On-Time Public Comment List
Southeast and Yakutat Finfish
February 23–March 3, 2015

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February 8, 2015

Board of Fisheries

February 23 – March 3, 2015

Dear Vice-Chair Kluberton and Members of the Board of Fisheries;

I'm Max Worhatch and I am a fisherman. I live in Petersburg. I fish commercially for salmon, crab, herring, and halibut, all in the Southeast region. I also sport fish and hunt. I am currently the President of the United Southeast Alaska Gillnetters. I also serve on the Petersburg Advisory Committee.

My comments on the following proposals today are on behalf of myself and myself alone.

Proposal 155- OPPOSED I feel that our current sport regulations are adequate to meet the needs of participants.

Proposal 157- OPPOSED 28 inches has been the standard for a long time. If release mortality is an issue, then lowering the minimum size would only work if 100% retention were implemented as well.

Proposal 158- OPPOSED Current regulations are acceptable and work well for all.

Proposal 159- SUPPORT This proposal addresses a growing sector of users that will only get larger. Having a generous annual limit will allow nonresident fishermen to enjoy the resource, while protecting fish stocks in high use areas.

Proposal 160- SUPPORT See 159.

Proposal 174- OPPOSE While I oppose this proposal, I am in agreement with the proposer that the spring hatchery access troll fisheries occurring in corridors that are natural migration routes for king salmon that are bound for local trans-boundary rivers without a TAC makes little sense. These fisheries are to access Alaska hatchery king salmon. A 20% Alaska hatchery component is considered very good. That means 80% of the fish caught in what is considered a very good area are either wild or of non-Alaskan hatchery. In years of low abundance, sport and gillnet fisheries are curtailed, and rightfully so, while hatchery access fisheries are continued.

Proposal 175- OPPOSE It is my feeling in working through the JRPT and the hatcheries, that the system we have in place is working good enough.

Proposal 176- OPPOSE For the same reasons as above.

Proposal 183- SUPPORT This is a joint proposal agreed upon by USAG and SEAS to address opportunity needs for our respective fleets.

Proposal 186- SUPPORT This is a joint proposal agreed upon by USAG and SEAS to address opportunity needs for our respective fleets.

Proposal 187- SUPPORT This proposal would add gillnet to the rotation in the Southeast Cove Terminal Harvest Management Plan. Should this become a rotational fishery, it is important that all gear groups have some access when deserved.

Proposal 188- OPPOSE 187 is a better plan as it includes all user groups.

Proposal 190- Support This joint proposal allows the seine fleet to utilize enhanced fish that would otherwise be taken as cost recovery, much more than needed by DIPAC. While there has been incidental sockeye, a large percentage of these fish have been enhanced. This fishery gives the seine fleet opportunity to harvest DIPAC chum in an effort to get into their enhanced allocation range.

Proposal 191- OPPOSE

Proposal 207- SUPPORT This proposal if adopted would allow the gillnet fleet to access pink salmon in years of high abundance in an area that is currently closed to them during the month of August. This area is very small, and adjacent to area currently used by the gillnet fleet on a weekly basis. While slightly complicated, this is the result of the net groups striving to find common ground in finding solutions to concerns expressed by their fleets.

Proposal 208- OPPOSE The proposer refers to this as a conservation issue as well as a fairness issue. He does fail to mention while there are sport restrictions, there have been no closures for that fishery, and this fishery harvests the bulk of treaty fish, even with no allowable catch. He also fails to mention that the commercial troll fleet prosecutes a hatchery access fishery for king salmon in district 8, even in years of no allowable catch. He also fails to mention that on an annual basis there is a hatchery access fishery prosecuted in natural corridors for both the Stikine and Taku rivers. Hatchery access fisheries target king salmon of Alaska hatchery origin. If an area has a 20% catch component of Ak hatchery, it is considered very successful. Many of the areas open for hatchery access troll do not achieve this. There is undoubtedly wild fish from our local trans-boundary rivers taken. Data shows the vast majority of king salmon taken by the gillnet fleet in district 8 are enhanced. Most gillnet fishing in district 8 these weeks occurs in areas where there is very few Stikine king salmon taken, but a high percentage of enhanced fish are. In the prosecution of the sockeye fishery in district 8, it is very normal that king salmon are harvested while targeting sockeye. Management is cognizant of effort and can adjust area and time to meet these concerns.

Proposal 209- SUPPORT Some in the gillnet fleet would like to become more efficient in their ability to harvest pink salmon. In high abundance years, it would be nice if the fleet could capitalized on solid pink returns in a manner that is acceptable to management and industry. Historically, the gillnet fleet is lagging, especially in high abundance years, in pink catch. This could provide an alternative and move boats to pink areas, spreading the fleet out.

Proposal 210- SUPPORT I support anything that will reduce my costs.

Proposal 226- OPPOSE I support current time and area only for this experimental fishery. Wild stock interception in this mixed stock fishery is unknown and could have an effect on net fisheries that are currently managed for those wild stocks. There is anecdotal evidence of a high catch rate of immature king salmon in this fishery that could result in high release mortality. There are projects in the works that will allow for chum trolling opportunity in the near future.

Proposal 227- OPPOSE See proposal 226 comments.

Proposal 228- OPPOSE There is currently an option for a ten day closure. Most years we see some type of August closure. Coho returns the last two years have been strong. Local systems region wide had very good returns, allowing for plenty of fish for subsistence, personal use and sport fishing interests.

Proposal 229- OPPOSE- I would reference my comments for 226. I cannot support an increase of time or area in this highly experimental fishery with so many unknown consequences.

Proposal 231- OPPOSE

This concludes my written testimony for these proposals. I appreciate the opportunity to comment and your consideration. See you in Sitka.

Sincerely,

Max Worhatch

253.279.0707

Hello,

I Jay Miller support 176,226, and 229 proposals. The reason why, is I fish with my young family on the inside waters. These inside fisheries being successful is one of the only ways my family can make power trolling possible. I support 176 so we can make the hatcheries accountable for the 3% fish tax we pay for all gear groups.

Respectfully submitted,

Jay Miller

February 9, 2015

Board of Fish
A.D.F.G.
Juneau, AK

Support of 223

I am writing in support of 223 because:

-There is no biological reason to not approve this proposal.
-This proposal will provide an increase in access opportunity to the S.E Troller Fleet.
-The only negative in a reallocation to 60/40 will be to boats that choose to leave the fishery after the 1st opener to pursue other fisheries.

Here is my reasoning:
-By the 2nd king opener, king salmon have moved into more locations accessible for fleet access.
-The back loading of the 2nd opener by 10% more kings will be accompanied by an increase landing of larger, more profitable coho.
-More fish per boat deliveries will result in an increase in per unit efficiency which equals more profit for the processor.
-This increase in deliveries and processor efficiency will result in an increase in tax revenues for the State of Alaska.

In closing I do not believe that the overall welfare of the S.E.Alaska troll fleet should be managed to accommodate a few boats who choose to leave the fishery after the 1st. opener.

With many thanks, Fred Sears

Experience:
-Founding secretary; president and board member from 1973- Commercial Fisherman's Organization of Morro Bay.

Founding secretary and director of PCFFA; (executive director – Zeke Grader.)
-Three time PCFFA Salmon Strategy Team Delegate to the PFMC.
-Founder and lead to mandate Army Corp of Engineers dredging of the Morro Bay harbor entrance. (Successfully introduced by our congressman Leon Panetta)
-First Calif. Delegate to the Board of SPC.
-Various memberships in ALFA, ATA and CTA.
-Trolled and commercial fisherman since 1970 to present.

Recommendations to the Alaska Board of Fisheries from the Joint Southeast Regional Planning Team

Since the Southeast Alaska Area Enhanced Salmon Allocation Plan (Allocation Plan) was adopted by the Alaska Board of Fisheries (Board), the Joint Southeast Regional Planning Team (Joint RPT) has taken on the responsibility of making recommendations to the Board concerning proposals that affect the allocation of enhanced salmon, as well as submitting Board proposals that the Joint RPT believe would fairly affect the allocation of enhanced salmon. The last two Board cycles, recommendations came in the form of an "Industry Consensus" letter. These letters were a product of industry representatives meeting in conjunction with Joint RPT meetings, to negotiate consensus positions on published Board proposals. These letters were adopted by the Joint RPT and submitted as recommendations to the Commissioner of ADF&G and the Board.

For the 2008/2009 Board cycle, the letter contained several recommendations on hatchery production and harvest management, as well as recommendations on eight Board proposals.

For the 2011/2012 Board cycle, the letter contained recommendations on eight Board proposals as well as support for the USAG and SEAS agreement which withdrew 12 Board proposals.

This Board cycle, gear group representatives negotiated compromises prior to the Board proposal submission deadline, resulting in far fewer proposals being submitted by the gear group organizations. As a consequence, an industry meeting was not held this year after the publication of Board proposals. The following Joint RPT recommendations support the gear group agreement as well as contain recommendations on other proposals that affect the allocation of enhanced salmon.

Proposal 175– Oppose

The Joint RPT opposes proposal 175, which would recommend the Board establish a task force to review the entire Allocation Plan. The author of this proposal does not seem to understand that there are ongoing processes to address changes to fisheries and production needs. The Joint RPT meets twice a year to review hatchery permit requests, review the status of the allocation plan, and to make recommendations to the Commissioner of ADF&G, the Board, and to hatchery producers. The Joint RPT has evaluated reconvening a task force to review the Allocation Plan several times, including as recently as the fall of 2014. In 2011, a full day workshop was devoted to this subject. Substantial efforts have been made to work towards the allocation percentages established in the Allocation Plan, including new production and additional opportunities. All involved parties have consistently used the Allocation Plan and its guidelines to focus debates and reduce user conflict when considering production and terminal management decisions. In this sense, the plan is working. The Joint RPT believes a "better" plan, reached by a consensus, is currently unlikely and therefore not a productive use of time and resources.

Proposal 176– Oppose

The Joint RPT opposes proposal 176, which would require NSRAA and DIPAC to have a separate allocation plan for harvests of the salmon they produce, with specific goals to reach specified allocation percentages, and annual modifications.

The Joint RPT does not support 176 because: 1) a substantial portion of hatchery-produced salmon is harvested in traditional common property fisheries. Hatchery associations do not control these fisheries; therefore it is unrealistic to meet allocation goals through controlling harvests. Production levels and location of release sites is a major factor affecting gear group harvests levels by species. Production decisions involve many factors besides allocation and require long term planning and commitments. 2) One of the strengths of the current plan is that allocation imbalances can be addressed region wide, providing many more options for trying to address them. If all of southeast production and fisheries can't be considered for meeting the guidelines of the Allocation Plan, it would be even more difficult, more impracticable, and more expensive to try to meet allocation percentages. 3) SSRAA should not be left out of a plan. SSRAA does not have its own internal allocation plan. It looks at the region-wide allocation percentages when making its decisions, and tries to do its part in helping to meet the region-wide percentages. If SSRAA had to look at a SSRAA-only plan, it would have to reconsider some of its current production and special harvest area (SHA) management.

Proposals 177,178,179,180, 181– Support

The Joint RPT supports the adoption of proposals 177,178,179,180, and 181. These proposals all put in regulation what is currently being successfully done under emergency order. None of these proposals, if adopted, will have any significant effect on wildstocks or allocation of enhanced stocks.

Proposal 183– Support, Proposal 182– Withdraw

The Joint RPT supports proposal 183, and therefore withdraws proposal 182. Proposal 183 would allow for a different time formula from the one in regulation and from the one that has been in place the last six years for the Deep Inlet SHA.

In the previous two Board meetings, the Joint RPT has recommended changes in the net rotation time formulas at Deep Inlet (and Anita Bay). These changes have been recommended in order to address the gillnet fleet being above its allocation percentage and the seine fleet being below. As part of an agreement between USAG and SEAS this proposal would allow a different time formula to be used. The Joint RPT supports the compromise efforts of USAG and SEAS. The Joint RPT supports experimenting with a plan that would require changes in the formula based on the previous year's effect on the allocation percentages, and designing a schedule that is related to the different inseason opportunity needs of the two fleets. The Joint RPT agrees that this new approach should be revisited in three years.

Proposal 184– Support

The Joint RPT supports proposal 184, which would allow trolling in Kendrik Bay. Although not likely to be substantial, if adopted, this regulation would provide additional enhanced salmon opportunities to the troll fleet, the gear group most below their allocation percentage.

Proposal 186– Support, Proposal 185– Withdraw

Joint RPT supports proposal 186, and therefore withdraws proposal 185. Proposal 186 would allow for a different time formula from the one in regulation and from the one that has been in place the last six years in the Anita Bay SHA. The regulatory change would be in place for three years.

The reasons for Joint RPT support of proposal 186 are the same as comments made to proposal 183.

Proposal 187– Support, Proposal 188– No Action

The Joint RPT supports proposal 187, which would allow commercial drift gillnet gear in the Southeast Cove SHA. Passage of this regulatory change would require no action on proposal 188.

This proposal is part of the USAG/SEAS agreement. The Joint RPT supports the compromises necessary to make an agreement. This change in the regulation may shift some potential harvest between the seine fleet and the gillnet fleet, but it is not intended to reduce the potential harvest by the troll fleet. If and when commercial opportunities are allowed in Southeast Cove, the gillnet fleet may have some opportunity.

Proposal 190– Support, Proposal 191– No Action

The Joint RPT supports proposal 190, which requires some sockeye salmon harvested in Amalga Harbor SHA during seine chum salmon fisheries to be counted as part of a wild stock sockeye salmon cap in Northern Chatham Strait seine management. Proposal 190 is part of the USAG/SEAS agreement. This proposed regulation change allows for a seine harvest of hatchery fish in Amalga Harbor while addressing wild stock and sockeye allocation concerns. Seine harvest in Amalga Harbor SHA should help the seine fleet get closer to its allocation percentage in some years. This regulatory change would sunset following the 2017 season. Passage of proposal 190 would require no action on proposal 191.

Proposals 193, 199, 200– Oppose

The Joint RPT is opposed to proposals, 193,199, and 200. These regulatory changes, if adopted, would restrict or eliminate seine harvests in the Hidden Falls SHA.

Proposal 193 would limit opportunities to harvest hatchery fish at Hidden Falls to a maximum of one day a week. This would decrease the quality and the value of salmon caught at Hidden Falls. The chum and Chinook salmon would deteriorate during the lengthy time between harvests.

Proposals 199 and 200 would stop salmon seining at the Hidden Falls SHA for 5 years or forever. The result would be millions of hatchery-produced salmon being wasted.

Proposal 225– Support, Proposals 226 & 227– No Action

The Joint RPT supports proposal 225 and recommends a sunset date be amended to December 31, 2017. Passage of proposal 225 would require no action on proposals 226 and 227.

The Joint RPT supports this "experimental" fishery because it could provide the troll fleet with additional opportunities to harvest hatchery chum salmon without significant impacts on wild stocks. The Joint RPT believes an additional three years of data will help draw reliable conclusions about the efficiency of this fishery.

February 9, 2015

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

Board Support:

The Joint Southeast Regional Planning Team (Joint RPT) would like to withdraw two proposals that they submitted to address the allocation of hatchery-produced salmon. The Joint RPT submitted similar proposals the past two Board cycles. After the Joint RPT agreed to submit these proposals again this cycle, USAG and SEAS agreed to submit similar proposals to address the same issue. The Joint RPT weighted the two options and chose to support the net gear agreement. The results are as follows:

- The Joint RPT would like to **WITHDRAW Proposal 182** due to support for similar proposal 183.
- The Joint RPT would like to **WITHDRAW Proposal 185** due to support for similar proposal 186.

Thank you!

Flip Pryor
Southeast Regional Planning Team, Chair

February 9, 2015

SEAS – PO Box 23081
Juneau, AK 99802
907-463-5080

Board of Fisheries

February 23 – March 3, 2015
Sitka, Alaska

Dear Vice Chairman Kluberton and Board of Fisheries Members:

Southeast Alaska Seiners (SEAS) submit these comments on proposals you will be considering at the upcoming meeting concerning fisheries in southeast Alaska. SEAS is a 501 (c)(6) not for profit and represents the interests of seine fishermen, tender men, crew, and families associated with salmon seine fisheries throughout southeast Alaska. SEAS members participate in salmon seine fisheries from Ketchikan, Petersburg, Hoonah, Kake, Hydaburg, Craig, Klawock, Wrangell, Sitka and Juneau. Approximately 75% of the 300 boat fleet has had membership in SEAS members, with around 50% being consistent annual dues paying members.

