197:** I have no problem with gathering more information. It may be difficult to overcome bureaucratic inertia, as ADFG doesn't like to change their statistical gathering procedures. However, it seems that in this case no information will be lost, and additional information (potentially useful) would be available moving forward.

**Proposal 199:** See comments on Proposal 193. I recognize that Angoon residents have encountered difficulties recently in meeting subsistence needs. However, they need to demonstrate a cause and effect relationship between their harvest and the proposed solution. The proposal is insufficiently supported.

I'm not sure that I would like to use a 65 year old chart (Goldschmidt & Haas, 1946) to delineate the area of the closure.

**Proposal 200:** See above. A number of these proposals are very similar in their proposed solution to a problem, but they all lack any evidentiary underpinning.

**Proposal 220:** I oppose this. I understand that moving the boundary line farther out to sea will expand fishable area and probably increase catch rates on some days. But I don't understand why Yakutat fishermen deserve special treatment. What is the criteria for deciding when to extend the winter troll boundary? As I understand it, one reason for having a winter boundary line is exactly to restrict access and to keep catch rates low. If the Yakutat fleet gets their winter line moved out to sea in order to increase access will other communities follow suit? Should we do away with the winter boundary line altogether? After looking at a map of the proposed area, it appears the line in Yakutat is already too far outside the surfline and it should be moved the other direction if anything.

**Proposal 221:** I don't have a problem with this. Icy Bay is inside the winter surfline. I agree it is likely to have minimal impact.

**Proposal 223:** I have mixed feelings on this proposal. I agree with the 5 points at the end of the proposal. Given my fishing patterns and boat size, the proposal would probably benefit me personally.

On the other hand, this proposal would largely take away fish from the high-volume producers who target the high abundance king salmon areas, especially those who fish on the Fairweather grounds. Those salmon would be redistributed in August to the whole fleet, especially those fishing closer to the beach and to the benefit of lower-volume boats that can't pack as many fish in their holds.

I am an ATA member and I understand ATA opposes the proposal. I think this change would help the overall troll fleet as a whole, but at the expense of some members. In general I don't favor redistributive proposals like this without good reason. I do think there is some good reason here, but I don't know if it is a good ENOUGH reason.



**Proposal 224:** I support this as long as there is some verifiable measure or trigger to determine when "too few" kings remain on the quota. For example, when there are less than 3,000 kings left.

**Proposal 228:** I oppose a mandatory 10 day troll closure in all of southeast Alaska just to support the village of Angoon's subsistence coho fishery. Living in Tenakee, just across Chatham Strait from Angoon, the best coho fishing here occurs in the rivers in late fall. It is likely the same near Angoon. A 10 day closure in August is unlikely to have much effect on their subsistence coho fishery. Moreover, it seems excessive to close fishing region-wide. This feels like using a sledgehammer to kill mosquitos. Perhaps a reworded proposal that closed fishing in the area directly in front of Angoon would be just as useful and less economically damaging.

As in other proposals relating to Angoon subsistence concerns, it seems to me that the next step needs to be to develop information regarding the cause of the problem. Perhaps that step has been taken, but if so I couldn't tell from the way this proposal was presented. More information regarding a cause and effect relationship between the commercial fishery and the subsistence fishery is necessary.

**Proposal 230:** I oppose the proposal. I support measures that will increase troll access in order to redress the current allocation imbalance. Chum trollers in this area are a good step toward getting allocation back where it should be. Passing this measure would only work to exacerbate the allocation imbalance.

That wraps up my thoughts on the matters before you. If you have any questions regarding my testimony you are welcome to contact me individually or as a group.

Sincerely,

A handwritten signature in black ink that reads "Zeb Strong".

Zeb Strong  
(907-321-3414)  
zebstrong@yahoo.com



Larry & Janice Schultz  
PO Box 644  
Tenakee Springs, Alaska 99841

December 18, 2014

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



To The Board of Fish and Game,

As a 24 year resident of Tenakee Springs we want you to know that we are opposed to the change to repeal of the restrictions on commercial Dungeness crab fishing in the Tenakee area. If you repeal the restriction on the Dungeness crab they will quickly deplete the resource of Dungeness crab just like what happened to the local shrimp fishery which has been closed for four years now with no opening in site. By keeping the area restricted to commercial use it maintains a viable fishery for sport and personal use in the restricted part of inlet while enhancing that fishery for the unrestricted areas of the inlet that already exist.

Please don't allow what happened to our shrimp to happen to our Dungeness crab also.

Please contact us if you have any questions.

Sincerely,

Larry & Janice Schultz  
PO Box 644  
Tenakee Springs, Ak. 99841

12/16/2014

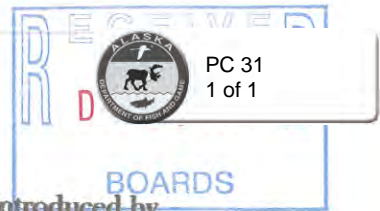
I am writing in opposition of Proposal 71-5AAC32.150. Closing the waters in Registration Area A. To Close Commercial Dungeness Fishery in a portion of Whale Pass, proposed by the Whale Pass Community Association. I, Joshua Miethe, oppose this proposal on the grounds that the reasoning's behind this proposal are unfounded. I have commercial crabbed fished Whale Pass for the last 10+ years and I have shared these waters with the community members of Whale Pass, in their endeavor to sport fish. I am a conscientious fisherman and I understand the meaning of over fishing. Why as a fisherman would I want to deplete the crab stocks in this area, so in future years, I would need to find new grounds for this portion of my gear? This proposal has little to do with over fishing. I have documented proof that on the last day of our Dungeness season in 2010, we were pulling pots loaded with crab. When speaking to a store owner in Whale pass, I was shown a Lund skiff filled to the sides with Dungeness crab. The owner used this photo to reference, how the sport fishing use to be before the commercial crabbers came. As I studied the photo I saw that there were an array of different size crab and the sheer number was more than could be utilized by even the whole community at one time. The idea of closing the proposed waters of Whale Pass would only help to justify a few people's ideas of how crab sport fishing should be or use to be. This proposal addresses a new area to be closed to commercial fishing; an area that is really important to the few crabbers in this area. This proposed area has produced crab for us all, annually, for the past seasons with no evidence of problems from the community or overfishing. The sport fisherman have an ample area to sport fish that has already been closed to commercial fishing in Whale Pass. Due to the devastation of the Dungeness crab numbers by sea otters on the coast and lower Chatam Straits, Sumner Strait and Sea Otter Sound, crabbers have a lack of available lucrative fishing grounds. Closing additional areas with a history of landings in Southeast, only causes too many pots on other available areas. Whale Pass can only accommodate a small percentage of my pots and I take the responsibility of maintaining these stocks very seriously, as this is my future. This 2014 season proved that stocks have maintained and rebounded and that my way of fishing has paid off, in ensuring there will be available crab to me in the coming seasons; crab that I rely on being available to me and my family. When fishing among sport pots, I am very respectful in my fishing habits and know for a fact due to my catch rates and logs, that there is definitely enough crab for everyone. The last few years it seems the sport fisherman have tried to make it difficult for the commercial crab fisherman, even though our pots are only in this area for a short time. They leave plenty of floating line for us to tangle with and have even become so bold as to run our gear and steal our pots. I presume, since I pull full pots of recruits and large males till the last day of my season, that there are ample crab for subsistence fishing, throughout the year when our gear is put away and the season is over. Shutting this area will only satisfy a few and devastate many. We fish Whale Pass even though it is rough to get to and can only handle a limited number of pots, because it is a unique spot that can be nurtured and respected to accommodate us all. 75% of my income comes from the Dungeness fisheries, I have a lot at stake and I, and my fellow fisherman in the area are intensely aware of the fragility of our fisheries and we don't treat this area with the mentality to take as much as we can. We take great care in preserving the few spots we can still fish without depleting future stocks. I have log entries to prove that we are not seeing a depletion of the crab stocks in this proposed area and there is room and crab enough for everyone.

Thank you for your time,



Joshua Miethe, F/V Ricky. Box 2031, Wrangell, AK. 99929 (907)874-3906

City of Tenakee Springs  
Resolution 2015-10



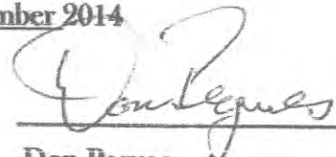
In the Council  
December 19, 2014

Introduced by  
John Wisenbaugh

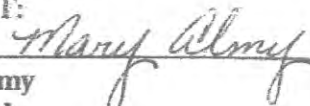
**A RESOLUTION FOR THE CITY OF TENAKEE SPRINGS, ALASKA  
SUPPORTING CONTINUED CLOSURE UNDER 5 ACC 32.150(2) OF A PORTION OF TENAKEE  
INLET COMMERCIAL DUNGENESS CRAB FISHING**

- WHEREAS, commercial fishing pressure on Dungeness crab stocks in the early 1980's made it difficult for citizens of Tenakee to catch an adequate amount of Dungeness crab for subsistence, personal use and sport needs; and
- WHEREAS, the Tenakee Fish and Game Advisory Committee proposed to the State of Alaska Board of Fish the closure of a portion of Tenakee Inlet to commercial Dungeness crab fishing; and
- WHEREAS, the Board of Fish adopted such proposal as 5 ACC 32.150(2); and
- WHEREAS, there are now healthy populations of Dungeness crabs in the closed area which supplies the needs of the residents and visitors; and
- WHEREAS, there is strong anecdotal evidence that Dungeness crab migrate out of the protected areas and recruit to the Tenakee Inlet commercial crab fishery benefiting local fisherman and the economy; and
- WHEREAS, there are currently before the Board of Fish proposals 70-79 to create other small closed waters to protect local stock; then
- THEREFORE BE IT RESOLVED** by the *Common Council of the City of Tenakee Springs, Alaska*, to support leaving 5 ACC 32.150(2) as currently written, maintaining the local closure; and
- THEREFORE BE IT FURTHER RESOLVED** that the City of Tenakee Springs, Alaska supports adoption of proposals currently before the Board of Fish to create protected zones which should benefit subsistence and commercial crab fisheries.