Of these, approximately 30% of the Southeast seine fleet are SEALASKA members or married to a SEALASKA member. In other words SEAS represents 30% Native Alaskan fishermen and 70% non-Native Alaskan fishermen. These members hail from Ketchikan, Juneau, Kake, Hoonah, Sitka, Hydaburg, Craig and Klawock. There are also SEALASKA shareholders who live in Seattle, Stanwood, Bellingham, Mercer Island and Lake Forest Park. A few of our SEALASKA members will be here testifying but the vast majority are preparing for herring season, crabbing or doing vessel maintenance. SEAS looks forward to working with the board this year on proposals pertaining to our longstanding, sustainable, historical fishery here in Southeast Alaska.

Re: Opposition to Proposals 173, 175, 176, 188, 191, 193,194, 195, 196, 197,199 200, 202, 203, & 204; Support for Proposal 146, 183, 186, 187, 190, 198, 207

Oppose Proposal 193 – Prohibit commercial seine fishing in ADF&G district 12-sub 15 and district 14-sub. 21 & 23, **Oppose Proposal 199 –** prohibit seine fishing within Angoon Possessory Boundary**, and Oppose Proposal 200 –** close waters to seine fishing with Admiralty Monument Proclamation. The following comments apply to these three proposals 193, 199, & 200:

These proposals seek to limit or eliminate the purse seine fishery in most of District 12 to no more than 15 hours in any 7 day period in the best case and completely closing parts or all of District 12, Sub-district 15 and District 14, Sub-districts 21 and 23 asserting that the purse seine fishery in these areas interferes with the ability

of the residents of Angoon to meet their subsistence needs for salmon. It further supposes that broad time and area restrictions are necessary to "protect and maintain subsistence salmon stocks and fisheries in the Chatham Straits Area."

SEAS opposes these proposals in their entirety, Proposal 193, 199 and 200. The harvest rate on Kanalku sockeye by the purse seine fleet was 8% on the largest return of pink salmon and the most productive purse seine fishery in the history of the region, going back to 1878. Any changes to fishing time and area will result in hardship and loss of economic opportunity not only for the seine fleet but recall that 30% of these foregone opportunities will accrue to Tlingit and Haida brethren of the Kootznoowoo Corp and Angoon people: notably the traditional and historical fishing grounds of the Kake and Hoonah people, while being fished by not only Kake and Hoonah fishermen but also fishermen from Hydaburg, Klawock, Craig as well as SEALASKA members from Juneau, Petersburg, Sitka and Ketchikan. So any adjustments, be they slight, would hamper the ability of Native Alaskans to conduct their century old occupations of commercial purse seining.

Since the mid-1980's there has been a massive resurgence of pink salmon through the Icy Strait and Chatham Strait corridor, producing the largest 3 salmon runs in history as well as the 5th , 6th , 8th , 9th and 10th largest. Without this incredibly important corridor to conduct mixed stock fisheries on years of high pink salmon abundance, the balance in Southeast Alaska's purse seine fishery fails. On a good northend run about a third to half of the Klawock and Craig Tlingit fishermen and the Hydaburg Haida fishermen come to Chatham Strait to fish. This fact along with the Chatham fishery's existence helps to anchor a lot of the boats so as to maintain a reasonable balance of fishermen in the other Native traditional and historical fishing grounds as well. Not only is this an unwarranted attack on the traditional Kake, Hoonah and Angoon (ironically) fishing grounds, it would have reverberations throughout the other Native communities of Southeast Alaska.

The Chatham purse seine fishery has been managed very conservatively in June and throughout the first 2-3 weeks of July to limit the impact on subsistence sockeye stocks in upper Chatham Straits; recent Genetic Stock Identification (GSI) research by the department shows that the purse seine fishery has very limited impact on subsistence sockeye stocks, specifically Kanalku Lake sockeye. The proposed restrictions would interfere dramatically with the commercial fishery harvest with substantial economic impact. In short, a problem is asserted but not demonstrated that severely restricting the seine fishery would substantially change subsistence stocks or fisheries. Subsistence harvest and opportunity are being met and will be addressed herein.

1) <u>The purse seine fishery in upper Chatham Straits is managed to limit exploitation of subsistence sockeye stocks</u>

The fishery is conducted largely after the subsistence stocks have passed through the commercial fishery. The following graph (Fig.16) demonstrates this point showing that the average opening date for the purse seine fishery in the statistical area 112-16, (*which is 45 miles distant from Kanalku*) falls on July 19, at which point 80% of the subsistence harvest of Kanalku is completed. The aveargе opening for 112-17, (*which is closer to Kanalku*), falls on July 28, at which point 92% of the subsistence harvest has occurred.

ADF&G stock status report 2014: "In Southeast Alaska, sockeye salmon production is the result of run strength to many small stocks and a few very large stocks. To prevent over fishing of individual stocks, the majority of the purse seine effort is directed into mixed stock areas, held to conservative levels, and spread over as many stocks as possible. Van Alen (2000) maintained that this style of management "effectively moderates exploitation rates and reduces the risk of overexploiting individual runs, or temporal segments of runs, as occurred historically."

Figure 16 from the ADF&G stock assessment report clearly shows the relationship between the first seine openings in 112-16 and 112-17 and 80% and 92% of subsistence harvest completed at Kanalku

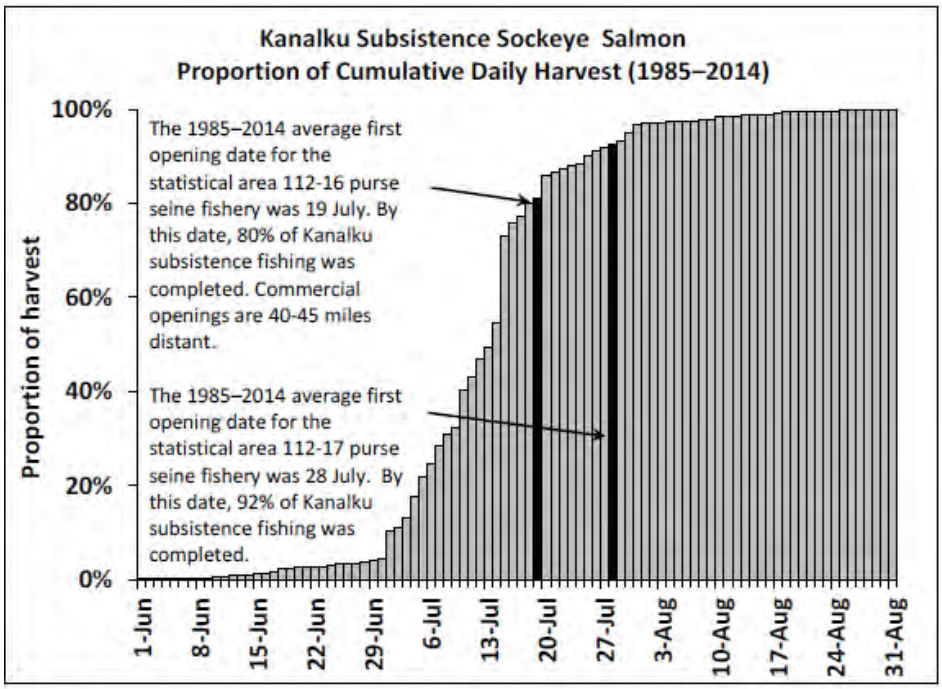


Figure 16.–Daily proportion of the cumulative subsistence harvest of Kanalku Lake sockeye salmon compared to the average opening date of the statistical area 112-16 and 112-17 purse seine fisheries, 1985–2014.

Map figure shows areas closed by ADF&G E.O. in past ten years to protect returning sockeye near Angoon and Basket Bay.

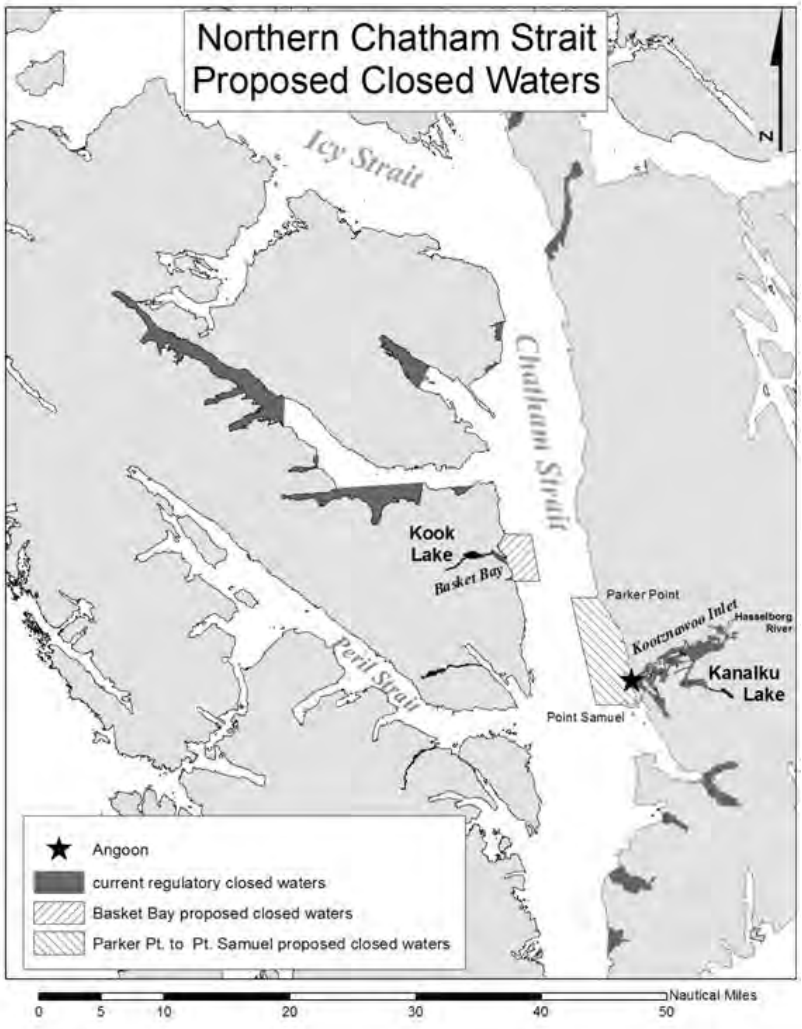


Figure 15 and Figure 8 are lined up to show the first seine fishery date with escap
Note that subsistence fishery takes place in saltwater 1.5 miles from the Kanalku Lake. There appears to be a lag time of one to two weeks from saltwater to base of falls. In both cases whether subsistence harvest or escapement, the fish are far from the fishery

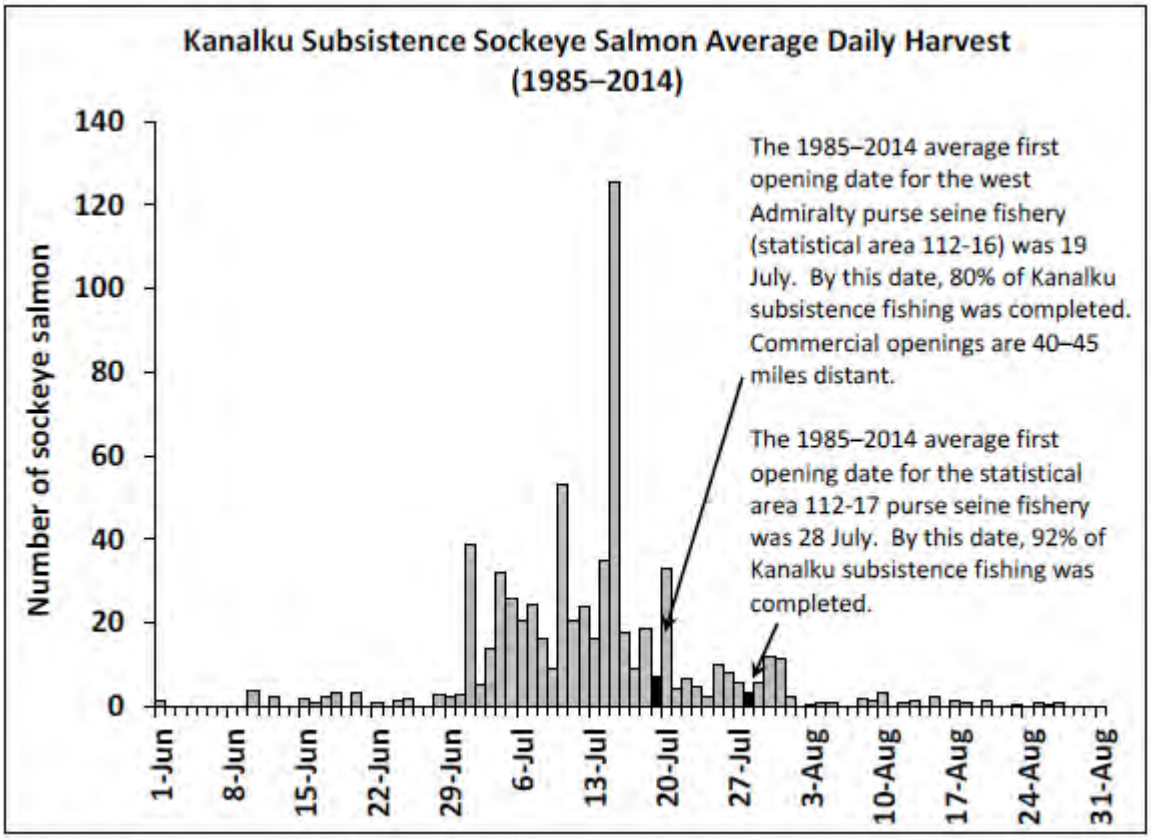


Figure 15.–Average daily subsistence harvest of Kanalku Lake sockeye salmon, 1985–2014.

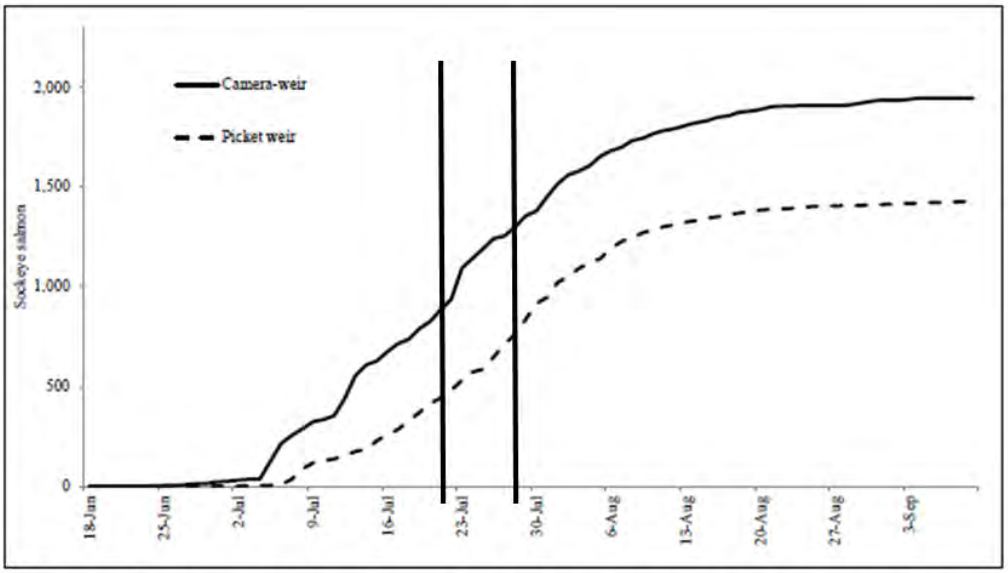


Figure 8.–Comparison of timing and cumulative escapement of sockeye salmon between the camera weirs on lower Kanalku Creek and the picket weir near Kanalku Lake, 2013.

Table 1 show the escapements to Kanalku, Kanalku barrier where up to 50% of the s and Lake Eva, important subsistence harvest systems. Note that in 2012 & 2014 there was very little seining in Chatham; those years do not vary greatly from the 2013 escapement of 1,427, the year of the record seine harvest.

Table 1.–Escapements of sockeye salmon at four Angoon-area lakes estimated from weirs, mark-recapture studies, a combination of both, or "expanded mark-recapture" estimates.