**ADOPTED 6 ayes, 1 absent THIS 19th DAY OF December 2014**

  
\_\_\_\_\_  
Don Pegues  
City Council President  
Ex officio MAYOR

ATTEST:

  
\_\_\_\_\_  
Mary Almy  
City Clerk



**Leonard Leach**  
F/V Towego  
P.O. Box 6017  
Ketchikan, Alaska 99901

---

December 27, 2014

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

Dear Chairman Johnstone and the Alaska Board of Fisheries,

I oppose proposal number 71 to close commercial Dungeness crabbing in waters adjacent to Whale Pass. For forty years, I have gillnetted and tendered in Coffman Cove which is located very close to Whale Pass. I have never had any problem catching Dungeness crab in this area.

I see a large problem developing if communities are allowed to create exclusive areas for sport fishermen. This desire for exclusive rights stems from an ever increasing influx of summer people seasonally living in these communities wanting to catch enough seafood to fill their freezers down south. If this proposal passes, it will open the door to create exclusive rights for sports fishermen in other areas including shrimp, salmon, and bottom fish.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Leonard Leach".

Leonard Leach



12-24-2014

Box 31

Tenakee Spgs., AK.

99841

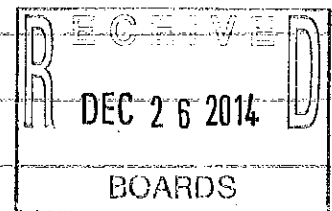
Alaska Dept. of Fish & Game

Board of Fish

S.E. Region

P.O. Box 115526

Tuneau, AK. 99811-5526



Dear Sir:

At a recent city council meeting there was a request by commercial crab fisherman to have the Kadishare subsistence crab area opened to commercial crabbing. I am opposed to this, as it should remain as it is. I have lived in Alaska seventy three years, with the last twenty four in Tenakee. This area was established long before I moved here and is special as I know of no other area in southeastern Alaska like it. It should remain as it is. Thank you.

yours truly  
Lawrence Mary



Proposal 69 AAC-32.150

Dear Board of fish

I Have been a commercial fisherman in S.E. Alaska for 34 years. Dive, halibut, Salmon troll. Used to do a lot more - pound, etc.

Anyway we are also a very subsistence oriented Alaska family. Usually try to get up to Tenakee every year because the crabbing is so good. Shrimping used to be too but that was destroyed by commercial over harvest.

Please do not open dinginess crab to commercial use in the Tenakee closed area. Many residents use this area as a vital source of subsistence,  
Thank you for reading this

Shona Swenson

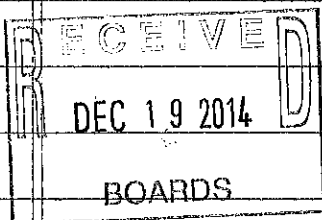
V F/V Dryas

POB 6224

Sitka, Alaska

99835

snorkel@itka@yahoo.com







12/11/14

To Fish and Game Board,

I am writing to oppose Proposal 71 that would close commercial crab fishing in portions of Whale Pass. I have commercially fished Dungeness crab in years past in that area and see no reason to restrict it any more than it is. There is a lot of area with plenty of room and crab for the "summer folks". A portion of the bay is already restricted from commercial fishing. With the advance of sea otter populations this would further compress Dungeness fishing into less ground. Leave the law the way it is.

Thank you,

Kevin Castle

Craig, AK





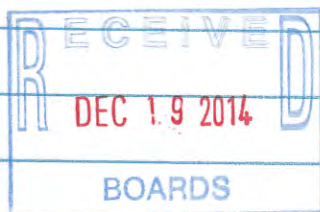
12-16-14

I oppose Number 71 -  
SAAC 32150 to close waters  
of whale Pass to commercial  
crab fishing

I have property in  
Collman Cove & there has  
been no shortage of crab in  
this area.

The reason the summer  
people don't catch crab is that  
they have poor pots & pull  
pots belonging to others.

*Perry A. Leach*  
Perry A. Leach





## Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

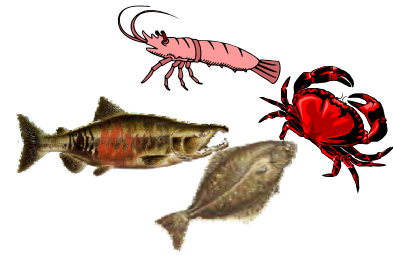
Juneau, AK 99801

Phone: 907-586-6652

Fax: 907-523-1168

Email: [seafa@gci.net](mailto:seafa@gci.net)

Website: <http://www.seafa.org>



January 6, 2015

Alaska Dept of Fish and Game

Board of Fisheries

PO Box 115526

Juneau, AK 99811

Dear Chairman Johnstone and Board of Fish Members,

RE: Comments on January SE Shellfish Proposals

Southeast Alaska Fishermen's Alliance (SEAFa) is a non-profit multi-gear/multi-species membership based association. We represent our 300+ members and businesses involved in the salmon, crab, shrimp and longline fisheries mainly based in Southeast Alaska and Yakutat. Most of our members sport fish/hunt, personal use or subsistence fish (through retention of commercial catch or subsistence fishing).

### **DUNGENESS CRAB**

The commercial Dungeness crab fishery is an important fishery to the economy of Southeast Alaska. The 2014/15 season estimated as of Nov 30<sup>th</sup> was worth \$15 million<sup>1</sup>. While the numbers of participants in this fishery is variable, the recent five year average is 169 participants out of the 279 limited entry & interim permits available. Most of the vessels participating in the Dungeness crab fishery are under 58' and many are small skiffs where weather is a major factor in their participation. Crab harvests are very cyclical in nature all up and down the west coast.

<sup>1</sup> Communications with ADF&G Biologist Stratman



Any closure of additional areas to commercial Dungeness crab fishing considered, we recommend that the Board of Fish consider the same area be closed to sport fishing.

Proposal 58, 59 & 60: Support

SEAFAs support management of the Dungeness crab fishery by 3S management (size, sex & season). Marine Stewardship Council has certified the Oregon Dungeness crab fishery using a 3S management scheme as sustainable. Oregon uses a size limit of 6-1/4", this is 1/4" smaller than our size limit of 6-1/2".

Proposal 61: Oppose

SEAFAs oppose a management scheme that has changing season dates. In addition, ADF&G does not have the funding necessary to conduct this type of sampling particularly in this time of declining budgets. The terms soft-shell and light crab are used interchangeably even in the management plan although there is a great difference in the mortality of soft-shell vs light crab.

Proposal 62: Oppose

SEAFAs oppose this proposal to manage on a district level with varying seasons and opening dates. The Dept does not have the funding for this type of management. In addition this would put extra pressure on crab stocks around communities by having different dates and seasons, you will concentrate effort in the area that is just being opened. The Dungeness crab fishery has been successfully managed under 3S management and the region-wide management plan. The mortality of handling soft-shell crab is not the major threat to the sustainability of the Dungeness crab fishery, the threat is the ever increasing expansion of sea otters.

Proposal 63: Support with modifications

SEAFAs submitted this proposal that adds an additional tier to the Dungeness crab management plan. After reading the Dept. comments and talking to staff we understand some of their objections but still feel that the intent of this proposal is valid and a compromise may be possible. Our concern that we were trying to address is if the threshold is not reached several years in a row and the summer season is shortened, the only option that is available in the plan for the fall season is a shortened 30 day season



or a full season. We would like the Dept to have the flexibility to adjust the fall season as they are allowed to adjust the summer season based on all information available including effort and expansion of sea otters (loss of productive grounds) even if not spelled out within the management plan. We also believe that having the flexibility to consider other factors in the projection in the future may be important.

Proposal 64: Oppose

SEAFSA opposes this proposal that would repeal the soft shell (light crab) section of the management plan. The Dept has shown that the consideration of light crab in the calculations has improved the accuracy of the harvest projection as shown in 2013.

Proposal 66: Oppose

The Dungeness crab fishery is managed on a region-wide basis. Moving to a district or sub-district level management would actually make the fishery more consolidated and cause more conflicts between sport and commercial fishermen as the grounds contract due to sea otter expansion. This proposal would be costly for the Dept to implement.

Proposal 69: Support

SEAFSA supports re-opening the areas described in the proposal for the reasons given in the proposal. SEAFSA also supports any waters closed to commercial Dungeness crab fishing having the same area closed for the sport fishery so that the benefits of the crab closure areas goes to the residents of the local community as intended.

Proposal 70: Oppose

This proposal is to close a portion of Hetta Inlet and Sukkwan Strait to commercial Dungeness crab fishing. SEAFSA is opposed to this closure. Closing huge areas to commercial fishing creates consolidation and congestion of pots in the areas remaining, this in turn impacts other communities that then ask for the area around their community to be closed. If an area is to be closed to commercial fishing then it should also be closed for sport fishing leaving the area open for subsistence and personal use fishing only. The staff comments states that a household survey was conducted in 2013 showing a harvest of 5,045 pounds of Dungeness crab harvested by Hydaburg residents or a 15 pounds per capita. This level of



harvest shows that the community of Hydaburg is having a reasonable opportunity to harvest crab for their subsistence needs. The area being requested is significantly more than the area the household survey showed as being used.