Lake	Year	Type of Estimate	Estimated Escapement[a]	Citation
Kanalku Lake (above partial barrier falls)	2001	expanded mark-recapture	250	Conitz and Cartwright 2005
	2002	expanded mark-recapture	1,600	Conitz and Cartwright 2005
	2003	expanded mark-recapture	280	Conitz and Cartwright 2005
	2004	expanded mark-recapture	1,250	Conitz and Cartwright 2007
	2005	expanded mark-recapture	1,100	Burril and Conitz 2007
	2006	expanded mark-recapture	1,300	Conitz and Burril 2008
	2007	weir with mark-recapture	630	Vinzant et al. 2009
	2008	weir with mark-recapture	1,200	Vinzant et al. 2010
	2009	weir with mark-recapture	2,664	Vinzant and Bednarski 2010
	2010	weir with mark-recapture	2,970	Vinzant et al. 2011
	2011	weir with mark-recapture	728	Vinzant et al. 2012
	2012	weir with mark-recapture	1,123	Vinzant et al. 2013
	2013	weir with mark-recapture	1,427	Vinzant and Heinl 2014
	2014	weir and video weir	1,398	ADF&G unpublished data
Kanalku Creek (below partial barrier falls)	2008	net-video weir	2,518	USDA Forest Service unpublished data
	2009	net-video weir	3,281	USDA Forest Service unpublished data
	---			
	2012	video weir	2,289	Vinzant et al. 2013
	2013	video weir	1,938	Vinzant and Heinl 2014
	2014	video weir	2,148	ADF&G unpublished data
Kook	1994	weir count	1,812	Conitz and Cartwright 2005
	1995	weir count	5,817	Conitz and Cartwright 2005

	2001	expanded mark-recapture	*380*[b]	Conitz and Cartwright 2005
	2002	expanded mark-recapture	*3,600*[b]	Conitz and Cartwright 2005

	2005	weir with mark-recapture	1,994	Van Alen 2008
	2006	weir with mark-recapture	10,165	Van Alen 2008
	2007	weir with mark-recapture	2,958	Van Alen 2008

	2010	net-video weir	6,565	Van Alen and Mahara 2011a
	2011	net-video weir	2,701	Van Alen and Mahara 2011b
	2012	net-video weir	7,651	Van Alen and Mahara 2012a
	2013	net-video weir	1,129	Van Alen et al. 2013a
	2014	net-video weir	7,621	USDA Forest Service unpublished data
Sitkoh	1982	weir count	7,228	ADF&G unpublished data

	1996	weir with mark-recapture	16,336	Kelley and Josephson 1997
	1997	mark-recapture	5,979	Crabtree 2000
	1998	expanded mark-recapture	6,649	Crabtree 2000; Crabtree 2001
	1999	expanded mark-recapture	10,499	Crabtree 2001
	2000	expanded mark-recapture	17,040	Crabtree 2001
	2001	expanded mark-recapture	15,200	Conitz and Cartwright 2005
	2002	expanded mark-recapture	11,900	Conitz and Cartwright 2005
	2003	expanded mark-recapture	8,500	Conitz and Cartwright 2005
	2004	expanded mark-recapture	3,700	Conitz and Cartwright 2007
	2005	expanded mark-recapture	13,400	Burril and Conitz 2007
	2006	expanded mark-recapture	14,800	Conitz and Burril 2008

	2010	expanded mark-recapture	15,324	Van Alen and Mahara 2011c
	2011	expanded mark-recapture	3,347	Van Alen and Mahara 2011d
	2012	expanded mark-recapture	10,460	Van Alen and Mahara 2012b
	2013	expanded mark-recapture	644	Van Alen et al. 2013b
	2014	expanded mark-recapture	9,450	USDA Forest Service unpublished data
Lake Eva	1962	weir count	13,847	Blackett and Armstrong 1965
	1963	weir count	2,925	Blackett and Armstrong 1965
	1964	weir count	1,428	Blackett and Armstrong 1965

	1995	weir count	*7,605*[c]	Yanusz and Schmidt 1996

2) The purse seine fishery has very limited impact on sockeye stocks in upper Chatha

These proposals contend that the seine fisheries intercept large numbers of the Kanalku sockeye stock in seine fisheries north of Angoon particularly in Districts 12 and 14. To address these concerns expressed by the citizens of Angoon and the Federal Subsistence Board, the State of Alaska committed substantial funds to conduct Genetic Stock Identification of sockeye harvested in the Upper Chatham Straits purse seine fishery. ADF&G's recently published analysis *Genetic Mixed Stock Analysis of Sockeye Salmon Harvests in Selected Northern Chatham Strait Commercial Fisheries, 2012-2014* provides scientific GSI data which is contrary to the proposers conjecture. This report using precise genetic stock identification for the northern sockeye stocks including Kanalku shows that although present in the catch, Kanalku (2013) represents 236 sockeye caught or 236 fish in the areas sampled, **representing about a 9% harvest rate**. The 2013 seine season was the largest seine harvest in history when some 90 million pink salmon were caught Southeast wide, even so the Kanalku catch sample expanded out to less than 1% of the total sockeye caught in the sampled northern districts. In 2012 and 2014 the Kanalku catch was significantly less than the already small harvest of 2013.

Figure 9. Genetic Stock Identification for Kanalku Lake stock represented 236 fish. Here it is shown in proportions with other stocks identified in the 112-16, 112-14, &112-17 seine fishery for 2013, the high harvest year. In 2012 & 2014 seine openings were very limited and therefore Kanalku and other fine scale reporting groups had to be pooled for statistical analysis and those years are not represented here, although total for all Chatham small were 208 & 194 in 2012 & 2014, respectively.

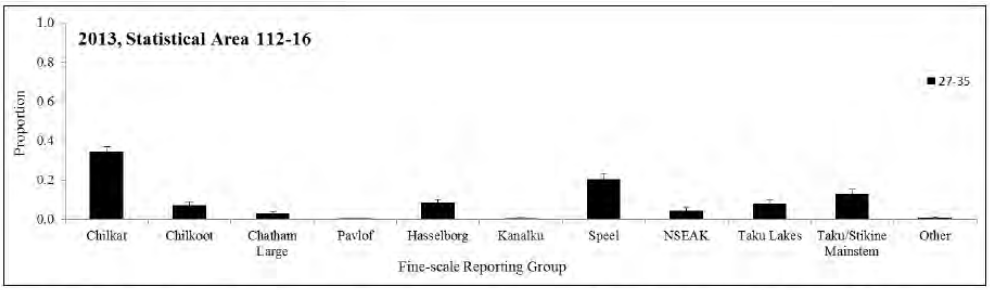


Figure 8.–Fine-scale reporting group proportional stock composition estimates (and 90% credibility intervals) of sockeye salmon harvested in in statistical area 112-16 test and common property commercial purse seine fisheries for the 2013 season (all statistical weeks combined).

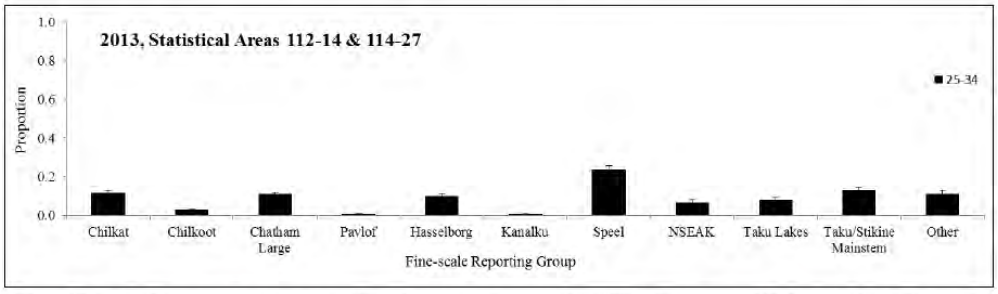


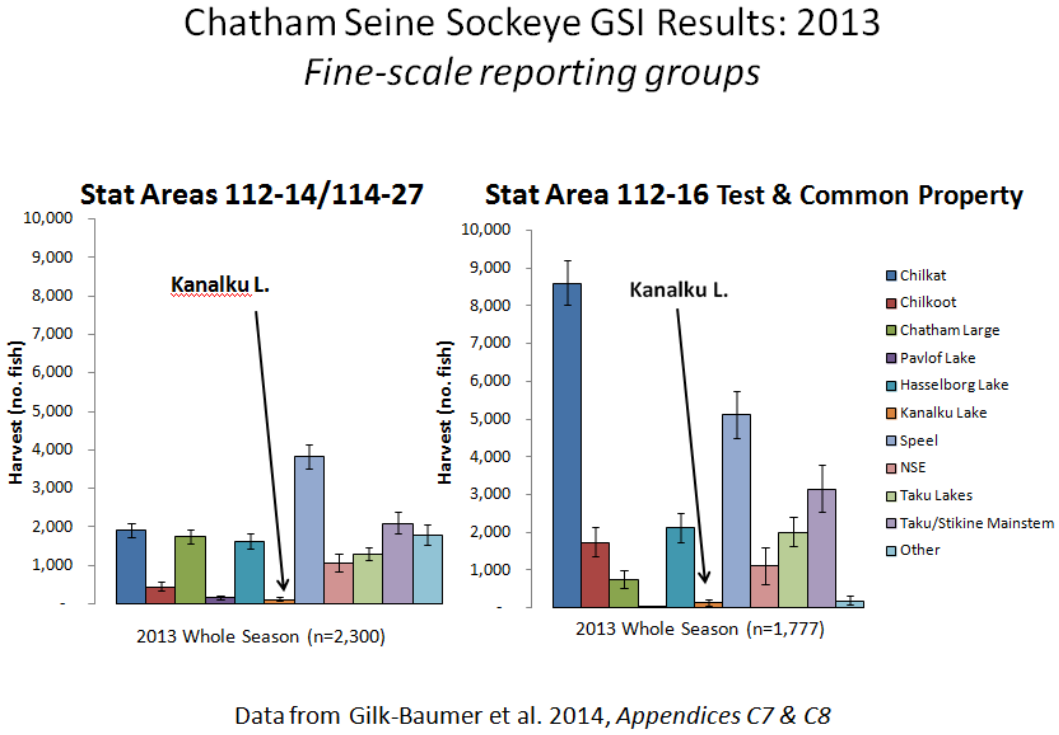
Figure 9.–Fine-scale reporting group proportional stock composition estimates (and 90% credibility intervals) of sockeye salmon harvested in statistical areas 112-14 and 114-27 commercial purse seine fisheries for the 2013 season (all statistical weeks combined).

The escapement to Kanalku Lake for the study years was 1,938 to 2,289 sockeye. Kanalku is a unique system due to its barrier falls which often prevents 50% of the fish from entering the lake on years of high water velocity. **In 2012, 2013 and 2014 approximately 10 times more Kanalku sockeye were killed by the falls**

than were harvested in the Chatham purse seine fishery (see Table 1, page 5 above). T… documented the need for fish passage improvement since 1968. In 2013 and 2014 work was done to deepen the plunge pool at the base 16 foot partial barrier. Success of the sockeye is determined by fitness but more importantly by the hydraulic dynamics created by the falls at high water or at very low water events. During the study years 2012 – 2014 the sockeye making it into the lake was 1,100 to 1,400. Limnological studies are indeterminate as to whether the escapements are commensurate with lake productivity.

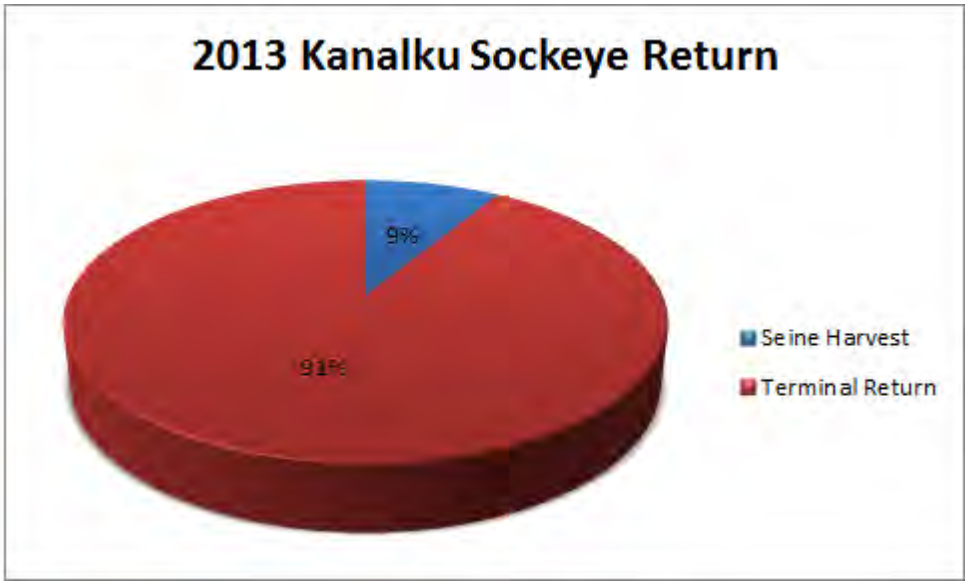
Most importantly ADF&G closes waters by time and area to seine fishing in order to allow Kanalku and other sockeye stocks to pass. In June and early July few areas are open for seining, including test fisheries, Augusta, Hawk Inlet and Hidden Falls. These areas were open in 2012 and 2014 when the seine harvest rate on Kanalku sockeye was closer to 0% than it was to 1% harvest rate. This is a time when many sockeye pass into terminal areas, approximately 80% of the sockeye run is in or near the terminal area before the seine fleet begins fishing Chatham Strait. Rare is the case but occasionally a massive record return of pink salmon pushes the bell curve out early enough to breach the 80% range, meaning that in almost all fishing seasons, the Chatham fishery doesn't begin until 80% of the subsistence stock and harvest are past the Chatham fishery (see graphs 15 & 8, page 4 above). Even in those unusual years it is likely that 70% of the subsistence sockeye have passed prior to the fishery. This is why the very low harvest rate of 9% is achieved when the seine fleet has a record year as it did in 2013. When the seine fleet fishes just hatchery access and test fisheries the harvest of Kanalku sockeye shrinks to near zero. ADF&G's *Nothern Chatham Strait Sockeye Salmon: 2014 Updated Stock Status, Fishery Management, and Subsistence Fisheries* presents escapements, fishing districts, opening dates and subsistence harvest which demonstrate the department's wise use of management tools and the results they deliver for Kanalku sockeye escapement and subsistence opportunity.

Management measures work as this graph shows; Kanalku cumulative catch is 236 fish



Data from Gilk-Baumer et al. 2014, *Appendices C7 & C8*

In 2013, Kanalku subsistence harvest, sockeye at base of falls that did not rea[illegible] escapement represent 91% of the return. The commercial interception of sockeye in the seine catch represents 9% of the return.



3) <u>The purse seine fishery in upper Chatham Straits harvests substantial numbers of pink salmon therefore restricting the weekly opening to no more than 15 hours or eliminating all purse seining would prevent harvest of large numbers of salmon, with concurrent loss of economic value.</u>

The purse seine fishery in upper Chatham Straits targets pink salmon, which are largely bound for streams in District 15 to the north and Districts 9 and 10, 11, & 12 to the south and east. The harvest in District 12 comprises a substantial part of the region wide seine fishery harvest in Southeast Alaska. As recently as 2011 it represented nearly 40% of the entire Southeast fishery. Pink salmon in north Southeast Alaska generally follow a two-year cycle, possibly due to recent freeze and drought cycle that has resulted returns in odd year larger than those seen in even years. When the Icy Strait and Chatham Strait resurgence began in 1982, the cycle was even year dominant. In 1985 this switched dramatically after the phenomenal 7 to 1 spawner recruit in 1989. The odd year cycles have been dominant in the northend since, with a strong even year accompanying cycle in 1992, 1994 (*the current SE record for northend in its day, to become eclipsed by 1999, 2001 and then 2011 and 2013*), and 1998-2004. Then in 2004 we had the drought of the century, followed by a relatively awful winter in 2006, followed by a devastating northend winter in 2010 (worst we'd seen since the resurgence of 1982). Since the purse seine fleet is strictly managed to harvest pink salmon surplus to spawning escapement needs, the seasons of 2012 and 2014 were not fished on the northend, save for test and hatchery terminal harvest areas. Not surprisingly nearly zero Kanalku sockeye were caught in those years. Seemingly then in 2008 and 2010 the sockeye catches would also have been near zero. One would expect to see a bimodal influence on Kanalku sockeye abundance since the seine fleet harvest big pink years in 2007, ’09, ’11, & ‘13 but were nearly off the water in 2008, ’10, ’12, &‘14. Since the total numbers of Kanalku sockeye in the terminal area differ very little in the four big odd years of fishing, (with an inferred harvest rate of 8% based on the 2013 GSI study) and 4 complete years of little or no fishing and zero harvest rate in the even-years, it appears the seine interception is not detrimental to Kanalku subsistence harvest and escapement.