#### Proposal 71: Oppose

This proposal is to close a portion of Whale Pass to commercial Dungeness crab fishing. SEAFA is opposed to this closure. As the staff comments point out this area was re-opened for a fall season only in 2009 after being closed to commercial fishing for six years. This was a good compromise made in 2009 as most sport and personal use crabbing occurs in the summer months when it is closed to commercial fishing and still allows for a commercial opportunity in a productive area. It does not appear that having the area open in the fall has affected the ability for local households to get crab for their subsistence needs. SEAFA also supports any waters closed to commercial Dungeness crab fishing having the same area closed for the sport fishery so that the benefits of the crab closure areas goes to the residents of the local community as intended.

#### Proposal 72 & 73: Oppose

These proposals are to close portions of District 6 & 8 to commercial Dungeness crab fishing. SEAFA is opposed to this closure. District 6 & 8 are very important to the commercial Dungeness crab overall harvest. Many of the skiffs that participate in the Dungeness crab fishery fish in these districts. Closing the area close to Petersburg would create consolidation of pots in front of another town and would impact the small entry level businesses, particularly those fishing out of skiffs. SEAFA also supports any waters closed to commercial Dungeness crab fishing having the same area be closed for the sport fishery so that the benefits of the crab closure areas goes to the residents of the local community as intended.

#### Proposal 74: Oppose

This proposal would close a portion of the Big Bear/Baby Bear Marine Park to commercial Dungeness crab fishing. SEAFA is opposed to this closure. The proponents of the proposal states, that commercial fishing inhibits the purpose of state marine parks. The Alaska State Legislature designates Marine State Parks and at the time is aware of the activities that occur within the area, particularly commercial fishing and on those Marine State



Park designations that SEAFA has followed made it clear in the committee discussion that commercial fishing fits within the purposes of Marine State Parks. This is an area that does not have a lot of individuals participating in the commercial harvest of crab as the numbers are below the confidentiality level, but moving several more boats into the more congested areas will have an impact on other communities and the fishermen themselves. SEAFA also supports any waters closed to commercial Dungeness crab fishing having the same area closed for the sport fishery.

Proposal 75: Oppose

This proposal would close a portion an area around Angoon for commercial Dungeness crab fishery. SEAFA opposes a closure of this size. SEAFA also supports any waters that are closed to commercial Dungeness crab fishing having the same area closed for the sport fishery so that the benefits of the crab closure areas goes to the residents of the local community as intended.

Proposal 76: Oppose

This proposal would close areas around Horse and Colt Island near Juneau. SEAFA is extremely opposed to this proposal. There is a lot of area near Juneau that is closed to commercial fishing. Additional area is not necessary for this community. SEAFA also supports any waters closed to commercial Dungeness crab fishing having the same area closed for the sport fishery so that the benefits of the crab closure areas goes to the residents of the local community as intended.

Proposal 77: Oppose

This proposal would close areas around Portland Island/Lena Point near Juneau. SEAFA is extremely opposed to this proposal. There is a lot of area near Juneau that is already closed to commercial fishing. Additional area is not necessary for this community. SEAFA also supports any waters closed to commercial Dungeness crab fishing having the same area closed for the sport fishery so that the benefits of the crab closure areas goes to the residents of the local community as intended.

Proposal 79: Oppose

SEAFA opposes this proposal for a closed area in portions of Chilkat and Chilkoot Inlet. The proposer is afraid that the crab stocks are on the brink



of collapse and using Yakutat as a comparison. The decline of crab in Yakutat is a mainly a cause of sea otter predation and the main reason the stocks aren't rebuilding.

With the sea otter expansion in SE Alaska, lower crab/shellfish harvests most likely will not have anything to do with commercial overharvest of the stocks and can cause the situation that currently exists in Yakutat where the remaining sea otter population keeps eating the crab before they get to legal size. There appears to be a slight increase in the biomass of the crab population as the sea otters have started to starve themselves out of the area. This information is based on conversations with local Yakutat residents and members of SEAFA.

Based on the staff comments for this proposal and Table 70-1 average CPUE for the Lynn Canal is the third highest of the areas listed.

### **KING AND TANNER CRAB PROPOSALS**

Proposal 84: Support

SEAFA supports this proposal that would allow for the Golden King Crab (GKC) fishery to be opened under the conditions of a permit issued by the commissioner. This should allow for a small controlled fishery to be prosecuted sooner in Yakutat as the fishery can be used for data gathering and sampling. The Yakutat region is struggling economically and any options that allow for increased economic opportunities are important to the community.

Proposal 85: Support

SEAFA supports this Dept proposal for logbooks in the Yakutat King crab fishery.

Proposal 86: Support

SEAFA supports this proposal to allow the use of square pots in the Yakutat king crab fishery. This allows fishermen to use their current pots and not have to purchase different pots to participate in this fishery. The Dept does not see where this change would have any impact on their ability to manage this fishery.

Proposal 87: Support

SEAFA supports this ADF&G proposal to lower the number of pots in the Yakutat king crab fishery.





Proposal 89: Neutral

SEAFa supports the intent of the proposal to create a new fishery area for GKC in an unfished area to determine its potential but supports the Dept's position that this should be done through the use of a Commissioners permit.

Proposal 90: Support

SEAFa supports the Yakutat Advisory Committee proposal to reduce the number of pots in the Yakutat Tanner crab fishery and the Dept's suggestion that a logbook program be implemented in order to provide the tools for a more orderly and sustainable fishery.

Proposal 91: Support

SEAFa supports this housekeeping proposal.

### **SHRIMP PROPOSALS**

The commercial pot shrimp fishery provides an average economic value of approximately \$2,038,350<sup>2</sup> for 103-109 active permit holders. Most shrimp fishermen are combination vessels with shrimp being a portion of their fishing business but an important fall fishery to these fishermen.

The Fishery Management Report 14-47, 2015 Annual Management Report for Southeast Alaska and Yakutat Shrimp Fisheries mentions several management concerns (page 44) including the number of latent permits not actively fishing in this fishery, the amount of personal use, sport and subsistence catch may be a significant component of the overall harvest and concerns about the shrimp task force. While earlier in the document they acknowledge the changes made to the makeup of the shrimp task force, this section does not and mentions the lack of elections which were eliminated and lack of community representation. The fishing associations that represent fishermen do pass on information and have many conversations amongst themselves that then ask the chair of the task force to contact the Dept. A Shrimp task force meeting is scheduled for the night before the Board of Fish meeting.

Proposal 94: No Position

---

<sup>2</sup> CFEC P91A Shrimp, Pot Gear, Southeast Basic Information Tables (BIT) average of 2009-2013. BIT tables are Jan 1-Dec 31 but majority of harvest occurs before the end of the year.



SEAFSA is not ready to fully support a spawner/index management system although our shrimp fishermen are not happy with the current system as accurately reflecting the shrimp fishery biomass changes in a timely fashion. SEAFSA also does not feel that the Dept studies of a spawner/index management system are an accurate reflection of that type of management as they used a modified study that changed the program and therefore the results substantially. We are concerned that with the current price of oil and looming budget cut the Dept would not have adequate funds for this style of management.

Proposal 95: Support

SEAFSA submitted and still supports this proposal.

Proposal 96: Support

SEAFSA supports this proposal of ours. The new regulatory language of this proposal is the same as Board Member Kluberton suggested in RC 29 in 2012 to allow for experimental fisheries within the management plan. If the Dept can continue to try experimental management strategies such as occurred in Districts 6 & 7 using the CPUE from logbooks without this language in regulation then we are content to have the Board take no action on this proposal but we are not interested in having the board take no action and then have the Dept tell the shrimp fishermen and shrimp task force that they can't continue the in-season experimental management because they don't have the authority in the management plan or the tools.

Proposal 98: Amend and Support

SEAFSA supports mandatory reporting of size categories by catcher-sellers in order to provide the information that will possibly help lead to in-season management. At this time we are fine with allowing catcher-sellers to not report their size limits.

Proposal 99: Oppose

The Dept has been able to manage the fishery under the current limit of pots. As an association we have not had any shrimp fishermen approach us with the need to reduce the number of pots since the new pot limits were standardized in 1997 and with so many latent permits in the fishery.

Proposal 100: Support



SEAFa supports this housekeeping proposal to bring clarity to the regulations.

Proposal 101: Oppose

SEAFa opposes this proposal. Already there is an unknown amount of removals of shrimp in the sport, personal use and subsistence fisheries which has been increasing during the summer months. This is a management concern of the Dept in regards to the pot shrimp fishery and their management as stated in the Annual Management Report (fmr 14-47, page 44) The shrimp management plan 5AAC 31.145(b)(C) encourages management to reduce mortality of small shrimp. This proposal is actually trying to target and exploit the complete opposite of the management plan requirements. You would also have to consider the conflict with and harvest of the beam trawl fishery.

Proposal 107: Oppose

This proposal would close portions of the waters in District 6 & 8 to commercial shrimp fishing both pot and beam trawl. SEAFa opposes closing these waters to commercial shrimp fishing.