In 2013, a strong year for pink salmon, the traditional, historical purse seine fishery in district 12 harvested 8,653,730 pink salmon which comprised about 10% of the region-wide seine fishery harvest of pink salmon. The District 12 fishery in

2013 also took about 390,000 salmon of other species including more than 300,000 Chum. Sockeye harvest totaled less than 40,000 which is mostly composed of Chilkat, Berners, and Chilkoot Lake stocks, all very large systems.

The purse seine fishery is initiated or not each year based on the abundance of pink salmon. There is a very careful entry into the pink salmon management depending upon strength of the pink salmon cycle but with regard to the bell curve of the Chatham sockeye stocks and subsistence fisheries. In most years about 75% of the Chatham small stocks have passed, although on occasion when the pink salmon cycle is phenomenally large or early. Even then there is great care taken to defer until stat week 30 (third week of July). In 2013 beginning on July 21(notably and ironically the standard last day of Kanalku subsistence fishing for Angoon residents) (stat week 30) and continuing to September 7 (stat week 35) the fishery was open for a total of 78 hours each week with two 39-hour openings. While harvest is important, **sustained yield is foremost**. Consequently the purse seine fishery is managed with caution even when abundance is very high. In 2013 the escapement index value in District 112 was 278,000, which is well above the lower bound SEG of 119,000 index fish.

4) <u>The Decline of Subsistence Harvests and Participation in Commercial Fisheries, Angoon</u>

There has been a major decline in salmon limited entry permits held by Angoon residents as reported by ADF&G Subsistence Division and CFEC (Chatham Stock Assessment report pg. 22; and Turek, 2000). In summary, there has been a decline in CFEC permits from 134 in 1980 to 3 permits in 2013. There has been a decline in population since 1990 when it was 640 to 457 in 2013. Finally, there has been a decline in subsistence participation. These declines, especially with commercial permits lower mobility and range for subsistence harvest, which tends to focus harvest closer to home.

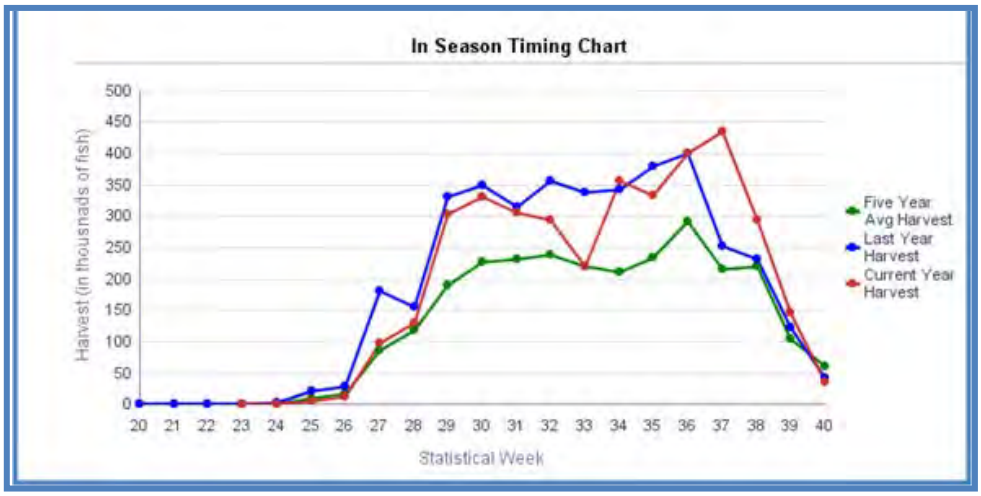
Fundamentally proposals 193, 200, & 200 do not have scientific merit and therefore should be voted down.

The Sitka ADF&G Advisory Committee Sitka opposed proposal #193 by a10:0 vote with 2 abstentions, and opposed proposals #199 & #200 by unanimous vote 12:0

<u>Oppose</u> Proposal 194 & <u>Oppose</u> Proposal 195 – Close portions of Lisianski Inlet to purse seine gear.

These proposals assert that the purse seine fishery in Lisianski Inlet harvests local coho causing a conservation concern. No scientific evidence is provided to indicate or demonstrate a conservation concern. It is very likely that some local coho stocks are caught but unlikely at a level that creates a deleterious effect. Southeast Alaska coho stocks showed record returns in 2013 and 2014 (see graph below). Both years were well above the recent 5 year average and even the average is considered by ADF&G to be robust.

Graph from ADF&G web site for 2013 and 2014 S.E. coho harvest (all gear) of more than 3 million fish compared with 5-year average (lower green line).



Furthermore, coded wire tag data shows that the Lisianski seine fisheries catch a variety of coho stocks with Hidden Falls hatchery program leading the mixed stock interception by a wide margin (Lisianski CWT pivot table below). In 2013, for example just over 10,000 coho were caught with the 2.2 million pinks harvested in Lisianski (Table 194-1 below). Of these coho 4,500 were from Hidden Falls; another couple dozen originated from Medvejie. The closest ADF&G indicator stock with CWT marked coho is Ford Arm Lake on the outside of Chichagof Island in which the expanded catch data shows that in 2013 122 coho were caught. Ford Arm Lake remains a healthy and productive coho stock.

Table of expanded coded wire tag data for Lisianski seine catch for odd years 2007 – 2013, note numerous stocks are present with Hidden Falls hatchery coho being the dominant stock in the catch.

Lisiansk Inlet Seine Catch CWT Expanded Catch

	Year			
Site	**2007**	**2009**	**2013**	**Total**
(W)FORD ARM LK 113-73	29	33	122	184
(W)NAKWASINA R 113-43	9			9
(W)STIKINE R 108-40	7			7
(W)TAKU R 111-32	9			9
MACAULAY	130			130
HIDDENFALLS		98	4,562	4,193
MEDVEJIE			26	26
PORT ARMSTRONG	177			177
Grand Total	**362**	**132**	**4,710**	**5,203**

ADF&G management report Table 194-1 shows the Lisianski harvests since 2001. It is clear from the catch data that odd year harvests can be large and have varying degrees of mixed stock catch. Coho harvest has ranged from zero to 10,379 with an even year average catch of 41 coho and an odd year average of 2,616. The largest coho harvest year 2013 consisted of 44% Hidden Falls coho, or 4,562 fish.

Table 194-1.–Lisianski Inlet (113-95) purse seine fishery harvest, 2001-2014.

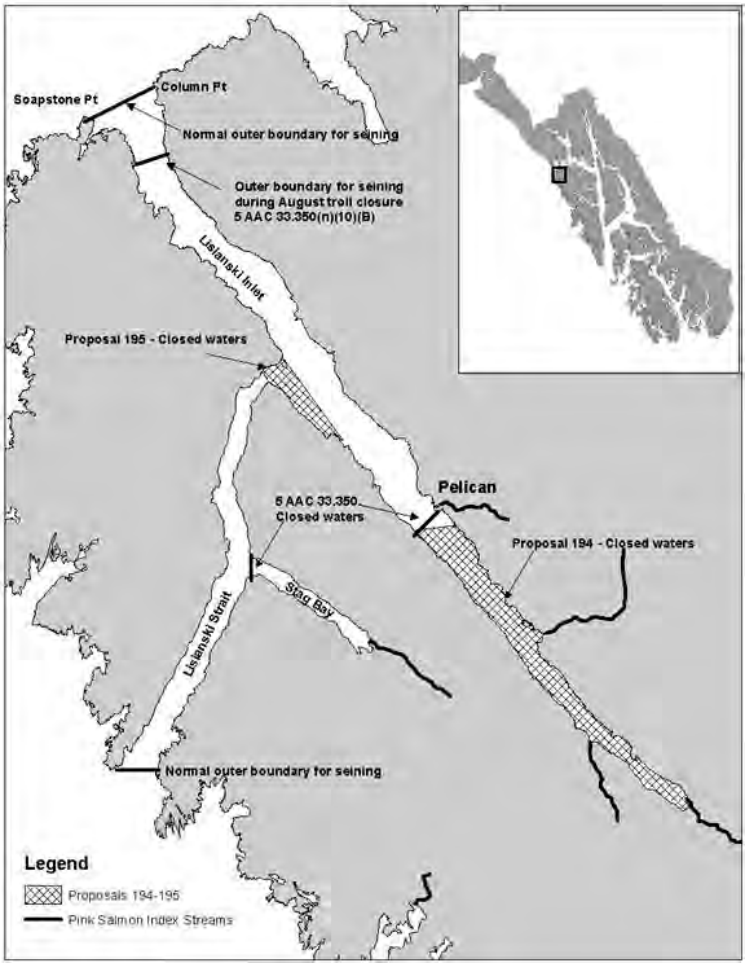
Year	Sockeye	Coho	Pink	Chum	Escapement Index[a]
2001	2,436	784	529,181	7,460	652,000
2002	-	-	-	-	147,432
2003	206	-	9,615	817	335,790
2004	-	-	-	-	87,000
2005	958	628	136,330	4,923	539,000
2006	55	55	113,049	2,660	233,000
2007	1,643	1,927	706,743	14,045	428,000
2008	25	203	81,489	2,298	248,000
2009	1,732	1,265	597,973	8,138	343,000
2010	14	10	11,531	522	249,000
2011	4,368	3,331	1,650,084	18,573	397,000
2012	3	22	6,407	945	273,000
2013	6,711	10,379	2,226,343	92,638	789,000
2014	-	-	-	-	268,000
Average	1,297	1,329	433,482	10,930	356,373
Even-yr average	14	41	30,354	918	215,062
Odd-yr average	2,579	2,616	836,610	20,942	497,684

[a] Pink salmon escapement index management target range for the Lisianski stock group is 80,000-270,000.

The pink salmon escapement index for Lisianski stock group is 80,000 to 270,000 which has been met every year since 2001. In fact, the target range has been exceeded by a wide margin in seven of the past fourteen years. ADF&G manages Lisianski by time and area with several areas designated as closed waters (see ADF&G management map below). The major coho streams are at the head end of Lisianski and within closed waters. In addition, normal coho fall stock run timing to freshwater is mid-September to early October, subsequent to the seine fishery.

Most of the stocks of coho identified by CWT in the seine catch have eighty nautical miles to go on their journey. It is likely most of the local Lisianski stocks are farther out to sea in August. In August there is usually a troll closure to allow coho to pass to the inside waters of Southeast. During this period of August the department pulls the seine line farther into Lisianski to eliminate the purse seine hookoffs at Soapstone Pt and adjacent points.

Map of Lisianski showing existing ADF&G 5 AAC 33.350 closed waters and proposed closure lines. Most of the requested closure area is already closed waters.



A final point regarding allocation of coho which was promulgated at the 1989 Board of Fish meeting in Juneau is pertinent to this issue. In the recent ten years 2004 – 2013 the seine allocation is 6% below their target range and the troll 7% above their target range. This adds up to around 6.5 million coho salmon. If the proposer wishes to address a fundamentally new approach to coho management in the net fleets, might we suggest that the entire question of SE wide coho allocation and harvest be considered in its entirety. Since the seine fleet harvests an average of 13% of the coho in all of S.E. Alaska and troll harvest 68%, seeking to address the local troll fishery might have 5 times the benefit on the average vessel. Considering that most years in Lisianski are low harvest years, pulling a troller or two off the ocean would probably bring more cohoes back to Pelican than shutting down the entire seine fishery in Lisianski Inlet.

Certainly adopting any of these proposals to a community which asks for fishery closures not based upon merit or actual issue, but upon speculative notions and convenience would cede authoritarian control to a local entity.

SEAS doubts that this is a precedent that Alaska Trollers Association nor most S.E.Troller[illegible] follow. Alaska management is based on sound science, not gear type or community speculation.

Table showing Board of Fish designated allocation percentages of coho among gear groups and actual results in percent and catch averages. Note the past ten year average shows trollers 7% above their prescribed allocation.

	Seine	Gill net	Set net	Troll	Total
Allocation	19%	13%	7%	61%	100%
1962-2013	333,425	262,305	141,388	1,238,144	1,975,262
2004-2013	294,993	312,316	127,399	1,581,723	2,316,431
1962-2013	17%	13%	7%	63%	100%
2004-2013	13%	13%	5%	68%	100%

Lisianski isn't a huge driver in the S.E. allocation of coho (the Hidden Falls coho in 2013 do not count toward the allocation as they are hatchery fish), but reduction of any coho catch by the seine fleet and consequent increase by the trollers would only widen the allocation gap set by the board.

These proposals were voted down by Sitka ADF&G Advisory Committee meeting.

Oppose Proposal 196 & Oppose Proposal 197 New statistical areas for Lisianski Inlet

Parsing of the statistical areas will not result in higher quality catch data or better management decisions, although if the department believed that it would have such a result we would be in support. The traditional stat areas have been used for management for all of this century and most of the last. There is no fundamental reason to change the stat areas save for the speculative nature of the proposer's desire to have a hatchery and therefore must be looking to change the lines to accommodate potential hatchery production.

Sitka AC took no action on these proposals

Oppose Proposal 201 – Close waters to seine fishing around Angoon and Basket Bay. While SEAS supports the intent and spirit of this proposal, ADF&G's proposal #198 uses lat/long and is more precisely described. Proposal 198 accomplishes the same end.

Sitka ADF&G Advisory Committee opposed this proposal 7:4, 1 abstain. The AC likewise supported ADF&G's proposal 198.

Support Proposal 146 – ADF&G published *Customary and Traditional Uses of salmon and Options for Revising Amounts Reasonably Necessary for Subsistence Uses of Salmon in Districts 12 and 14, Southeast Alaska* which provides six new options for establishing a specific ANS for each district. The ANS is based on

all salmon used for subsistence and not just one species or stock. Given that sockeye and C[illegible] a five to six year life cycle is seems logical to use a ten year period for the base years in formulating the range of harvest. Using the 10-year standard deviation has statistical merit but sets District 14 low range at only a 100 salmon.

OPTION C: 10-YEAR LOW AND HIGH HARVEST

Option C would be to base the revised ANS on the most recent 10-year (2003-2012) lowest and highest harvest based on subsistence salmon permit returns. For District 12 the lowest harvest was 317 salmon while the highest harvest was 2,162 salmon (Table 2). This could be rounded to 300-2,200 salmon (Table 12). For District 14 the lowest harvest was 315 while the highest harvest was 3,939 salmon (Table 4). This could be rounded to 300 to 3,900 salmon (Table 12).

Table 12.–Option C: revise the ANS based on recent 10-year lowest and highest salmon harvest.

			Rounded	
	Low	High	Low	High
District 12	317	2,162	300	2,200
District 14	315	3,939	300	3,900

Option C: 10-year low and high harvest from 2014 ADF&G Subsistence Division Report

Support ADF&G Proposal 198 – Establish closed waters in regulation near Angoon referred to as Parker Pt to Pt Samuel and an area encompassing Basket Bay on the Chichagof shoreline. These areas have been closed to seining for most of the past ten years and this proposal formalizes the areas in regulation.

Sitka AC supported this proposal 11:0, 1 abstain

The following group of proposals encompasses the body and spirit of the SEAS-USAG-PVOA-PSVOA agreement between the net fleets.

Support 183 – Agreement among SEAS, USAG, PVOA and PSVOA representing the gillnetters and seiners net groups in Southeast. This proposal is part of a broad suite of proposals encompassed in this section. This proposal turns back the clock for a 3 year sunset to allow 2-1 gillnet to seine opportunity in Deep Inlet post week 30. This change does not bring the fleets closer to enhanced allocation numbers but is part of an overall strategy to work with new production and adopt a wait and see approach rather than changing traditional and historic fisheries.

Support 186 – Agreement among SEAS, USAG, PVOA and PSVOA representing the gillnetters and seiners net groups in Southeast. This proposal is part of a broad suite of proposals encompassed in this section. This proposal turns back the clock for a 3 year sunset to allow 2-1 gillnet seine opportunity in Anita Bay post week 30. This change does not bring the fleets closer to enhanced allocation numbers but is part of an overall

strategy to work with new production and adopt a wait and see approach rather than changing traditional and historic fisheries.

Support 187 – Agreement among SEAS, USAG, PVOA and PSVOA representing the gillnetters and seiners net groups in Southeast. This proposal is part of a broad suite of proposals encompassed in this section. This is a placeholder proposal to allow all 3 gear groups to be part of the discussion of future (post 2019) potential SE Cove harvest opportunity.

Support 190 – Agreement among SEAS, USAG, PVOA and PSVOA representing the gillnetters and seiners net groups in Southeast. This proposal is part of a broad suite of proposals encompassed in this section. They rise or fall together so if the board is inclined to change course on any of these proposals just be aware that a change to any changes all. This proposal seeks to include up to 2,000 wild harvest Amalga sockeye on the Hawk Inlet cap. It represents the best compromise between the representatives of the abovementioned four groups.