Proposal 113: Oppose

SEAFa opposes this proposal by the Naha Conservation Society to establish a marine conservation zone which would prohibit all fishing (commercial, sport & personal use) bottomfish, crab and shrimp. This proposal was considered in 2012 and did not pass and we do not see any conservation or biological reasons on any of these species for adoption this cycle. There is closed waters near Cache Island already.

**SPORT, PERSONAL USE AND SUBSISTENCE**

Proposal 80: Oppose

This would change the regulations of the George Inlet super-exclusive guided sport ecotourism Dungeness crab fishery. We oppose changing the buoy marking requirements. As staff comments, this raises enforcement concerns about who is responsible for the pot. We are opposed to raising the number of pot per registered sport fishing operator. If this area truly has a soft shell problem in the summer months (reason for not having a commercial fishery in this district that matches the rest of SE, then putting out more pots where you are re-handling the crab is irresponsible.

Proposal 93: Support

SEAFa supports the Dept proposal to require personal use and sport fishermen in District 11-A to obtain a shrimp permit/harvest record. We believe that this is a good start to getting information about the use of this resource.

Thank you for considering our comments. We will be at the meeting and look forward to providing more information or expanding upon our positions. Our position on shrimp proposals will be better informed after the shrimp task force meeting on January 20, 2015 in Wrangell.

Sincerely,



Kathy Hansen  
Executive Director



Submitted By  
Skiff Lobaugh  
Submitted On  
1/6/2015 8:11:34 PM  
Affiliation

Phone  
907 723-4034

Email  
[skiff@gci.net](mailto:skiff@gci.net)

Address  
1013 Bonnie Doon  
Juneau, Alaska 99801

~~Board of Fisheries:

To whom it may concern:

I am writing in support of the board of fish to close the waters on the East side of Mansfield Peninsula around Horse and Colt islands to commercial Dungeness crab harvest. First some of my back ground, I have recreated in this area for the past 40 years and have also spent many of my summers while growing up in Southeast Alaska working on commercial fishing boats. I have worked gill netting, crabbing, shrimping, as well as long-lining for black cod and halibut. I also received my bachelors in science from Washington State University in the area of Environmental Science and Regional Planning. This has given me a unique prospective of the issues that surround both the personal use and commercial use in Southeast Alaska fisheries.

There are many reasons that commercial Dungeness crab fisheries should be closed in this area. First and foremost the fishing pressure by the commercial fleet is unsustainable. Second many of the commercial boats have been very poor neighbors and have not respected other gear groups in the area. Finally and equally important is a safety issue.

Quite simply the commercial fleet is overharvesting in that area. They place hundreds of pots in a very small area and literally wipe out all legal sized crab. When I was younger it was possible to get anywhere from five to twenty legal size male Dungeness crab per pot. Now when I fish three pots I am lucky to get two or three legal crabs and many times I am skunked. I have also noticed that the population does not rebound as quickly in this area. What I mean by this is after the commercial boats season is over it takes many months and sometimes up to a year before you can get any amount of legal crab, and by then the season is open again and there are several hundred more pots dotting the area. Those who say the numbers are exaggerated I argue have not run their boat from piling point down to admiralty cove during commercial Dungeness season.

Sadly I also have witnessed many times when a commercial boat has either pulled my pot or has driven over my buoy only to have the line cut and my pots lost. My family has a cabin in this area so I am there quit frequently. I have sat on the beach, sometimes around 20 yards away, and watched commercial boats pulling private pots and running over both commercial buoys as well as private buoys. The pulling of other peoples pots could be dismissed as an enforcement issue not a regulatory issue, and I agree. However, without proper enforcement the next logical argument is to close the area. The problem with large commercial boats running over other people's pots is quite simply that there are way too many pots in a small area.

The area that is proposed to be closed is one of the few places where personal use small boats can go to get Dungeness crab. The larger commercial fishing boats are able to go farther to other fishing grounds and let some of the areas around Juneau for personal use fisheries. When the larger commercial fishing boats throw down hundreds of pots it forces the smaller boats to go out farther for a limited resources. With the unpredictable nature of weather in Southeast Alaska it can force smaller boat owners to face larger waves and longer trips in inclement weather. Historically the commercial fleet has been good neighbors and not forced small personal users out of the area, this is no longer happening so sadly we have need to start regulating and closing areas to allow every group access to this resource.

For many years we have coexisted with the commercial fleet who have left areas close to Juneau for personal use. They used to be good neighbors and self-regulating. Growing up and working on the boats I remember many conversations around a coffee pot when the captains of the commercial fleet talking about giving room for personal use and not forcing conflicts between the two gear groups. I have noticed that this has not been the case for about the last eight to ten years and it is not getting any better. Unfortunately this is a time of the past and we will need to increase the regulations to ensure all gear groups are given access to the resources.

Thank you for your consideration of this proposal  
Skiff Lobaugh  
1013 Bonnie Doon  
Juneau, AK 99801



Submitted By  
Stacy Sundborg  
Submitted On  
12/30/2014 12:38:11 PM  
Affiliation

I am writing in opposition of proposals 76 and 77.

As a Juneau resident participant in the personal use Dungeness crab fishery, I feel these proposals are requesting to set aside a special fishery for a specific neighborhood. I do not live in a location where I can set crab pots in front of my house, therefore I have to take them to other locations such as Lena Point, Horse Island, and Colt Island. I fear these residents will become territorial over these locations if these proposals are passed. Keep in mind, these residents did not purchase the water along with the property on these islands. If it gets closed to commercial crabbing, what's next? Will residents next decide they want exclusive salmon fishing rights in front of their properties and ask to have a closed salmon fishery for personal use only?

These residents can do what everyone else, including myself, do and not set pots during the commercial openers. It's only a few weeks in the year when the commercial boats are fishing and I can go out all the other times and fill my pots. Commercial fishermen need to make a living and they are doing nothing wrong by setting their pots in desirable locations. We must share our resources-not make them exclusive to one user group.



Submitted By  
Steve Box  
Submitted On  
1/7/2015 10:24:39 AM  
Affiliation  
Commercial dungeness fisherman

Phone  
907-321-0596

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

Address  
1512 Ling Ct  
Juneau, Alaska 99801

Board of Fish,

In regards to all of the Board of Fish proposals #'s 70-79 that have to do with any closure of area for the Southeast Alaska dungeness fishery, I strongly disagree with all of them. The dungeness fishery has been experiencing loss of area due to predation of sea otters and designated sport fish areas for years and can't afford to lose any more area. The amount of gear that's crowding existing grounds is already too much. If we lose more area, we again become more condensed and even more crowded in other areas that are open. The areas that people are wanting to restrict to sport fish only around Juneau, Horse and Colt, Portland Island and Lena have been fished commercially for years. We have already designated sport fishing areas around Juneau and many other communities for the ease of sportsman to catch their share of crab. I strongly believe that if sport fishermen want less pots in front of their cabins, they should put their energy into advocating for a permit reduction for the entire fleet instead of trying to close more area to commercial use. We have the same number of permits fishing less than half of the area we fished 10 years ago. A permit buy back is a good solution for pot reduction and should be closely looked at. Trying to close more areas in front of remote properties just for the convenience of sport fisherman is becoming a trend that needs to stop.

Sincerely,  
Steve Box

Steve's iPad



Submitted By  
Wayne Mathisen  
Submitted On  
1/7/2015 3:50:42 PM  
Affiliation

I want to comment on Proposal 107-5AAC31.136 , Closed waters in Registration Area A . I object to the closure of the area including Suqoi Islands to commercial pot fishing for spot shrimp. I personally have fished ther since the 70's . I started fishing there on the F/V Symphony with my Dad , who pioneered the spot . He built many of the pots we used by hand before we were able to buy them premade . I still fish there commercially , on the F/V Symphony , and my son was my deckhand October 2014 on that very spot . So it's a family tradition . There were never any sport pots in the area before my Dad fished there . Boat traffic goes right by there , so later on the sport guys showed up because they saw us fishing there .....and they have it all to themselves for most of the year , because the commercial fishery only lasts for a few weeks . In October . My Dad would wait till I got out of highschool at 3 PM to go fishing with him , crabbing and shrimping all over the area here around Petersburg , in the fall , winter , spring , and summer , including the Scow Bay area and the Stikine Flats . I want to be able to continue doing so . To close an area near Petersburg could possibly be detrimental to a local permit holder , like myself , who needs to make a living even in the wintertime , when the weather is often brutal . Being able to fish there with my son means a great deal to me . I proudly think of my Dad , using ingenuity and a lifetime of fishing experience in Alaskan waters showing me the ropes and finding the shrimp right there , many years ago , and I plan to show my son those very ropes , as my Father did for me . I learned from the best . Bouy Bag hunters found the spot , and sport pots have been there ever since . Don't close the area near Sukoi Islands in district 8 to the commercial taking of spot shrimp .





Comments by Max Worhatch for the Alaska Board of Fish, Southeast and Yakutat Crab, Shrimp, and Misc. Shellfish, January 21-27, 2015.

Member of the Board of Fish:

I am a commercial fisherman from Petersburg. I fish for salmon, herring, crab, and halibut. I am currently the President of the United Southeast Alaska Gillnetters. I also serve on the Petersburg Advisory Committee to the boards of Fish and Game. Please regard my comments for the following proposals.

Proposal 58- I support this proposal, as I am the author. I also support proposals 59 and 60, since they call for the same thing. It is my feeling that the current regulation does nothing to enhance or improve the fishery. While the first weeks landings have been somewhat of an accurate indicator for projecting harvest, it hasn't proven to be a tool that is useful beyond that. In the only season since this management plan has been in effect that projections fell short of poundage to prosecute a full season, the department closed the season a week earlier than it normally would have for the summer season. Basically, the only thing accomplished by this action, an action, I might add, the department was bound by regulation to do, was the few fishermen who were still harvesting lost a week's worth of opportunity in a high demand market. I would like to add that I applaud the department for their efforts to allow a harvest in a low effort season.