Support 207 – Opens the beach in special high abundance pink salmon years for gillnetters who have been slightly offshore in 6-D. Part of the same SEAS, USAG, PVOA, and PSVOA agreement intended to assist gillnets in harvesting more pink salmon.

Oppose 175 – Southeast Enhanced Salmon Allocation Plan is working well. No need to change.

Oppose 176 – Same comments as 175. Southeast Enhanced Salmon Allocation Plan is working well. No need for change.

Oppose 188 – All 3 gear groups should be allowed to be in a THA or SHA. The proposal is ill-timed and selfish in nature. SEAS, USAG, PVOA and PSVOA as well as all of our accompanying chum gillnetters and chum seine divisions of our organizations stand opposed to this proposal.

Oppose 191- SEAS, USAG, PVOA and PSVOA agreed to count the first 2,000 wild sockeye as satisfaction for area changes and conservation. This has been the average harvest in 2012 - 2014. Also this proposal would poison the other aspects of this multi-proposal agreement among the four fishing organizations.

Final group of proposals that SEAS opposes:

Oppose 173 – This proposal would damage the state of Alaska's ability to manage. We are opposed to the entire premise that subsistence needs are not being met. This issue has more to do with the 2,200 sockeye killed at Kanalku falls rather than the 236 harvested by the seine fleet in the years 2012-2014. Please see extensive comments on Kanalku harvest, escapement, genetic stock identification, and barrier falls mortality for opposition to proposals 193, 199, & 200.

Oppose 202 – SEAS members are polled biannually and are opposed to changes, be they large or small, that allows vessels built larger than 58 feet to be brought to Southeast to fish salmon in the seine fishery.

Oppose 203 – Oppose Jason Schull. Absurd proposal that begs the question, "when are we going to require a 2nd signature?" for future board of fish proposals.

Oppose 204 – Unenforceable and negatively affects small family businesses. Small planes and fish spotting is a tradition in Alaska; adopting this would put people out of work.

Oppose 228 – Record coho returns. 10 day closure is a conservation tool in the toolbox. Leave it there.

Southeast Alaska Seine members and executive director will be at the Sitka meeting; we would welcome the opportunity to talk with board members about the fishery, these proposals and answer any questions. We would also like to serve on the board committee formed to address these proposals.

Thank you for your time and commitment to the board process and the opportunity to comment.

Sincerely,
Robert M. Thorstenson, Jr.,

Executive Director,
Southeast Alaska Seiners

REFERENCES & LITERATURE CITED

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Submitted By
Joel Randrup
Submited On
2/9/2015 10:02:33 AM
Affiliation
Self-Gillnetter

To the Board of Fish,

I do not support proposal 208 - 5 AAC 33.331. Gillnet specifications and operations. Establish a drift gillnet mesh size restriction in District 8 when the directed king salmon fishery is closed, as follows: "in District 8 during years of no directed king salmon fishing, the maximun mesh size allowed is (6) inches."

There data does not support a mesh restriction as proposed because there is not a conservation issue with this fishery. Depending on the year, the numbers of fish the gillnetters harvest is as much as three times less than the trollers and two to three times less than the sport/charter (the sport component is an estimate becaue they don't have fish ticket or log book data...which they should have). If adopted this would place an undue burden on the gillnet fleet by reducing our ability to harvest the hatchery component of chinook salmon by reducing the area of operation with a larger mesh net (king net) to only Anita Bay THA. The issue of fairness between user groups as the proposer suggests is falsified with the numbers of fish caught by both the trollers and sport/charter. Also, the trollers and sport/charter catch and release fish for size limit and/or trophy quality which is an unknown mortality component.

Thank you,

Joel Randrup

Submitted By
Ray Wadsworth
Submited On
2/9/2015 10:23:04 AM
Affiliation
Kodiak Marine

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Comments on proposal # 202 to the Board of Fish

by Ray Wadsworth,

Kodiak Marine Construction Co.

As a vessel designer and builder, I have relied on the practices and standards, established by the U.S. Coast Guard and the Naval Architect industry, regarding vessel length. I would like to make the BoF aware that the “design length” is the length and breadth to the “inside” of the Planking, plating or layup, which really does represent the “buoyant envelope” of the vessel. The thickness of the planking, plating or layup depends on the rake of the bow and stern ends. The greater the rake, the thicker the Planking material when the measurement is taken horizontally. For example, a plank 1” thick that is standing vertical is almost 1.5” thick on the horizontal measurement when laying forward at a 45 degree angle. Hence, a design length of 58', might have an overall length of 58.5', while the buoyant envelope is exactly 58'. (This would be really hard to measure in the field).

My concern over this issue before the BoF is that I have started construction of 3 vessels, and I need to make sure that the rules don't disrupt what I have already designed and built. My 58' design is 58' to the inside of the plating which constitutes the buoyant envelope of the vessel.

I propose that the BoF adopt the industry practices for all measurements and rely on the Coast Guard documentation papers for measurement references regarding any vessel. If the documentation paters are incorrect for some reason, say a vessel was lengthened or widened, then by existing laws, the vessel must be re-measured and new, or amended documentation papers drafted.

Sincerely, Ray Wadsworth

TO BOARD SUPPORT.

THE first half of these documents are CHUM TROLLERS historical record of our ATTEMPTS TO GAIN ACCESS TO chum SALMON & OTHER TROLL PROJECTS.

THE SECOND HALF ARE IN SUPPORT OR OPPOSITION TO the 2015 Board of Fish Proposals.

THESE MINUTES DEMONSTRATE TWO THINGS:
(1.) THE 2 TROLL DAYS IN DEEP INLET A PURPO
SEPARATED FOR THE BENEFIT of the NET

NSRAA Board of Director's Meeting Minutes ~ SPRING 2013

March 5-6th, 2013 1308 SMC Rd., Sitka, Alaska

Call to Order: 9:00 AM March 5, 2013
The meeting was called to order by President Kevin McDougall.

Roll Call

Gillnetters present: Brad Badger, Richard (Botso) Eliason, Jr., Kevin McDougall, Mike Nilsen and Dan Pardee. Seiners present: John Barry (Late, arriving after lunch), Mitch Eide, Sven Stroosma, Dean Haltiner, and John Carle. Trollers present: Alan Andersen, Richie Davis, Eric Jordan, George Eliason, and Jim Moore. Other Board members present: Brian Massey-Sport, John Blankenship-Subsistence, Marlene Campbell-Municipality, Carl Johnson-Interested Person, Mike Forbush-Processor, Deborah Lyons-Crew Member (late), Wade Martin-Native Organization, and Dave Moore-Interested Person. New: Will Bergman – Conservation and Karl Wolfe –Interested Person

Staff, Agencies and Public were also present. An incomplete list of those attending includes Flip Pryor ADFG, Eric Prestegard DIPAC, Carrington Gorman-NSRAA, Bert Bergman and Howard Pendell, Trollers, Joel Hanson-The Boat Company, Chip Blair-NSRAA and others.
Establish Quorum: 23 of 25 Board members are present at 9:10 AM. John Blankenship served as Secretary until Deborah arrived at 9:30.

Introductions: The President welcomed the new Board members and the Board members introduced themselves. Others attending the meeting also introduced themselves.

Approve Agenda:
Richie requested that the President add a Chinook Futures funding discussion to tomorrow afternoon's agenda. The President noted that funding requests are better handled when submitted in time to be on the agenda. The President asked if there was a **motion to approve the amended agenda** Dan Pardee replied "So moved" and Mitch seconded the motion. **Motion 3/5/13 (a) M/S Mitch/Dan** At this point, prior to the vote being taken, Eric Jordan offered some additional changes to the agenda. He had sent an email out with the suggested changes and had discussed them over the phone with the President. Eric suggested that the Committee appointments be moved to follow directly after election of officers. The President said that he would accept that change. Eric suggested that the Deep Inlet Harvest Plan be discussed today within the agenda item "Harvest and Cost Recovery Plans". He thought this would allow the troller to present their proposal for an initial discussion and then the proposal could also be discussed with the other gear groups this evening during a discussion about allocation. Eric thought the final discussion could take place at 1:30 tomorrow. He also made a point that the cost recovery and assessment plans might better be discussed after the budget is passed. The President clarified to Eric that in a previous phone conversation, he had found the concern about timing a discussion of the cost recovery plans for after the budget to be a non-issue because in this unusual year there is not going to be much going on in the way of cost recovery (because of the Hidden Falls Assessment and the DIPAC contribution eliminating cost recovery at Deep Inlet.) The President did not support further changes to the agenda, mentioning that he had worked with staff to lay it out in a way that could move the board through the issues. He qualified this statement by saying "Unless it is the will of the Board to change it". Motion 3/5/13 (a) was restated by Mitch and seconded by Dan M/S Mitch/Dan "To accept the agenda as written." Discussion continued and Steve explained that he had separated the Deep Inlet discussion on the agenda because it normally takes a lot of Board time ,but concluded that he

SEE ATTACHED FOR UNHEARD CHUM TROLL ASSOCIATION PROPOSAL

SHOW THEY BOTH HAVE A "build-up" DAY. 2.) THE BLATANT MANEUVER TO PREVENT THE CHUM TROLL DEEP INLET PROPOSAL FROM BEING PRESENTED.

could work with whatever the Board decided to do. James Moore said the chum trollers have a proposal they want to discuss with the Board and they want to present the plan this afternoon and then have a chance to hash things out with the net gear groups in discussions tonight, after the Board meeting. The President said he is having a problem because he had been told that a plan was being developed but nothing had been submitted to him prior to the Board meeting. Eric replied that he personally was not going to submit the proposal. The discussion ended when the question was called the President summarized **"The motion has been made to accept the agenda as modified"** Mitch initially wanted the motion to remain "To accept the agenda as written" **The President stated it was his understanding that the amended agenda included the Chinook Futures discussion and moving the Committee Appointments to follow the Election of Officers and Mitch agreed to the modifications.** The vote was taken and the motion, as stated by the President, carried with 16 voting in favor and the number of opposing votes not recorded. There was no written record of the Agenda motion and discussion and this account was created from the meeting recording, by the Secretary, after the meeting.

Approve Minutes
Motion 3/5/13 (b) M/S Brian/Botso to accept the minutes of the November 13&14 2012 Board meeting as written. MCWOO

Election Committee report, Certify Election Results & Seat New Board members
Motion 3/5/13 (c) M/S Eric/Brian To accept the report of the Election Committee certifying the legal election of Eric Jordan At-Large Power Troll, Richie Davis At-Large Troll, Mike Nilsen At- Large Gillnet, Sven Stroosma At-Large Seine and Dean Haltiner At-Large Seine. MCWOO

Election of Officers – President, Vice/President, Secretary/Treasurer
Motion 3/5/13 (d) M/S Mitch/Dan Re-elect the existing slate of officers. MCWOO

Conflict of Interest Statements
Board members were asked to fill out the form under TAB 3 and turn them in. Board members also instructed to get together with Jean about travel arrangements sooner rather than later. Steve explained Board members will be filing the conflict of interest statements once per year at the spring meeting, instead of at every meeting. These are required on the advice of our accountants.

New Facilities Committee Discussion
Eric reported on candidates for the New Facilities Committee. Eric will serve for Trollers, Sven for Seiners, Marlene and Will Bergman have also volunteered. Dan Pardee volunteered for the Gillnetters. The President agreed that this will constitute the New Facilities and Production Committee. They were all appointed, and all other Board members were invited to attend the meetings.

Investment Committee is now composed of Deborah and Kevin and Steve R. Brian Massey volunteered and was appointed to the Committee.

General Manager's Report

- Steve thanked the staff for all their hard work preparing for the Board meeting, for their excellent care of the fish at all the facilities and for successfully arranging for rooms for all the Board members at a time when Sitka is overflowing with visitors attending the basketball tournament.

reasons already explained: coho price, SET tax and fish food, the amount NSRAA actually needs to cost recover changed. Expenses went up to $1.8M. So, a little more cost recovery is needed. DIPAC may have funded the full amount but the timing was very awkward and it didn't seem right to say "Oh, now NSRAA needs another $300,000." Kevin thought it was still important to maintain the benefit to the fleet of the no cost recovery this year and the advantage of the additional fishing opportunity made possible by the DIPAC contribution. After talking with Steve and staff it seems quite possible to get the cost recovery needed without having to close Deep Inlet and that was the recommendation of the budget committee. Steve made some additional comments concurring with Kevin's remarks. Chip said if there has to be a closure for broodstock that might provide a CR opportunity as well. The increased releases at Bear Cove for chum broodstock won't be showing up for another year or two. A Board member asked if the shortfall in SET revenue might still be forthcoming and Steve said, "Yes, a phone call today had a positive outcome and the matter has now been elevated for review, and hopefully, action." If we find out in two weeks we can cancel the CR but if we have to put the contracts out we will honor them and then we would have a surplus to apply to CR next year." In response to a question from the Board Steve said the CR areas will be outside Silver Point, Camp Coogan and Bear Cove.

The President said there has been some discussion among the net groups about whether they would make changes to the way the harvest has been divided in the terminal harvest area in the past few years and asked if anyone wanted to present an option. Mitch requested that Chip present an option that had been developed and made the following motion: **Motion 3/5/13 (f) Mitch/ Botso The Deep Inlet Harvest schedule will be the one that Chip is going to put up on the wall.** When the President saw the schedule as presented he said the schedule was not correct and the alternative shown showed the rotation applied to the whole season but the groups had intended that it begin in August and the earlier season remain unchanged. Chip said the schedule now shows a build up day for each gear group rather than just a build up day for the seine group, as it is right now. Chip explained the 1:1 ratio is maintained and goes to 45 hours per opening for each group but the gillnet hours are split with three days fishing and the seine hours are split with two days fishing. This is to keep with the change from the 2:1 ratio made to the 1:1 ratio at the Board of Fisheries. A troll asked why the troll days are referred to as build-up days? Is it because the troll impact isn't enough to affect the build-up of the chums? The President said that is how it has been that when there is no net fishery scheduled, there is a troll day. This schedule show a Monday Tuesday Saturday Gillnet but the build-up day could be on any day it doesn't really matter. Chip said he had prepared some other options that could be looked at. A seiners thought a Sunday build up day would be better, another seiner said he liked the current Saturday but it didn't really matter to him. Chip showed a different schedule that would give the same amount of hours. A member of the public Tad Fujioka, Chair of the Sitka ADFG Advisory Committee, was recognized by the President and he said the regulations state that "Anytime the Inlet is not open to the net fisheries, it is open to trolling." The President thought that was an error, (also saying, "Unless I'm wrong") and was actually NSRAA policy, not regulation. To clarify the point Steve referred to the 5 AAC Regulations reading: "Salmon may be taken by troll gear when the waters described in this section are closed to net gear."