The current management regime for Dungeness, even without the current management plan, for registration area A, Southeast, is the most conservative on the west coast of North America. Most of Southeast is open for two months (June 15-August 15) in the summer and two months in the fall (October 1-November 30). By contrast, the coasts of California, Oregon and Washington seasons open by regulation on December 1<sup>st</sup> and will close September 1<sup>st</sup>. This would be the "season" part of the three S's.

The minimum size limit for Dungeness in the state of Alaska is 6.5 inches. Every other state and province on the west coast has a minimum size limit of 6.25. This would be the "size" of the three S's. Minimum size is an important aspect of the three S's, as it allows undersized male crab to be returned to the sea to breed. Having a 6.5 inch limit insures that we will have ample breeding males in the population.

"Sex" would be the third S. We only keep boys. No girls allowed.

The three S's management seems to work for Dungeness crab. The coast fisheries in the lower forty-eight have been managed this way for many decades. These fisheries, which have only recently gotten pot limits, have been vibrant producers. It is recognized that Dungeness populations fluctuate greatly from year to year. There are strong year classes, and weak year classes, probably due to environmental, predation, or climate issues. There is no biomass assessment or survey.



Here in southeast, the fishing districts that receive the most effort, both in permits and pot lifts are the very areas that consistently produce the most pounds. The conclusion I draw from this is that the three S's management is working.

Table 1.1 Harvest by district in Registration Area A (Southeast) commercial Dungeness crab fishery.

SEASON	2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11
<b>District</b>											
<b>101</b>	78,743	78,280	142,799	133,229	197,842	118,796	73,614	47,781	65,274	85,509	120,826
<b>102</b>	62,977	89,828	116,051	91,807	85,253	*	*	138,147	67,006	116,964	85,338
<b>103</b>	31,318	41,104	14,791	33,747	25,472	*	44,342	40,441	*	15,489	*
<b>104</b>	*	*	0	0	0	0	0	0	0	*	*
<b>105</b>	146,617	373,997	515,881	227,520	85,171	56,731	114,851	204,713	360,651	130,014	77,066
<b>106</b>	354,436	1,166,696	1,558,903	773,331	826,111	708,441	509,390	696,243	592,223	405,392	542,259
<b>107</b>	46,745	222,721	422,682	172,008	248,544	190,936	152,375	184,092	154,903	90,916	172,434
<b>108</b>	613,881	792,040	1,585,850	829,198	652,588	948,483	1,011,573	1,017,894	844,572	607,202	641,618
<b>109</b>	483,689	434,225	1,207,888	569,142	473,614	316,497	545,360	908,960	612,171	339,981	132,734
<b>110</b>	378,250	159,149	280,581	188,656	357,632	209,763	309,884	549,674	378,122	315,785	225,245
<b>111</b>	24,918	275,299	918,015	676,605	570,564	567,509	865,895	484,202	637,676	489,839	581,629
<b>112</b>	100,012	170,540	223,562	432,395	448,333	380,441	305,700	284,288	293,955	220,526	109,049
<b>113</b>	171,737	161,796	145,117	118,584	181,038	181,384	251,305	194,512	161,767	308,514	104,179
<b>114</b>	54,777	101,944	120,304	177,010	336,717	269,926	*	282,391	229,345	185,834	184,786
<b>115</b>	15,166	36,866	87,950	113,575	100,122	153,101	138,360	375,017	325,792	254,847	259,680
<b>Total</b>	2,565,230	4,105,697	7,340,374	4,535,807	4,589,001	4,205,480	4,503,970	5,408,355	4,731,668	3,569,697	3,245,265

\* Includes data from less than 3 permit holders, therefore confidential.

Districts 106 and 108 have been historically among the areas largest producers. They also have the most permits fished per season, as Table 1.2 shows, and the most pot lifts, shown in 1.3. Continued high production coupled with high effort, clearly shows that size, sex, and season as a management regime works well, allowing a sustainable harvest of the resource.

The current management simply adds an uncertainty to both fishermen and processors that is completely unnecessary. The department already has the authority to close the season by emergency order if they felt the resource was in trouble.

These tables were provided by the Alaska Department of Fish and Game. They show data from the years that the current regulation has been in effect. Prior to the 2000-01 season, they have data, but less reliable. I was also able to get data from the years prior to the current regulation that shows similar effort and catch numbers. Prior to the current regulation, our season was managed by size, sex, and season with no threshold. In the 14 seasons since the new regulation, despite losing area to otter predation, we have had a healthy fishery that is very economically important to our coastal communities.



Table 1.2 Permits fished by district in Registration Area A (Southeast) commercial Dungeness crab fishery.

District	SEASON												
	2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13
101	12	14	17	16	18	12	7	8	5	6	7	10	7
102	5	6	10	7	8	*	*	5	5	7	5	5	6
103	4	9	7	5	9	*	6	6	*	4	*	*	*
104	*	*	0	0	0	0	0	0	0	*	*	*	0
105	22	23	33	29	14	8	6	13	22	14	10	*	*
106	55	91	95	71	71	66	46	57	60	54	53	47	48
107	15	31	31	28	24	21	21	19	19	20	18	17	16
108	82	83	88	81	75	68	69	68	84	68	58	50	73
109	28	29	43	34	26	22	21	28	28	22	14	10	10
110	41	34	20	27	30	25	19	29	31	31	27	31	26
111	12	18	28	28	25	23	19	22	26	31	27	20	19
112	8	18	12	17	21	17	9	21	23	20	13	11	16
113	11	13	10	8	9	10	8	9	13	17	15	13	12
114	4	6	6	7	11	10	*	8	11	9	9	7	6
115	12	10	10	13	11	10	9	12	17	13	10	13	14

\* Includes data from less than 3 permit holders, therefore confidential.



Table 1.3 Pots pulled by district in Registration Area A (Southeast) commercial Dungeness crab fishery.

SEASON														
District	2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	
101	11,014	10,462	19,128	17,918	26,565	11,468	8,920	5,619	6,590	8,520	11,717	12,328	10,626	
102	7,620	10,715	15,885	14,460	10,497	*	*	14,606	11,330	12,260	10,551	7,464	7,838	
103	3,196	7,618	2,296	8,669	6,358	*	5,785	4,824	*	3,133	*	*	*	
104	*	*	0	0	0	0	0	0	0	*	*	*	0	
105	20,116	41,810	55,387	31,868	11,035	5,420	10,935	26,011	46,590	19,387	12,422	*	*	
106	28,652	141,626	175,301	111,966	106,520	85,147	61,734	104,643	104,593	68,838	82,443	73,879	70,989	
107	10,313	31,836	39,686	33,002	32,461	24,691	20,638	27,939	24,133	19,018	24,492	18,405	18,753	
108	116,880	137,686	193,164	139,696	105,626	126,055	135,559	145,248	141,029	120,915	102,572	99,543	134,195	
109	70,091	50,182	112,875	71,144	48,260	30,844	50,407	98,695	74,220	47,941	17,684	17,762	9,799	
110	46,854	28,688	27,119	22,468	42,286	24,231	27,611	56,870	52,240	45,142	31,466	35,475	39,075	
111	4,624	20,356	72,328	70,161	64,225	42,870	68,939	57,908	70,866	65,336	78,033	40,696	23,860	
112	18,980	20,548	29,149	49,200	45,866	45,934	32,288	32,995	39,409	33,293	15,829	22,308	20,292	
113	18,096	22,887	23,947	11,312	15,436	20,139	18,832	18,617	17,511	40,681	17,058	17,824	23,549	
114	10,283	8,411	9,907	15,260	33,935	26,299	*	19,963	26,917	23,734	16,613	11,686	11,424	
115	3,498	6,010	8,166	11,480	8,730	14,312	10,598	24,755	30,550	26,756	23,724	17,462	26,448	

\*Includes data from less than 3 permit holders, therefore confidential.

Proposal 61- Opposed. This plan would call for the department to conduct surveys. Current budget constraints would restrict this type of management. Makes an assumption that there is a 50% mortality in the handling of soft-shell crab. Also makes the comment that California, Oregon, Washington delay their season to reduce handling of soft-shell crab. Surveys on the coastal fisheries are really more a sampling of recovery than of soft shell condition. Crab are harvested, weighed, cooked, then the meat is picked. 23% recovery is the minimal goal. The survey is an effort by the processors to manage the season for good recovery, not by the states to minimize handling of soft crab.

Proposal 62- Opposed. This plan would have the department micro-manage by fishing district. Ultimately, this would increase effort in areas that normally might not see as much. Fishermen would be able to travel from area to area as they opened. Again, it would cost a tremendous amount of money. Harvest



limits would call for a bio-mass estimate. Something the department does not currently have. This intensive type of management is not necessary. Size, sex, and season works well enough.

Proposal 63-Opposed. No thresholds are needed. The three S's work good enough.

Proposal 64-Opposed. Not necessary. Assumes soft-shell mortality that hasn't been documented. Three S's management all that is necessary.

Proposal 65-Support. Extending the season deep into the winter months would probably not increase the effort much. A region wide season would also spread effort over a larger area in the summer months. There is NO scientific data to support a winter only season in districts 101 and 102.