A troller James Moore, said, "I'm sure most of the Board members have taken a look at the letter that was sent out by the Chum Troller's Association and I was wondering if Tad Fujioka who is acting chair of the chum trollers association would be able to present their proposal." The President asked why one of the chum trollers on the Board wasn't making the presentation rather than someone not on the Board. James said, "It was felt that it was more appropriate for the Association to present the proposal to the entire Board and not wanting to fracture the unity of the Board." A seiner, Mitch, objected, saying "There is a motion on the floor." A troller, Eric,

said he thought the presentation was relative to the motion and in the past the NSRAA chair had recognized members of the public to speak on a proposal under discussion. A point of order was made by a gillnetter that in order to do that the Board would have to vote to suspend the rules. The Secretary said a motion to table could be made. The President said there is a difference in allowing a person to speak to a motion and allowing them to make a presentation when there is a motion before the Board. If you want to speak for or against the motion that is what we have to deal with at this time." Eric repeated his opinion that the presentation was directly pertinent to the rotation schedule that dealt with seiners, gillnetters and trollers. Mitch spoke saying there is no rotation schedule being proposed for trolling. He made the motion to adopt that schedule and not to adopt a ten day closure for the net groups in the middle of the season. I don't think the presentation is relevant to my motion" The President said, "If someone from outside the Board wants to speak to the motion, either for or against it I am willing to take those comments." Richie asked for a clarification of which weeks presented before the Board were being considered. Mitch said it is the option that provides a build up day before each net group fishes. Richie asked "What day?" and Mitch replied that he didn't care. George, a troller, asked Chip to go back to a previous screen and said, "This is what Mitch is referring to." and Mitch agreed. "So, George said, We should address this one here." Mitch said, "Yes each net group gets a build up day and the Inlet is available for two days a week for trolling." George said, "I am going to speak in favor of this." Allen, a troller, said, "I am also going to speak in favor of this, it gives the trollers more opportunity in Deep Inlet without directly taking fish away from the seiners or the gillnetters." The President recognized a member of the public and asked him to stand. He introduced himself as Tad Fujioka the Chair of the Chum Trollers Association. He said : "Just for the record Mr. Chairman I would like to remind the Board of the long standing imbalance between the harvest..."A point of order was called... Tad continued, "and the allocation..." The President said, "Speaking to the motion?" Tad said, "Speaking to the motion we certainly recognize two days a week is twice as good as one and we certainly do appreciate that. I would like to say how few fish we actually do catch, two days is not going to make a big differencing in improving the catch." Mitch was recognized and he reminded the Board that troll opportunity exists 24 hours a day seven days a week just outside the harvest area. They get the whole season. There is no lack of opportunity. And there's also no guarantee that getting into the terminal harvest area will get them any fish, as they seem to have problems catching them at other locations. So it is possible it could get opened to the trollers, the net groups stay tied to the dock and no fish get caught. James said it is highly unlikely the seine fleet would stay tied to the dock in a year of high abundance for pinks. The chum trollers are just asking that you give us a shot for a period, a block of time, where we could see what trollers could do. We really haven't had the opportunity here." The President said, "We are getting off the subject." A troller, Alan, said "I was just going to make a point of order. We have a motion on the floor, if it gets defeated, we can look at other options." Eric asked Chip, "How many fish would this option add to the troll fleet?" Chip said, "I don't have that off the top of my head. It has been pretty low. Tad just spoke to that if the trollers go in and fish and there has been no build up then you are not as successful because it seems there needs to be a buildup of fish before... Eric asked to be recognized and said that he could count votes but thought there should have been a discussion between all the groups. He said they had tried to have discussions and he appreciated conversations he had had with the President and with Botso. He clarified that this proposal (of the chum trollers) was not his creation, that he had other ideas but having discussed it with Chip and George and trying to discuss it with Allan and Richie that it really has been a challenge to share in the hatchery bonanza. Just for example he said chums in Southeast were worth $85 million, more than all the other commercial harvest of all salmon species combined which was $71 million. It's really important that we try to figure out how trollers can catch these fish. Last year our share of NSRAA fish...I'm speaking to the motion Mr. Chairman." Kevin said, "I don't see that." Eric said he sent out a letter asking for guidance on this issue to troll leaders and one

of the strongest comments that came out was "Try to do this very carefully so you don't step on the toes of the seiners; who when you look through the allocation have given more from their share of the fish than anybody else. Their share the long term records show is about 58% of the value of the harvest and they agreed to a hatchery percentage of 44% to 49%. Gillnetters have always been around 20%. Trollers since 1975 when we started these Associations is 22%. A point of order was made by Mitch that the speaker had not touched on the schedule at Deep Inlet. Eric said, "It would be worth it to ask Chip to estimate what it would take to improve the troll share and that would be a block of time. One or two days does not work for us. The Board regulations are to try to make adjustments within the hatchery areas. Those are the rules." The President said, "That is not Quite right Eric. Eric said, You can get in to technicalities but to make this work you have to make adjustments within the terminal harvest areas. We have new production opportunities because DIPAC has bought out our cost recovery. I don't see any way that this plan as presented here significantly improves the troll percentage at a time when we are looking at a million and a half dollar bonanza. Tad has calculated the chum proposal could get the trollers... Tad, how many fish?" At this point the President said, I am going to have to stop this. I don't see how you are speaking to the motion on the floor. I understand what you are saying is that you don't like this schedule, so you are speaking against it. Eric said, "Mr. Chairman, I move to amend the motion so that we have ten days as shown in the handout from the Chum Trollers Association." James Moore seconded the motion to amend. **Motion 3/5/13 (g) Eric/James to amend the main motion to open it for 10 consecutive days of trolling.** Eric spoke in favor of the amendment and asked that Tad be allowed to answer how many fish the trollers would be projected to catch. The President said that when he spoke to Eric on the phone he did not want to "Bring all this up at the last minute and air all the dirty laundry about the allocations at the meeting. That is why an evening meeting is going to happen tonight to specifically talk about the troll and the allocation issues and where we might go down the road with that. Eric said he had proposed that this be brought up after that meeting. Mitch said Kevin if you want to have this fight right now let's do it and spend the next two days educating everyone who doesn't understand allocation and the consequences there of. If you guys think you were bored before at these meetings, get ready. The question was called again on this amendment. The amendment failed with five voting in support, 13 against and 1 abstention.

The President directed the Board back to the original motion on which he believed the question had been called. Will Bergman said, I am old at these conflicts but new on the Board maybe somebody can give me a hint about what is going to happen over the next few days as far as helping the trollers get more fish.?" Is something going to develop from tonight's meeting? I just want to have a feeling before the vote comes up on this specific thing." Mitch said "Realistically William, nothing is going to happen." The President said the purpose of the evening meeting is because last year in November he put together a meeting between the seiners and gillnetters only to discuss some issues about the DIPAC money, how things were going to change and it was a really good meeting. He thought tonight would have been a good time to talk and include the trollers. The evening meetings allow for one on one conversation and ideas get out. Nothing is official and no decisions are binding. I just thought it would be good to get everyone in the same room. Mitch might be right, that nothing will get decided but we can talk and see if there is anything we can do. There are a lot of differences of opinion. Jim said, "Mitch is right, nothing is going to happen unless there is a significant change in the Deep Inlet rotation. But I am looking forward to tonight for an in depth discussion and presentation of the facts. I just wish we could have had it earlier. The President said I am glad you got to present your plan which is acceptable or not acceptable to all of us but I don't see bringing it in at the eleventh hour as the right way to go about it and I doubt that you just figured it out last night, I have a hard time with that. Eric said, "I never saw this plan. Was that shared with any of the other Board members? This is also an eleventh hour plan." "But it gives you double the time in the Inlet, Eric" said John B. The question was called again. The President asked the Sec/Treasurer to read the motion

She said: the motion is the second scenario presented with one build up day per week for each net group; a 22.5 hr seine day and 15 hr gillnet opening. The board made the correction that the motion should read "Option 1". The Sec/ Treasurer restated the **Motion 3/5/13 (f) Mitch/Botso "The Deep Inlet rotation schedule will be Option 1, as presented, with a build up day before each net opening resulting in a 22.5 hour seine and 15 hour gillnet opening." The motion carried with 18 in favor and 5 opposed.** This option has the Saturday build up day The schedule can be viewed on the NSRAA website under www.nsraa.org/_pdfs/2013_Spring_Board_Mtg/Deep_Inlet_Schedule_2013_Final.pdf

Motion 3/5/13 (h) M/S John Barry/Mitch NSRAA Board approves the same DI rotation schedule as last year through the 27th of July. The motion was needed because the previous motion only applied to August. Board members asked for a clarification. Steve said it is the same as last year and is what Chip put up on the wall. Some Board members were confused and thought the schedule just adopted would apply in July including the additional troll day. **The motion carried with 17 in favor and 6 against.**

Sitka Sound Science Center (SSSC) - Lisa Busch, Executive Director

Lisa distributed a July to December 2012 NSRAA Update Report to the Board and Volume 2 of "Rising Tide", the SSSC Autumn Newsletter before she made her presentation.

She briefly described the teaching and research partnerships with Alaska, Longline Fisherman's Association, NOAA, UA Fisheries Technology, Monterey Aquarium and others. SSSC is a support facility for hatcheries and is in itself a hatchery. The 2012 revenue exceeded their estimates by $20,000. They received a Murdock Trust grant to improve the hatchery facility which included nets and alarms and a US/Canada Treaty grant to improve filtration. She spoke to fishermen about their close involvement and dependence on the marine resource and the role science can play in keeping the resource healthy...permanently. SSSC works with others to recruit Alaskans into marine science, fisheries and aquaculture. She detailed an impressive list of research project including the pink and chum salmon interaction project, whale predation and ocean acidification studies. She also enumerated several education and training programs. They have the only hatchery/aquaculture training program in Alaska and one of two on the whole west coast. SSSC has completed a capital improvements predevelopment plan with Rasmuson Foundation funding. As a result, the Science Center is now embarked on a $4 million dollar master plan for capital improvement to their facilities. The plan has three phases and Phase 1 is budgeted at $854,300 for new roof and exterior upgrades. Phase 1 was helped by a recent donation of $200,000 from DIPAC. A Board member asked, "Did you consider a new building?" "Yes" she said "We spent a year and a half considering it. The conclusion is to improve the historic structure which is the most cost effective alternative." SSSC has a $490,000 capital grant application under review by the Rasmuson Foundation. SSSC is developing a legislative request and actively seeking additional matching funding from other donors for the balance of Phase 1. A Board member asked about shellfish testing. Lisa said shellfish testing is part of UAS Fish Tech program and the program has been relocated from Ketchikan to Sitka, but actually testing is being done in Seward. The Treasurer asked, "Do you have a specific request? Is this one year, multi year, or what?" Lisa replied "We are focused right now on one year." She had planned to ask for $70,000. The Treasurer said, "We just finished the budget and you are in there for $100,000 in operational support, which is a good investment, but now you are asking for capital funds. It would be good to plan for annual support if that is what is being requested." Lisa said she had planned to introduce the subject and return later with a request. The President said, "We can raise the money, but it comes from the fishermen...We need to know what we are committing to, and we need to plan". A seiner said, "Please present a proposal." Lisa said she would follow up. Steve's comment was that because of Lisa's abilities and connections, tremendous progress has occurred. The President

study could be completed this month and available to the State for use at the Treaty. A seiner said there is probably little chance to achieve anything at the five year review but he is still very strongly supportive of obtaining this sort of data. **M/S Eric J/George Authorize Steve to pay $16,000 for the Chinook Futures Committee to fund the study by Dr. Dave Bernard.** The President re-iterated that although NSRAA very occasionally fund these types of requests he prefers to see it submitted in time to get onto the agenda. Another Board member recalled a Board vote / policy that financial requests should be submitted to GM at least two weeks in advance. The Treasurer said NSRAA should work with Howard on the best option for CFC for payment to Dr. Bernard. Options included pay CFC, pay Dr. Bernard directly or reimburse CFC. The VP asked the maker of the motion to restate the motion: **Motion 3/5/13 (e) M/S Eric J/George: To authorize Steve to pay up to $16,000 for the Dr. Bernard study, as he saw best.** Both the maker of the motion and Howard agreed to the newly-stated motion. **The motion carried unanimously on a roll call vote with 25 in favor.** A seiner said, "Yes, there may be future requests for funding for treaty issues." The President asked for a report back on the results and a copy of the results.

Deep Inlet Harvest Plan.
Chip Blair NSRAA Data Analyst

Chip opened his presentation by remarking that he thought there was a typo in allocating 2.5 hours of time for discussion of this agenda item. Chip will present what staff thought was the best option first and then there are other options that can be presented as alternatives. To get started, Chip directed the Boards attention to Tab 10 page 85 of the Board book. The Cost Recovery goal for this year is $1.86 million dollars at Deep inlet. Without DIPACs $1.5 million contribution NSRAA would be looking at harvesting 20-30 percent of the Deep Inlet return for cost recovery. The poor coho return last year and the lack of forward funding from that source, the increase in fish food prices and the discrepancy in planned SET tax revenue to NSRAA all combined and NSRAA is still facing a cost recovery goal of $368,000 or 300 to 450 K (thousand) lbs or 35-65 K chums needed to balance the budget. The chum return is forecast for 1.3 million fish (strong three year old component). The budget committee recommendation is not to close Deep Inlet at all this year for Cost Recovery, but to conduct CR fishing outside the bay. This is essentially the plan that worked so well last year and is the starting point for this discussion. There could be surplus in Silver Bay or opportunities for CR in the normal areas where we fish. The broodstock goal is 70,000 fish. Last year that many fish just barely squeaked by and made it to Bear Cove and we are hoping the fish will do that again this year. Staff is hoping enough fish will make it to provide for surplus brood stock but if broodstock is needed the reopening plan is to reopen with single troll day the 1st day after the area is re-opened with a minimum of 24 hours notice and preferably 48 hrs so boats farther away can plan to participate. Last year staff said they will attempt to close after a gillnet day and then reopen (after troll) with a seine day and adjust the schedule as needed to maintain the 1 to 1 ratio between the net groups. All of this is status quo and exactly the same plan as we had last season. This year, the 1st of June is on a Saturday and the Chinook management is up until the 3rd Sunday of June, so there are three weeks of fishing under Chinook management. The first opening under Chinook salmon management for 2013 will be May 26th . Chip refers to the calendar schedule on the wall for the Board. The blue days are seine days and the green days are gillnet days and the troll Saturdays are a orange color. Under Chinook management the nets are on a 2:1 ratio and then go to a 1:1 ratio with 3 days gillnet, three days seine for the chum season July, Aug and Sept. This worked well last year. Chip said he was done with his presentation.

Kevin explained a little more about the DIPAC donation to cover cost recovery at Deep Inlet. The DIPAC Board was given the original $1.5 million projected expense figure but for the

PROOF OF 1.5 MILLION DOLLAR CONTRIBUTION TO ELIMINATE COST RECOVERY IN DEEP INL FROM 2013 SPRING NSRAA BOARD MEETING

public was really important and was not in favor of teleconferencing. The President summarized by stating that NSRAA will continue forward with both options available to the Board and the public.

The Board left for lunch at 11:45 and resumed at 1:15pm with all Board members in attendance.

DIPAC Funding - Eric Prestegard, Executive Director

DIPAC is out of debt as of December, having paid back $42 million dollars to the State, due to great survival and increased chum returns and is now in a position to financially assist NSRAA with cost recovery expenses. NSRAA's past assistance to DIPAC has been greatly appreciated. DIPAC is donating $1.5 million dollars to offset NSRAA cost recovery expenses at Deep Inlet this year! DIPAC total contribution to the fisheries this year is $1.5 million dollars in direct assistance and $500,000 dollars, approximately, in enhancement taxes on fish caught that were produced at DIPAC facilities (formerly a joint program with NSRAA). This donation is quite significant and represents a third of NSRAA's $6 million dollar budget and an increase in fishing opportunities to the fleets made possible by the elimination of cost recovery closures. The President, Kevin McDougall relayed how he had asked the DIPAC Board several years ago to consider options for assisting fishermen when the organization finally got into the black. Eric J reminisced about Ladd Macaulay's years of vision and leadership at DIPAC. Steve's opinion was, "If it wasn't for Kevin taking the initiative to move this forward with the DIPAC Board this donation would have never occurred at this time. It was very fun and enjoyable to work with Eric Prestegard and Kevin." The Treasurer remarked that in a few short years, between implementation of the new HF tax assessment program and now the DIPAC contribution; NSRAA has completely gotten rid of cost recovery. This is a huge benefit to fishermen. A fisherman asked about the current composition of the DIPAC Board, "Is the Board the same, are the officers the same?" Eric P said they are changing the Board from 32 members, down to 24 in size and also adopted some bylaws changes so they will have 4 seine, 4 troll and 4 gillnet seats. The DIPAC Board Chairman is Sandy Williams. Kevin thought it would be good to have a regular presence at the DIPAC board. At least to report to their Board on how NSRAA utilized the contribution. Kevin thought the most likely liaison to DIPAC is the General Manager. Steve said he and Eric will draw up a one page cooperative agreement document about the $1.5 million contribution.

Chinook Futures Coalition (CFC)

Howard Pendell Northern Panel Troll Representative Pacific Salmon Commission

Howard summarized the purpose of the CFC and history of some of the actions at the Treaty. The State of Alaska "Got bullied into a 15% cut over the entire abundance based formula used to set the annual catch allocation to the Alaska fisheries. This 15% reduction will remain in place for 10 years unless appealed at the five year meeting, which is coming up. CFC goal is to raise funds to strengthen arguments to eliminate the 15% cut and to go back to formula originally agreed to." Howard said the State needs help in Washington DC (politically) and stronger scientific arguments to be made at the Chinook Technical Committee. Currently the Endangered Species Act (NMFS) is being used to intimidate Alaska into giving up access to healthy and rebuilt returns of Chinook salmon. Howard is requesting NSRAA to make a $16,000 donation to CFC to pay for a scientific study by Dr. Dave Bernard which would evaluate the status of Chinook stock(s) as to whether or not they are being correctly represented as endangered, when in actuality the stock(s) may be rebuilt and achieving adequate escapements. NSRAA has long been involved with aspects of the Treaty and the rebuilding programs. The original mitigation programs came from the Treaty; like the Medvejie chinook enhancement programs. $15 million in Federal funding has come to Alaska for mitigation but none of it is available for the type of things CFC is trying to do. It is half of the $30 million that the other countries get. The

Chum Trollers Association

To promote and improve Alaska chum salmon harvest for all trollers.

Kevin McDougall NSRAA Chairman & NSRAA Board
1308 SMC Road
Sitka AK 99835

March 5 2013

Whereas the troll fleet has been well behind our allocation of SE Enhanced Salmon as specified in 5 AAC 33.364 for nearly 2 decades, and

Whereas NSRAA is a major producer of SE enhanced salmon and as such, compliance with 5 AAC 33.364 will require that the troll share of NSRAA salmon be reasonably close to the range laid out in that regulation (27-32%), and

Whereas over the last five years, the average troll share of the NSRAA value of 18% has been well below this range, and

Whereas 5 AAC 33.364 mandates that such imbalances be remedied by adjustments of fishing time in terminal harvest areas, and

Whereas the Deep Inlet August chum return is the only NSRAA terminal area fishery in which meaningful improvements in troll share could be made by the NSRAA board for the 2013 season,

The CTA requests that NSRAA make increasing the troll share of Deep Inlet chum a priority.

We recognize that there are many ways in which this goal could be approached. We are open to consideration of any of these means as steps towards reaching our long-term goal of the fair and reasonable distribution established by 5 AAC 33.364.

As an example of a plan that would have minimal adverse impacts on the other users, the CTA suggests that the 10 Saturdays prior to August 31- days that have traditionally been designated as troll opportunity in the THA, be consolidated into a single block of 10 days beginning August 8th and ending August 17th. These dates were chosen to coincide with the traditional cost-recovery closure of the THA, (which we understand will not be needed this year) and hence this plan will not result in any reduction to net opportunity or harvest compared to typical year with a normal cost recovery closure. Actually, by forgoing our chum opportunities earlier in the year, this plan would give the gillnet and seine fleets more fishing time and more fish than under the historic norms. These dates also are the ones most likely to minimize the length of a troll opening needed to achieve a specific harvest level, as they overlap the probable dates of the troll coho closure, which precipitates the largest troll chum fleet.

While it is our goal to eliminate the allocation imbalance as quickly as possible, we realize that it is impractical to do so in a single year. Furthermore, we recognize that NSRAA bears only partial responsibility for the imbalance, and it is thus unreasonable to expect the entire solution to come from NSRAA without the other major hatcheries also contributing to the solution.

With all of the above in mind, we ask the NSRAA board to adopt our example plan or some other having a similar likelihood of achieving this level of increase of the troll share of Deep Inlet chum.

Thank you,

Chum Trollers Association

Below are answers to some questions that you might have about our why we chose the specific plan that we did:

Q: Why are trollers concerned with chum? Why not focus on kings or coho?

A: We would like to increase the troll harvest of all three species. Of the three though, chum are economically dominant. Over the past 5 years, chum have averaged more than 3/4 of the total value of NSRAA commercial fish. It is not possible for trollers to reach our allocation range without significant chum harvest.

Q: How many fish do you figure the troll fleet will catch in ten days?

A: Until we have the chance to actually fish for an extended period of time in the THA it is not possible to know with any degree of precision. Our figures are inherently approximations based on forecasts and assumptions. However, it is our tentative guess that based on a 1.4M fish return, an opening from August 8-17 would allow the troll fleet to catch 120,000 additional chum salmon between the THA and the improved fishing in the traditional Sitka Sound fishery. Based on projections by NSRAA staff, this would increase our share of the NSRAA value from 19.5% to 24% or half of the way to the midpoint (28.8%) of our allocation range. This would result in an increase in the troll share of the overall SE Enhanced value by about 1-1/2%. While this is but a small improvement, it is a significant step in the right direction for 2013. *(Note the estimated additional catch figure has been corrected from 250,000 in the original letter.)*

Q: Why 10 days?

A: NSRAA staff has estimated that based on past history the troll share of NSRAA fish will be 19.5%. This would leave us about 9% short of the midpoint of our allocation range (28.8%). The ten day length was selected as our estimate of how long it would take the troll fleet to make up 1/2 of that estimated shortfall of NSRAA value. While certainly we have no objections to a longer opening, making up half of the shortfall in 2013 seemed like a reasonable-sized step. An opening significantly shorter than 10 days would not provide enough time for fish to accumulate in the THA thus would fail to provide for a successful trolling opportunity.

Q: Why August 8-17?

A: These dates were selected to coincide with the estimated time of the coho troll closure. However as the timing of the coho closure is uncertain, we are not opposed to altering these dates slightly. For instance if another gear group preferred, the opening could end on Wednesday the 14th or Sunday the 18th instead.

Q: Why the trade the10 Saturdays from June 22 to August 24 instead of different Saturdays?

A: June 22 will be the first Saturday in Deep Inlet under chum management. Prior to this time the area is managed for Chinook. It would be unnecessarily controversial within the troll fleet to trade Chinook access for chum access. Similarly, by August 31 the coho should be starting to show up in Deep Inlet and we are interested in maintaining access to this opportunity as well.

Q: The allocation range is only applicable to the entire SE region, not to NSRAA specifically. Why do you think that trollers need to be within this range for NSRAA?

A: We are aware that 5 AAC 33.364 only addresses the overall allocation, however NSRAA is a major component of the overall SE enhanced salmon picture. If our share of NSRAA fish is not at least close to the range, it would require our share of either DIPAC or SSRAA fish to be well above the range. While we are open to the concept of a multi-hatchery management plan that would provide for this, until it has been approved the most straightforward solution to the allocation puzzle is for each hatchery to carry their own weight.

Q: There has been very little harvest or effort of chum salmon by in the Saturdays that the troll fleet has been allowed to fish for chum in Deep Inlet in past years. If chum haven't bitten there in the past, why will this plan make any different?

A: Troll gear is an effective means to harvest chum salmon, but only when the fish are fairly concentrated. The past practice of single isolated troll days in the THA that followed 6 days of net fishing did not allow the chum to build to the levels conducive to good trolling. An extended troll opening will allow this to happen as we have seen during the past times when the troll fleet had 1 or 2 day openings in Deep Inlet immediately following the cost-recovery period.

Q: Why should the seine fleet have to accept fewer fish in 2013? The seine fleet is also behind their allocation range (though only by a fraction of the amount that the troll fleet is behind).

A: Neither the seine fleet nor gillnet fleet will catch any fewer fish under this plan that they would in a normal year with a normal cost-recovery closure. The unique opportunity presented to NSRAA by DIPAC this year allows the organization to free up $1.5M worth of fish that would ordinarily have been captured for cost-recovery. This is essentially new production. It is entirely appropriate that the fruits of new production be shared by the gear groups that are behind their allocation ranges. Trollers are much further behind than seiners and thus trollers should be given the opportunity to harvest the lion's share of these fish.

Q: By allowing the fish to stack up without regular net harvests, the fish will mature and darken. Won't this cause loss of value?

A: In kings and cohos this certainly could be a concern. However chum markets value the eggs at least as highly as the meat. While the flesh value falls as the fish mature, the egg value increases as fast or faster. NSRAA has benefited from this pattern in the past as the price that NSRAA receives for dark cost-recovery chum is typically much higher than dock price of the brighter common property fish. The opposite is true for kings and coho which have much less valuable roe.

Q: Why is CTA making this an issue now? There are several new NSRAA projects in various stages of development. Why not wait until new production comes on line?

A: Trollers have been behind their allocation range for decades during which time we have been told that new production to benefit trollers is right around the corner. We have patiently waited for this to occur for many years and have repeatedly been disappointed. The offer from DIPAC to subsidize NSRAA cost recovery is the functionally the same as new production. Given the disappointingly slow track record of NSRAA projects we want to ensure that we get our share of the 2013 run. When the new production does finally appear it will reduce the amount of Deep Inlet chum that will be required to get trollers to our allotment. We are not staking any permanent claim to these fish, only asking for our fair share of the actual production in any given year.

Southeast Enhanced Salmon Allocation Workshop
December 9-10, 2009
Centennial Hall, Juneau

(These meeting notes are a summary of the discussion captured as best as could be but is not an exact transcription. KLH)

In attendance at the meeting sometime during the workshop: Flip Pryor, Bert Lewis, Scott Kelley, Steve Reifenstuhl, Eric Prestegard, Jim Becker, Chris Knight, Jeff McKean, Susan Doherty, Pete Esquiro, John Burke, Linda Danner, Danny Pardee, Ed Hansen, Kathy Hansen, Cheyne Blough, Richard Eliason, Mike Round, Ron Josephson, Rudy Franulovich, Kevin McDougall, Lon Garrison, Chip Blair, Dave Otte, John Peckham, Sam Rabung, Mitch Eide, Dale Kelley, Jev Shelton, and Tim Grussendorf

The meeting was called to order following the adjournment of the Joint RPT meeting at 2:45 pm. First item discussed was who should chair the meeting. The agreement was to have Flip Pryor to continue to chair the allocation meeting as some saw this meeting as an outgrowth of the RPT process. Next was discussed what type of meeting notes /minutes and who would be responsible was discussed. Hansen volunteered to take the notes. She felt it was important to have one set of notes that are the same for all participants and associations to work from. McDougall summed it up in that he appreciated anyone taking notes so he didn't have to.

INTENT OF THE MEETING:
Flip said that a rough agenda was put together for the meeting (included as attachment). Included in the agenda is the paragraph from the industry consensus that Flip thought summed up the purpose of this meeting. Peckham saw the intent of this meeting to be a very narrow focus and if people are interested in talking about the plan itself, that should be at the end of the meeting if discussed. Kevin felt the industry consensus wasn't that narrow of a focus but the intent was ways to manage the allocation among ourselves without having to go to the Board of Fish. He mentioned last spring that he would like this group to visit the five-year rolling average but felt that these all deal with management and so thought it was part of the discussion. D Kelley said that she wasn't sure what this workshop is all about, changing the allocation numbers, or how to get all gear groups in balance? McDougall asked to address D Kelley's comments. The trollers have been out, they hear about it at every NSRAA meeting but this came about mainly due to the inequity between the net groups. RPT and NSRAA have both tried to do things to bring the trollers into their allocation range, we wouldn't be having this workshop if it wasn't because of the net situation but he didn't plan to leave the trollers out of the discussion. D Kelley commented that rotational fisheries still affect ALL gear groups so they must all be considered. Danner said that we need to keep all ideas on the table. McDougall clarified that in the industry consensus there was an agreement to not consider allocation percentage ranges. Peckham said obvious there is some disagreement on the intent of the meeting. One thing for sure, it is easier to deal with the net fisheries

EVIDENCE OF BEING AWARE OF THE PROBLEM BUT UNCONCERNED UNTIL THE NET GROUPS ARE HURTING.

THE FUTURE IS NOW. 366 TROLLERS O
ROUND CHUM IN 2013. THATS THE FLEET.

but troll should be considered especially as trollers target chum trolling more in the future but he saw the workshop as having a narrower focus but can live with going forward with what has been discussed. Not change the plan in regulation. Eliason asked if we plan to take the long way or the short way to addressing the problem. Changing the rotation didn't affect the plan. McDougall said anything going forward changes the plan, changing the one to one rotational fishery in a THA changed the plan and several said no, it didn't change the plan. Pryor passed out the handouts from agenda item #3 (included as attachments). This included the Industry Consensus letter with Board of Fish and Follow up actions noted in Bold and a copy of the Southeastern Alaska Area Enhanced Salmon Allocation Management Plan and findings. Passing out these handouts covers agenda item number 3 to review background information. McDougall asked a question how in PWS they have already come out with the 2010 regulations even though the numbers for 2009 couldn't be ready. Lewis answered that it was based on the 5 year rolling average of 2003-'08. Peckham said that his idea of the intent is in agenda. Look at the forward looking model, '09 preliminary numbers, new production in the works, and does PWS have applicability to SE and then get feedback on the options. At the spring meeting look at allocation numbers and proposals for the Board of Fish would need to be before the RPT in the fall of 2010. Hope some ideas come forward that we can give to the hatchery operators to review. Look at the allocation situation in the spring as we normally do and then decide if we will be recommending any short or long term changes to take to the Board of Fish McDougall commented that some had wondered about the tone of the meeting was going to be and asked is there a problem with the plan and how it works, is it effective, is there something better? Is it good enough and gear groups are just out of the their range, but maybe the reality is different now that 15 years have gone by since the plan was adopted. Pryor suggested we think about and look at the plan in place, says the plan laid out certain ways to deal with being out of range and now that we have to make adjustments, evaluate if the plan will work before you create something new. Peckham said we have been dealing with this over the years, it's not a perfect plan, there is a place to review the enhanced allocation plan but not at this meeting. This is about is there a way to change THA's w/o the Board of Fish process. Not ready to commit to changing the plan and not sure how you would go about it. Blough asked these are short term adjustments, at what point do we start discuss new ideas that might have some new foresight. We were given a review of the PWS plan which gave us a broader view, new example, new ideas and make something work. The Board of Fish thinks they have figured it out in PWS. We don't want to be at the Board of Fish without having had the discussion otherwise we will be back at the Board of Fish with different plans from each of the gear groups. McDougall said we are here because we came up with the industry consensus but it doesn't mean that we still aren't at odds with each other and we could leave it up to the Board of Fish. But would rather work with a small group and see if we can agree to something otherwise we will have our two minutes in front of the Board to testify and then they will decide for us. We need to allow all ideas to come to the table that are workable and that entails listening to the options. Kevin stated that he talked to a lot of people about this issue before this meeting and there were no real clear ideas he heard about. The Board of Fish suggested we look at PWS, it's an opportunity to look at something new and we should. McKean said we should look at the model, the '09 preliminary numbers and then use tomorrow to discuss outside the box ideas. Peckham,

AGAINST 175

ACKNOWLEDGEMENT OF NEETS BAY CHUM TROLLERS SUCCESS.

their enhanced allocation what happens. Blough said that the troll fleet with the current prices can't seem to get within their allocation and the success of Neets shows that the only hope of trollers getting within range is to shift to production of chums and allow trollers access. Looking at a budget reduction will force the trollers to look at projects that will provide the biggest bang for the buck. Blough said that he thought the majority of the budget at SSRAA also is spent on coho and kings but the trollers also are starting to want directed chum fishery but you can't have it both ways. This would change the associations into a better business making better decisions for the value of their money. Trollers right now appear to be split in two factions and you can't ask for troll access to chums and spend the majority of the association's funds on coho and Chinooks. Otte doesn't believe that trollers get the lion's share of the budget because SSRAA doesn't build a project for one particular gear group so you can't say who is getting the lion share of the budget. Maybe SSRAA is more unique but their projects other than Kendrick aren't dedicated; they try to make projects that are caught in the common property fisheries. How does an association determine amount spent on each gear group? Blough asked how SSRAA's budget section works, look at the numbers for SSRAA and not everyone is within their range. Not trying to change anything at SSRAA but allows a gear group in the situation like at NSRAA a tool to use but NSRAA is not a happy family. Otte has 2 questions – how do you require and determine portions of the budget and how would the RPT enforce budget numbers. With the word require you are getting into SSRAA's business. Blough said that this is the dialogue he is looking for. First time he has had any feedback from the trollers. He goes down and catches SSRAA coho and with a review SSRAA might say everything is fine and might not want to change anything. On the RPT side, the southern RPT will have their own meeting and if there were issues that's where it would go to be worked out. Blough can't tell what DIPAC what to do (they don't receive tax $) and NSRAA can't do anything because of the SE wide enhanced allocation plan. If there was direct guidelines and thinks would be able to work it out at the association board level and doesn't think would ever have to go to the RPT or Board of Fish if his plan was in place. Knight asked does anyone see any benefit in splitting the allocation between the north and south ends. Burke commented that one complication is the majority of fish like cohos raised by SSRAA are caught in the northern end. Blough said he was all over Southeast this year and heard from a lot of fishermen and in the south end heard that the North end is the problem and said this plan is a starting point so each association can deal with their own problems. Knight asked if there are any advantages or disadvantages to splitting the north and south other than spending issues other than Blough's point of view. Franulovich said he knows SSRAA split of fish to different gear groups but what is the NSRAA split percentage wise. Blough said he heard don't want to change percentages, got that as loud and clear as the north/south issue and pointed out that if you want more than your share, this plan is not for you. Franulovich what is the share of fish at NSRAA. Are you looking at just '09 or over time? Otte said take Neets Bay, it's our biggest coho and chum project and is already split among the gear groups, how would you figure out what share of the budget is for each group. Blough said if someone wanted to let a project die and someone wanted to keep the project then it becomes their project as part of their allocation range. Cost recovery comes out of everyone's share of their allocation range. As the fish return each group would have their own projects and there would be some overlap such as trollers

RECOGNITION OF NSRAA & DIPAC FAILURES FOR TROLLERS

catching chums in Eastern Channel and the gillnet and seine fleet cleaning up some of the Chinook in Deep Inlet. The RPT shouldn't need to review projects but is there for when there is a disagreement. Otte said SSRAA doesn't build projects for a specific gear group, we just build projects. Neck Lake was assumed going in to be a troll project and it ended up being a gillnet project. Blough said that SSRAA has a different philosophy; he's just trying to empower each association. Perfectly comfortable electing association board directors and it would be each association that would be doing their own decisions without being affected by the region wide enhanced allocation situation. DIPAC is causing problems in the south end due to their success in raising chums that was never envisioned.