Proposal 66-Oppose. Ridiculous and unrealistic. Data shows that while pot lifts have increased in recent years in Lynn Canal, average crab per lift has stayed the same. Lynn Canal is merely seeing an expected decline as the strong year class of crab has passed through.

Proposal 69- Support. I am opposed to any areas being closed to commercial fishing. A neverending sport and subsistence season allows adequate access for these users.

Proposal 70- Oppose. See reasoning for proposal 69.

Proposal 71- Oppose. See above.

Proposal 72- Oppose. Wrangell Narrows currently provides 50,000+ pounds a year for the last ten years. The ten year average for permits fished is 15. It is a viable and productive area that is closed 8 months a year to commercial fishing. There is plenty of opportunity. The population of Petersburg is not growing, it is much the same as it was 40 years ago. The only growth there has been is in charter vessels and lodges.

Proposal 73-Oppose. See above.

Proposal 74-Oppose. No area should be closed to commercial Dungeness fishing.

Proposal 75-Oppose. See above.

Proposal 76-Oppose. Juneau already has a huge area set aside for sport and personal use. The area addressed is one of the better areas of the few left in the Juneau area. This fishery is of growing importance in the Juneau area with the advent of a local processor.

Proposal 77-Oppose. See above.

Proposal 78- Oppose. See above.

Proposal 79- Oppose. Current management allows plenty of opportunity for sport and subsistence users.

This concludes my comments for this particular meeting. Thank you for the opportunity and consideration.

Max Worhatch



Submitted By  
Blain Anderson  
Submitted On  
12/29/2014 11:39:35 AM  
Affiliation  
Sound Sailing

Phone  
9078879446

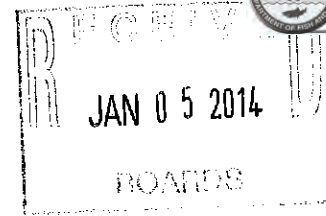
Email  
[capt.blain@soundsailing.com](mailto:capt.blain@soundsailing.com)

Address  
PO Box 6078  
Eliason Harbor  
SITKA, Alaska 99835

RE: PROPOSAL 74 - 5 AAC 32.150. Closed waters in Registration Area A. Close commercial Dungeness crab fishery in Big Bear/Baby Bear Marine Park near Sitka, as follows:  
Disallow commercial crabbing in all or most of the Big Bear/Baby Bear Marine Park bays anchorage.

This State Park is the most desirable and one of the heaviest used recreational anchorage in the Peril Strait area but has been so congested with commercial crab pots that anchoring is lately impossible during the crab season. Boats from Sitka use this bay for overnight anchoring and often enter at night, making the risk of entanglement in a commercial crab line very real. On two occasions every spot along the bay of adequate anchoring depth was occupied by crab pot buoys. This was the case in many other areas this summer as well, but Big Bear/Baby Bear is the only one on this proposal. After the commercial crab season was closed, there were still commercial crab pots in the bay that had been left employed or forgotten. I inspected two and found that both had no escape mechanism and were full of crabs.

I support reducing or eliminating commercial Dungeness crab harvest in this state park, for both safety and conservation reasons. Please leave this one area of Peril Strait open to recreational and subsistence use only.



23 December 2014

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

re: Proposal 69-5AAC 32.150. Repeal specific commercial Dungeness crab fishery in the closed waters designated as "reserved for local subsistence" in areas around Tenakee Inlet

Dear Board Members,

After 45 years as a university professor and research biologist studying the genetics of marine zooplankton, I retired from Oregon State University and moved to Tenakee Springs. Three of the faculty members in my department had been involved with the coastal stakeholders that were instrumental in setting up a series of marine reserves along the Oregon coastline. When my wife and I moved to Tenakee, we found a marine reserve already in place, attesting to the forward thinking and knowledge-based policies of ADF&G. This reserve was fulfilling its twin purposes of acting as a source of Dungeness crabs for the recreational/subsistence fishery and as a source of larvae to service the needs of the commercial Dungeness fishery. This last service is supported in two ways. First, the sports/subsistence fishery takes an insignificant number of crabs, thus there is a dense and healthy population in the Kadashan and Indian River areas. Second, both the male and female crabs in the current reserve appear on average to be significantly older and larger than outside the reserve. (I note that this relationship holds in spite of the fact that females are protected in all areas. I suspect it is related to Dungeness density and perhaps to non-human predation on the population and effects such as predator satiation.) The significance of female size is that the number of ova that can be carried by a gravid female is a function of the size of her telson. And, because crabs have motile, planktonic larval stages, adult crabs inside the present reserve produce the "seed corn" of the next generation outside of the reserve.

This reserve is therefore of value to the recreational/subsistence users, to the commercial fishery, and to the health of the Dungeness crab population itself both inside and outside the reserve. I urge the commission to continue its wise policy of promoting the long term interests of all three groups.

Charles E. King  
Professor Emeritus

Department of Zoology  
Oregon State University  
Corvallis, OR 97330  
[kingc@science.oregonstate.edu](mailto:kingc@science.oregonstate.edu)  
<http://people.oregonstate.edu/~kingc/index.htm>

P.O. Box 54  
600 E Tenakee Ave.  
Tenakee Springs, AK 99841  
(907) 736-2425



## REPRESENTATIVE CATHY MUÑOZ

January 7, 2015

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

RE: Alaska Board of Fisheries – Southeast and Yakutat Crab, Shrimp, and Miscellaneous Shellfish

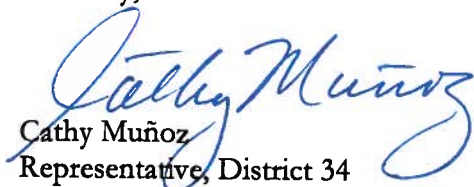
Dear Chairman Johnstone,

Thank you for the opportunity to comment on Proposal 69, 5 AAC 32.150, Closed waters in Registration Area A. I request that my comments in opposition be added to the official record on this proposal. Recently, the City of Tenakee Springs passed a resolution supporting the continued closure under 5 AAC 32.150(2) of a portion of Tenakee Inlet to commercial Dungeness crab fishing. While the proposal states that 2010 census data shows a population of only 114 residents, the census data does not include part-time residents or visitors to that area. As a part-time resident of this community, I understand how important this resource is to the area.

In the early 1980s, the commercial fishing pressure of Dungeness crab stock threatened the population in the region. The Board of Fisheries acknowledged the threat and adopted 5 AAC 32.150(2) in order to protect the Dungeness crab population. As a result there is finally enough stock for residents to catch an adequate amount for subsistence, personal, and sport use.

While I understand there is a decline in the overall abundance of the resource in Southeast, opening up these waters to commercial Dungeness crab fishing threatens this important personal and subsistence resource to the community and visitors of Tenakee Inlet.

Sincerely,

  
Cathy Muñoz  
Representative, District 34





Alaska Dept of Fish and Game  
Board of Fisheries  
PO Box 115526  
Juneau AK 99811

Tad Fujioka  
214 Shotgun Alley  
Sitka, AK 99835

January 6, 2015

Chairman Johnstone:

I have been an active personal use and subsistence harvester of shellfish in northern Southeast Alaska for over thirty years. I am not a commercial harvester of these resource, nor in anyway have a financial stake in the harvest, but instead I am typical of the great majority of shellfish gathers- ordinary folks who live here and who harvest for themselves, their family and their friends. Unlike most of them, I have served for almost a decade on the Sitka Fish & Game Advisory Committee and am thus aware of the valuable opportunity that the public has to provide the Board of Fisheries with our personal perspectives. I greatly appreciate the chance to comment on the proposed changes to shellfish regulations that the BoF is considering. Please do not mistake the relative scarcity of comments from those of us without financial ties to the resource to mean that we don't care about our opportunity. In the great majority of cases, most personal use and subsistence harvesters simply don't realize how the process works and how simple it is to provide input.

Proposal 63- Support- (with Amendment)

While many proposers seek to keep commercial crabbers out of certain areas and other proposers seek to entirely overturn the Dungeness management plan, this compromise proposal instead is an attempt to improve the plan. As sea otter have decimated crab in many formerly productive grounds, the crabbing effort has concentrated in the remaining otter-free areas. This concentrating of effort has caused commercial crabbers to work grounds that were historically ignored due to their small size, isolated location or less-than-optimal habitat. The numerous proposals to close commercial fishing in various "honey holes" that were previously not subject to much commercial harvest are simplify a consequence of this.

The 2014 harvest shows that even the limited otter-free areas can still produce a lot crab when conditions are right. However, the potential for overharvest is more severe now that the same number of crabbers are working in a smaller area and fully occupying fringe habitat. While I don't know enough about the any of the specific proposed closed areas to have a fully informed opinion, as a general idea, rather than further concentrating the fleet (which will only increase pressure on the remaining areas), reducing effort area-wide in years when it is needed seems to be a better strategy.

Perhaps the proposal could be further improved by allowing the department to continue to adjust their 14 day initial in-season estimate rather than being stuck with the season lengths determined by this "first look." Adequate notice would of course need to be provided for Emergency closures and extensions.



#### Proposal 65- Opposed

This proposal makes several changes. Deleting 5 AAC 32.110 (2) would reopen the Sitka area to commercial harvest during the summer. Additionally, the amendment to 33.110 (3) would further increase harvest during the winter season. The local Dungeness stocks in the areas closest to Sitka are already heavily predated upon by sea otter. As a subsistence fisherman, it is quite difficult to catch a crab for dinner on any regular basis unless you are willing to pay a large gas bill to make a trip to distant waters-in which case it becomes more of a sport fishing trip than a subsistence fishery. For this reason the commercial season in the Sitka Sound Special Use Area should not be expanded.

I have no reason to be opposed to the expansion of the District 2 fishery or for beginning the season at 8 AM rather than noon.

#### Proposal 69- Opposed

For the reasons mentioned in discussion of Proposal 65, I oppose extension of the commercial Dungeness season in the Sitka Sound Special Use Area. I lack the information needed to have an informed opinion regarding the other two areas that this proposal addresses.

#### Proposal 83- Support

The two week closure of the personal use tanner crab fishery is not needed. As the proposer explains, the PU red king crab fishery generally doesn't open on July 1 anymore, so there is no need to prevent scouting in the two weeks prior. Even in the event that the king crab season does open on July 1 (which would presumably occur once king crab stocks return to their previous levels of abundance), there is no need for this two week closure. Scouting is unnecessary during high/moderate levels of crab abundance. Additionally, even if somebody wanted to set their king crab pot early to increase the likelihood of having a king crab in the pot on July 1, this doesn't really accomplish all that much for them. Again, red king crab season won't open on July 1 until the population recovers. In the past when the crab levels were high to moderate, it was easy enough to get your king crab after a soak of just a few hours. Setting your pot out days in advance will gain you little in this situation.

#### Proposal 92- Oppose

Blue king crab are scarce enough in the local waters that at least in the Personal Use and Subsistence fisheries, they are not a targeted species, but are bycatch during the king crab fishery. While the proposer implies that there is no biological difference between the species, based on the size-distribution of the ones that I have caught, the 6-1/2" limit seems quite appropriate. Blue king crab in this area don't get as big as reds. Six-and-one-half inches for a blue is at least as big as seven inches is for a red, relative to their maximum size. In addition to my personal observations, Doyne W. Kessler's well-respected "*Alaska's Saltwater Fishes and Other Sea Life*" indicates that while red king crab achieve a maximum carapace width of 11", blues only grow to as large as 10". Given this difference in maximum size, it fully makes sense to have a smaller legal size for blue king crab than for reds.

Thank you, Tad Fujioka



Submitted By  
chad poppe  
Submitted On  
12/30/2014 12:20:32 PM  
Affiliation

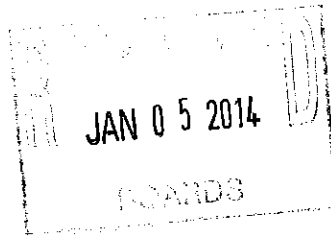
I am writing in opposition of Proposals 76 and 77.

I am a Juneau resident who participates in the SE Commercial Dungeness Crab Fishery. I am in opposition to these proposals because these residents have the entire year to catch crab outside of the short commercial season. If commercial fisherman are able to make a living catching crab, then residents of this area can easily catch enough crab for their personal use. If they don't want to fish around commercial boats then there is plenty of opportunity all around the Juneau area that has a large abundance of crab and is closed to commercial fishing. Example: Gastineau Channel, North Douglas, Auke Bay, Eagle Beach, etc. Personal use fisherman should not have exclusive rights to all waters in the Juneau area.



24 December 2014

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



Dear Board members:

I am writing to give my opinion on the Proposal 69-5AAC 32.150. Registration Area A, which proposes to repeal specific commercial Dungeness crab fishery in the closed waters designated as "reserved for local subsistence" in areas around Tenakee Inlet, Sitka Sound & Port Althrop.

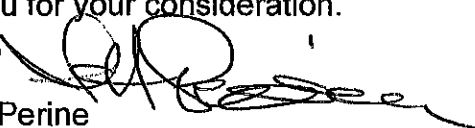
I live in Tenakee Springs and can't imagine that the commercial fishermen need access to our local waters when they have the Entire coastline of Alaska at their disposal!!! We harvest for our winter storehouse and we share among ourselves if we catch more than we can personally use or, of course throw it back. The two areas, near our village, were set aside for subsistence use.

After a couple of years, we literally could see the difference in abundance when the commercial Dungeness crab fishery was no longer allowed in these two small areas. The commercial fishery continued to have full access to the entire remainder of Tenakee Inlet. Tenakee Inlet is about 45 miles long and seems to attract and support the commercial fisheries.

It is enough that they come to our town and use it as there own little play ground and leave garbage and beer cans for us to ship to Juneau, without their stripping our subsistence area, too.

I urge the Board to reject the Proposal 69-5AAC 32.150 changes and to not amend 5 AAC 32.150(2) "...facility at 135° 18.18' W longitude and north of Corner Bay Point." Do not delete 32.150(3) and 32.150(10). Leave the area and the regulations as they are now and reaffirm the two subsistence areas in Tenakee Inlet, adjacent to the village of Tenakee Springs.

Thank you for your consideration.  
sincerely,

  
Linda H. Perine  
606 E. Tenakee Trail  
Tenakee Springs, AK 99842



IN REPLY REFER TO:

## United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
1011 East Tudor Road  
Anchorage, Alaska 99503-6199



22 DEC 2014

FWS/OSM 14141.GP

Mr. Karl Johnstone, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 25526  
Juneau, Alaska 99802-5526

Dear Chairman Johnstone:

The Alaska Board of Fisheries will deliberate 2014/2015 regulatory proposals that address Southeast and Yakutat crab, shrimp, commercial, sport, and subsistence shellfish fisheries beginning January 21, 2015. We understand the Board will be considering approximately 56 proposals at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and does not believe that adoption of any of these proposals will have an adverse impact on Federal subsistence users and fisheries in this area. We may wish to comment on these proposals if issues arise during the meeting which may have an adverse impact on Federal subsistence users and fisheries.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Eugene R. Peltola Jr.  
Assistant Regional Director  
Office of Subsistence Management



Chairman Johnstone

2

cc: Sam Cotton, Acting Commissioner, Alaska Department of Fish and Game  
Tim Towarak, Chair, Federal Subsistence Board  
Chuck Ardizzone, Deputy Assistant Regional Director  
Office of Subsistence Management  
Stewart Cogswell, Fisheries Chief, Office of Subsistence Management  
Jeff Regnart, Division Director of Commercial Fish  
Alaska Department of Fish and Game, Anchorage  
Hazel Nelson, Division Director of Subsistence  
Alaska Department of Fish and Game, Anchorage  
Charles Swanton, Alaska Department of Fish and Game, Juneau  
Glenn Haight, Executive Director II, Birds, Fish and Game  
Alaska Department of Fish and Game, Juneau  
Jennifer Yuhas, Federal Subsistence Liaison Team Leader  
Alaska Department of Fish and Game, Fairbanks  
Drew Crawford, Fishery Biologist, Alaska Department of Fish and Game Anchorage  
Interagency Staff Committee  
Administrative Record

---



Submitted By  
Joan and Larry O'Keefe  
Submitted On  
1/7/2015 9:27:06 PM  
Affiliation  
Horse Island land owner

Re: Support of Proposal #76

Please close the channel between Horse & Colt Island and mainland Admiralty from commercial crabbing in favor of a personal use fishery. We've had property on Horse Island since 1986. Some years the commercial crabbers hit the area hard, seemingly wiping out--or at least drastically reducing-- the crab stock available for personal use. We've also had personal use crab pots mysteriously disappear.

In closing, we urge your support of Proposal #76.

Thank you for this opportunity to provide comment.



Proposal 71:

I am in opposition to this proposal!!!!

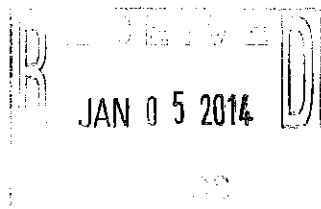
Whales pass already has a closed area where locals are allowed exclusive fishing in the summer. The whale pass area particularly the area that is proposed to be closed is a very productive crab ground. I have been fishing this area for the last 4 years and have not seen a decrease in biomass but an increase. Also I have seen very little effort by the local community to fish these grounds. Even though there is more than enough crab throughout the commercial season for a sport, personal use, or subsistence fisherman to feed him or herself and their family from the allowable pot limit.

I believe that the issue is more a dislike for crabbers in general than a lack of resource.

Besides my personal gain from this area I oppose this proposal because if we close this area then another four or five fishermen are going to be forced to fish where there is already other fishermen working, putting undue stress on other crab grounds as well as other communities. Our crab grounds are already shrinking from the otter invasion. To continue to close productive grounds will only have a negative impact on Dungeness and local communities that have not already gotten closures granted.

Thank you for considering my thoughts

Gary Adkison Jr







Members of the Alaska Board of Fish:

I am writing this letter in **OPPOSITION to PROPOSAL 71**. Whale Pass already has an area closed to commercial crabbing for Dungeness crab during the summer months, and now they want to extend the area to cover an area that has been and is currently used by commercial fishermen for over 20 years.

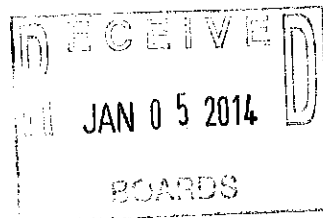
If there is a problem with crab stocks, then it should be closed to non resident sportfishermen as well as commercial fishermen. If it is not a crab stock problem, then it is an allocation issue, and we have to keep our commercial fishermen from losing area to non resident sport fishermen, as this problem is going to get worse as more and more people move into these areas. We need to set a precedent that our local people's livelihood is more important.

The proposal doesn't even state what the issue is and why it needs to be addressed. It should be opposed on that fact alone. The commercial fishermen in the area should have the right to fish the areas they have for over the past 20 years.

I urge the Board of Fish to **Reject Proposal 71**.

Respectfully,

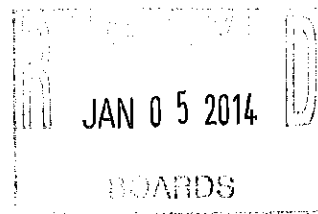
*Doug Rhodes*  
Doug Rhodes  
Craig, Alaska





24 December 2014

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



Dear Board members:

I am commenting on the Proposal 69-5AAC 32.150. Closed waters in registration Area A, which proposes to repeal specific commercial Dungeness crab fishery in the closed waters designated as "reserved for local subsistence" in areas around Tenakee Inlet, Sitka Sound & Port Althrop.

I live in Tenakee Springs and recall when the two areas, near our village, were set aside for subsistence use. The commercial Dungeness crab fishery was no longer allowed in these two small areas, but the commercial fishery continued to have full access to the entire remainder of Tenakee Inlet. Tenakee Inlet is about 45 miles long with numerous streams & seems to support & sustain a commercial fishery just fine. Some years there are more commercial crab fishermen than others & this probably reflects fluctuations in price more than abundance.

When the subsistence enclave was established, the local subsistence as well as recreational Dungeness crab fishery was hugely improved. Within a year or two, for the first time, in anyone's memory, nearly all the crab in these two areas were allowed to grow beyond the legal harvest size. And the areas were not saturated with pots, floats, fishing lines and commercial boats.

In the early 1980's, when the subsistence enclaves were established throughout the State, resource managers were probably not thinking about the benefits of "nursery areas." But, by accident, these subsistence areas turned out to be nursery areas; benefiting the surrounding waters being heavily harvested by commercial fisheries. These "nursery areas" are now recognized as extremely beneficial to surrounding areas, especially when subject to high harvest rates.

Throughout SE Alaska, there is only a very small percentage of the area reserved for exclusive subsistence/recreational use. I urge the Board to reject the Proposal 69-5AAC 32.150 changes and do not amend 5 AAC 32.150(2) "...facility at 135° 18.18' W longitude and north of Corner Bay Point." Do not delete 32.150(3) and 32.150(10). Leave the area and the regulations as they are now and reaffirm the two subsistence areas in Tenakee Inlet, adjacent to the village of Tenakee Springs.

Thank you for your consideration; sincerely,

S. A. Moberly  
Box 599  
Tenakee Springs, AK 99842



Mr. Chair & Board members

I am the sponsor of proposal 99 for standardizing of shrimp gear in region area A. It is time the industry realizes the need for standardization and reduction of shrimp gear. Although previously we have reduced the size and number over the objection of some in the industry, it is not enough. The shrimp season is open for five months, but all but a few areas are closed within a week to a month. This is not good for the resource. We have too many permits and too much gear to maintain a five month season.

By reducing the limits of small pots from 140 to 100 for every 4 boats, you reduce the effort by 160 pots or 1 boat. This should also apply for large pot reducing limits from 100 pots to 75 pots. This will help conserve the resource by reducing the effort, providing longer openings, and less gear conflict. You would know where the gear is. Instead of a string of 20 pots, you would have strings of 5 small pots or 3 large pots.

The proposal does not keep anyone from participating in the fishery nor cost anyone money to participate for they already have the gear. By reducing pot limits you reduce effort without having to buy back permits. In closing, other fisheries (gillnet, seine, crab, hand troll, power troll) have standards in place. It is time to put standards on the shrimp fishing in the fishery.

Respectfully,

Don Westlund



Dec 30 2014

ADFG Board

RE: Proposal 71

I am OPPOSED to this proposal




WHY:

I have commercially fished Dungeness crab in the Whale Pass (Whale Pass has about 40 + - full time Residents) area for over 15 years, the stocks appear to be ok (sometimes there up & sometimes there down) see attached photo from July 2014. The real problem I have with proposal 71 is in the summer season there are lots of Non Resident SPORT users in Whale Pass (they have a closed area marked in "red hash marks" for fishing) "see attached chartlet" then in the fall season you are lucky to see ½ dozen Resident personal use pots In fact out of 15+ years its only been the last 3 fall seasons that I have seen personal use pots at all!! ( and they are normally within 2000 ft of the airplane float) What I see here is a push from NON RESIDENT SPORT (through the Whale Pass Community Association) to take away fishing area from a RESIDENT commercial fisherman.

I Used to live & work in Whale Pass in the 70ies during the logging camp days there were no dungeness crab there at that time! Some folks find that hard to believe but its true.

Thank you for your consideration on this matter

Sincerely

  
Ron Opheim  
Commercial fisherman  
Po box 2118  
Wrangell, AK 99929  
907-874-2245  
Suijuris1@gci.net



PC 55  
2 of 4

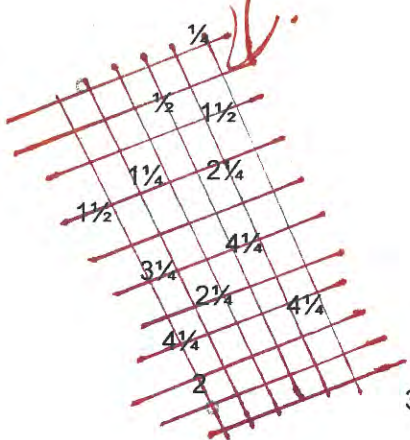
J 1 14





Proposed North  
Entrance Closure  
Line, ADFG Markers

Closed in Summer  
Season



crab

2  
4  
crab

NO CRAB

NO  
crab

NO  
crab

\* crab

# THORNE

# WHALE PASSAGE

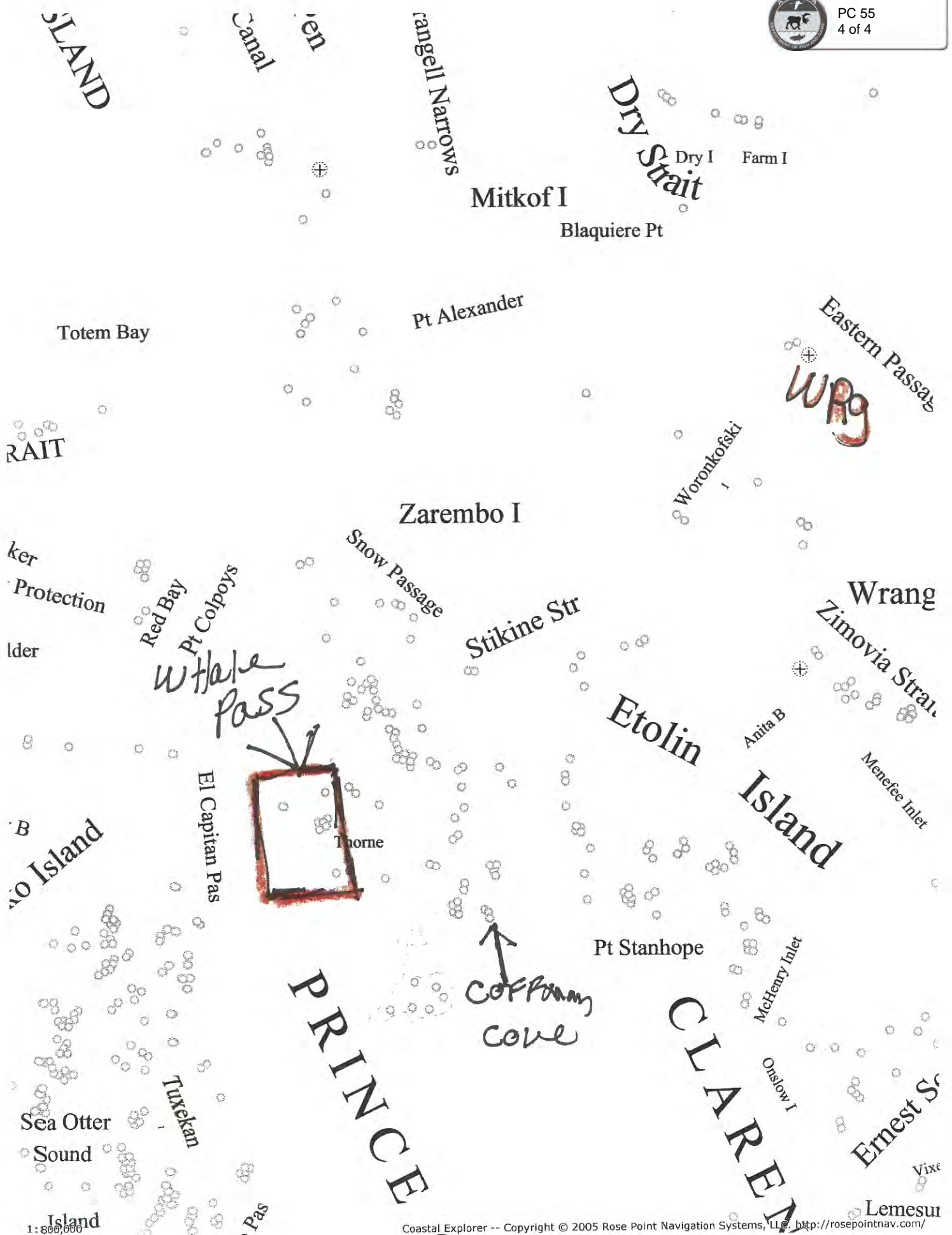
Proposed  
closure  
Line



NO  
crab

Rocky

NO  
crab  
Rocky



1:800,000