DEMONSTRATES THE WILLING of the board AT SSRAA for "FAIR & REASONABLE" SHARING.

BREAK

Peckham asked what's the chairman's plan. Pryor said further discussion on this topic, or we could move on to agenda item #7 and he had been requested to allow Danner speak on behalf of the Chum Trollers Association. Peckham said he hates to be in the position to defending the current SE enhanced allocation plan but that is the position he is in. Seiners are not getting their share of SSRAA fish but had considered it balanced out. You can't get away from arguing/discussing allocation and you aren't going to be in a position to not argue and he can't see taking DIPAC out of the equation. When the seiners were on the high side and DIPAC was drawing all the boats up north, SSRAA put fish in Anita Bay to help keep part of the gillnet fleet down south and it wasn't in the seiners best interest to put fish there but they couldn't argue because they were out on the high side and the other fleets weren't. Troll access to Neets Bay complicates SSRAA life but we do it because the trollers our out but within just SSRAA the trollers are within their allocation range. At SSRAA the trollers are within their range and Blough's plan would start battles in SSRAA immediately since the seiners are out of their range and if you looked at NSRAA there would be arguments for gillnet projects. There are problems with the current enhanced salmon allocation plan especially since there is no easy way to get trollers within their range but the joint RPT and associations have been working with the plan and RPT has supported coho projects for trollers and board of fish proposals. Industry consensus was a reasonable approach. If we keep the current plan you need to use common sense in implementing the current plan. There is more involved such as fishing patterns, expectations, upcoming production; you can make arguments over anything or you can attempt to make it work and probably some of the efforts have helped. Don't think there was an industry consensus to review the current plan at this meeting. Know the seiners and trollers didn't expect the plan to be reviewed. Knight asked what the reason for the workshop was if not to look at the current plan, otherwise there is no impetus to be here. He also asked Burke how much change in production since the original plan was put together. PWS has made changes to their plans four times already. We are fighting over an old plan and working with the system that most of this production wasn't considered. Burke answered that the meeting was in the early 1990's and had to find some way to get a baseline since the treaty had affected the gear groups starting in 1985 but had especially affected the trollers. A break was made in developing a consensus when it was figured out that you didn't have to equal 100% at the mid-point and no we didn't know at the time what production would be successful or not. Burke

said some of the productions existed such as Hidden Falls but DIPAC chum production wasn't envisioned and more was expected from Snettisham. There was an expectation that there would be 100,000 Chinook harvested and in the trollers holds. Have to consider the effect of the treaty on the troll fleet and one of the goals was to help the troll fleet but has been diluted over time. Knight said we have had difficulty getting trollers within their range. Now is the time to sit down and work together. Blough responded to Peckham that he said it was not a big enough problem to change the current plan but when one gear group at least is complaining there is a big problem and challenge everyone to bring their experience to the table and work for a solution. Blough also asked how the PWS presentation came about. Hansen answered that in talking to Board of Fish members in particular Mel Morris she had been encouraged to look at the PWS plan as a Board of Fish framework that they could accept in a plan and brought the issue to the RPT and that is how the presentation was arranged. D. Kelley said she didn't know what to expect from this meeting and if she had thought that the current plan and process was under review she would have checked with her board. She wasn't clear what the goals were even after reviewing the materials. ATA agreed to the industry consensus and thought this meeting was more about how to better get at achieving the current goals. If the plan was to do something more there should have been adequate notice provided so people can come prepared to comprehensively discuss the issue. Came prepared and looking forward to the discussion of how you might make changes to the THA. A lot of history went into developing the plan and has been built upon by Board of Fish actions, treaty actions, mitigation funding and decisions made by associations. The mom and pop hatcheries have received money from the regional associations so how do you not consider them within the plan. Blough reminded the group that the actions taken by the board of fish and the industry consensus will sunset. My understanding was that we are charged with coming up with another consensus. D. Kelley said she wasn't prepared for this. Blough asked when is the time we make a decision to work on this. Eliason said he was here because he did not agree with the industry consensus agreement and doesn't think that his gear group totally agrees with it anymore either. Bottom line we are going back to the Board of Fish. Bottom line left is to carve time from Nakat. D. Kelley said that this discussion isn't what was noticed in the news release. Eliason moving forward and doesn't want to be bound by the industry consensus. McDougall suggested new idea thrown on the table and explore it at the end of the meeting coming up to under #7 and see if there is interest in bringing in new ideas. Eide said it yesterday that this is the place to look at new ideas but we also need to look at the reasons we are here for. Agenda item #7 we were charged with to look at and need to look at before the afternoon is over. He stated he is not convinced that PWS plan is going to work. Might have to review every five years and look at new ideas at the end of the meeting. Becker agreed with Kevin and said that the original plan took 3 years to develop even with PWS coming down and providing information. At this meeting we need to agree to review the enhanced allocation plan at another time, even if working fine, still need to review after 15 years with the production you have now. One gear group is obviously dissatisfied. Peckham didn't want a decision to be made here. Blough asked if there would be a decision today to discuss this sometime. McDougall suggested that we could decide to have the meeting to review the plan sometime today.

ARGUMENT FOR 176. THE HATCHERY BOARDS SUBMIT PLANS TO BOF.

SHA CHANGES WITHOUT BOARD OF FISH REVIEW:

Pryor stated there had been previous talk about using trigger points that could be taken to the board of fish. Knight asked about new production. McDougall if we came to an agreement we would want the Board of Fish to allow us to make the SHA changes and if that could even be done and if we made a modification to the plan would we have the authority given to us to do and we need to figure out what we would want to be able to do and if it's a modification to the plan, how do we do it. Hansen answered that she thought that was partly why the Board of Fish members had suggested reviewing the PWS plan to show the type of framework that they would be comfortable with approving that is then automatically done by ADFG according to the plan/triggers. Knight asked if we have looked at a piggy back area or would a new release site for a piggy bank area be developed. Garrison pointed out that new production sites are hard to find and a long way down the road. For current production only one site for us (NSRAA) would work as a piggy bank and that is Deep Inlet. Eide said that any piggy bank area would go the trollers forever and probably still wouldn't get within their allocation range. McDougall pointed out that with PWS it was only two gear groups to deal with and if we incorporate the trollers into the plan we have three groups to consider. We kind of made Anita Bay and Deep Inlet as a de-facto piggy banks at the Board of Fish meeting. Otte stated that a piggy bank wasn't really going to work for trollers. For chums, THA's are usually too small and don't work and if the fish aren't biting, they aren't biting. McDougall said that with two gear groups it's easy to adjust to get them within their range but more difficult with three and does it go to trollers even if it doesn't benefit them. McDougall went on to ask the trollers how they think they fit into the allocation plan and what are their suggestions. Danner took this opportunity to present a handout from the Chum Trollers Association which she then spoke to, had 19 different idea and not burden by reading every one. Six of the items listed are future board of fish proposals; others are ideas for ADFG and the hatchery associations. All trollers have concerns and not just the chum trollers. From the chum trollers you won't hear that the trollers can't get within their range, we just need the opportunities. You can find fault with any ideas but many can be made to work. The first ½ of the page are general ideas and the last ½ is who is qualified to address the issue, everyone take the ideas back and kick them around and hear what the complaints are. Not going to be able to address everything because I will also have to go back to my board. McDougall asked Otte what's happening with trollers in the south end and on the SSRAA board regarding THA's. Otte, not sure how changing SHA would help the trollers per se. SSRAA figured out Neets Bay in combination with Nakat and Anita Bay and Kendrick. Anita Bay is too small of a THA but access fish in District 8 on non-gillnet days, you could probably make a fishery but right now trollers can only fish on gillnet days. It would help to fish beyond the 20th of September to support more coho harvest and the problem with Neets Bay coho is that the stock is so late that they are still off Sitka when the fishery closes on Sept 15th and it would be nice to be able to access those fish longer. Eliason asked on the chum trollers list they ask for more Neets Bay chum and why aren't the trollers asking for more chums at Neets Bay. Otte answered that broodstock and all the cost recovery comes from Neets Bay and if there are fish left over then a fishery for the trollers up to 200,000 fish is allowed and the determination of the fishery is part of the board process. Eliason asked why not allow more and take cost recovery somewhere else. Otte, SSRAA doesn't have any reserve

EVIDENCE of SUGGESTIONS & PROPOSALS DATING back AT LEAST TO 2009. (SEE ATTACHED LIST OF 19 IDEAS, PROPOSALS.)

funds so to do that we would have to borrow money if we forego cost recovery to allow the troll fishery; we were choking on our debt and have been taking everything we can to pay down the debt. Blough asked Burke if you were to go over the past years and what amount is returned to common property fisheries and how much is taken in cost recovery. Burke, every year, we provide the figures to the SSRAA Board on how much of each project is returned to whom. You can look at coho; maybe a project on the outside you could do a project with cost recovery as part of the program. SSRAA has up to a 95% interception rate on coho. Burke gave some numbers on individual fisheries return. Blough asked if he understood correctly that the debt has taken priority over common property contributions and the response was that was probably a valid comment back in the late 1990's. We haven't had a lot of extra funds. Burke said a mechanism was set up to allow the trollers in Neets Bay and there has been some discussion about having a net rotation at some point in time. When we have the opportunity we will provide more opportunities at Neets Bay. SSRAA has stepped forward with new programs/production and you have to keep in mind that SSRAA releases more than 50% of their chum at other release site than Neets without any cost recovery on those projects and that 60-70% of the chums is going back to the fishermen.

Peckham said he is trying to figure out if SSRAA could determine the rotation for example at Anita Bay. Can the Board of Fish allow SSRAA or the JRPT to determine the rotation? Hansen answered this is really a question for the Dept of Law. Regional rotations can be set up but not the THA site. Was looking at an old set of minutes from right after the enhanced allocation plan was passed and this question was asked and it appears from what took place that the answer is no. You have the possibility maybe to do rotational schedules but I don't think that the Board will ever pass on additional authority unless it is developed like a plan in PWS with triggers that is determined by the Board of Fish. Peckham asked S. Kelley if he thought that was an accurate picture. Yes. S. Kelley stated that if the group wanted to ask law dept a question that he could pass it on but would want the question made very clear and a description of what you want. In some cases the SHA will open up to all gear groups from a certain date and ADFG has reluctantly moved it earlier but has asked that in the future the association submit a board of fish proposal. They do this under their EO authority but they do it to keep the area cleaned up. Peckham wanted to hear the ideas and list out any options but he is not hearing any support for changes which would leave it to submitting board of fish proposals every three years. Seems like there is three choices 1.) Status Quo; 2.) Let the association decide rotations – and would that be within a range or trigger points; but maybe the association wouldn't want the authority 3.) Recommendations of the JRPT based on their current understanding of the allocation plan. McDougall said would the status quo be with or without the current changes made by the board (before or after the sunset date). Peckham said if we don't do anything else, the joint RPT will have to evaluate the current allocation status and may make Board of Fish recommendations or proposals before the deadline. McDougall questioned if you gave the associations the authority to make THA rotation changes how do you make it work with two regional associations within Southeast; someone will say it's not our responsibility. He can see it happening that each assoc will say let the other assoc worry about it so without separation of the two associations it wouldn't work. The NSRAA board doesn't like to talk about

Why WE ARE APPEALING [illegible]

allocation. Who does make the decision then and it was said the Board of Fish. Within the THA you can tweak things a little. McDougall said from his perspective it was brought up at the spring meeting that he had an issue with the five year rolling averages causing wide swings and personally doesn't want to wait but would like to adjust things yearly. Don't see an avenue to make THA model work; there are only so many places that actually make a change between the gear groups. At some point we need to discuss the chum trollers list. Some will be doable, some are impossible, a lot have NSRAA's name on them. Burke suggested that the individual boards could address with suggested trigger point working with the model. McDougall said have the RPT make the recommendations at NSRAA they don't like to talk about allocation. Burke suggested it should be the opposite way by having the RPT ask the Association boards to make trigger points for THA to bring back into the allocation by providing opportunity and achieving goals. Peckham said the PWS model put in trigger points. If NSRAA or SSRAA boards don't agree then go to the Board of Fish, but not all THA should be considered and the RPT should agree which ones would be appropriate. McDougall asked if it is the opportunity you are providing or to actually achieve the allocation, they are two different things. Have issues on the north end, they might be solvable, don't know the south end issues but looked at the numbers and it looks like some changes would need to be made. There is a big percentage swing that SSRAA would have to make in order to get within the ranges. What is realistic? Burke said that you have new production and most of SSRAA fish aren't caught in THA but caught in the common property fisheries. Blough said that NSRAA and SSRAA are so different in how they function and that is why we should consider splitting the northern and southern areas apart. Grussendorf said that is what I've been thinking that we should split the areas apart. In Deep Inlet, took big cuts on the gillnet fleet and during the season thought was making up ground but then looked at the southern end numbers and we might have lost ground. You do new production and get a gear group in range and then they shoot up. Now, you continue the production and then what do you do. A five year rolling average is too short it should be a ten year rolling average. Blough said that the process needs to bring divorce papers to the table for NSRAA & SSRAA. Pryor asked if there were other comments about the SHA options. Peckham suggested that another option would be to look at the two regional associations to work together for a bank area such as Port Malmesbury or the West Coast of Craig. It was asked for DIPAC to look for troll harvest areas. Area 15C is open 7 days a week. Also area 12 is open. Knight (President of DIPAC board) said that he has talked to Eric Jordan and pointed out some possible areas such as WM Henry Bay. How do you force the troll fleet to fish the area, you need the motivation to look for the drags. There is an intricate agreement for the SHA with the land owners. I'm only one of 32 members of the board. Prestegard wasn't here when they were developed but said when the Gastineau and Amalga SHA were developed it was with the thought there would be no commercial fisheries. S. Kelley said that ADFG has had calls complaining with just a single seiner or two fishing in Gastineau doing cost recovery. Knight pointed out that the DIPAC board has also been focusing on paying down their debt over the last four years while the good returns have been coming back. We have reduced the debt from 28M to 18M. Return next year is lower and may put us on the borderline of whether we are going to be able to make a payment. Pryor, we've been talking about conceptual ideas so far, is it is worth coming back after lunch for more discussion? McDougall yes, we should

IN SUPPORT of 176.

ARGUMENT AGAINST PROPOSAL 230.

board of fish proposals are due. Peckham said that with public meetings a review of the plan would go through and past the time for Board of Fish proposals. McDougall said right now nobody is on the same page and the current regulations sunset and there will be different gear group proposals and what will the Board of Fish say, tasked with looking at the industry consensus and didn't get anywhere and then will ask "did you review the plan as part of the process?" Burke said the original task force was separate of the RPT process and part of the reason the original task force took so long was that between meetings we were literally developing the baseline data and information. Hansen, personal preference, did this meeting with the RPT, figuring that if we came up with a consensus that it would go back to the RPT and be developed as a board of fish proposal and they would have been involved by working in conjunction with and cooperating together. Would like to see that we meet prior to the RPT but here is the rub do you meet before or after because you need the information from the RPT meeting such as the allocation figures but don't want any more time to go by and would like to have the next meeting at the same time as the RPT and get as much information on the table, along with board of fish proposals ideas, and if we are working on ideas that are not quite done we could go to the board of fish and say that we have been meeting but didn't' quite get there but this is what we have been discussing. Encourage the group to set up a meeting in conjunction with the RPT meeting with an agenda but also make it clear that this is the time to put any and all ideas on the table. D. Kelley said that if we are going to review the plan we should develop a specific problem statement. How do you arrange an agenda without a specific problem statement of what is being addressed? As the group that is chronically under their allocation and supported the industry consensus we aren't sure what the problem is. It would behoove you to have a very specific problem statement and I'm still not sure what the problem is. Hansen said I'll take a shot at answering that one. Spent a lot of time before this meeting talking to people trying to understand the concerns and it keeps coming back to me where people wonder if you can get the trollers up into their range and at what point is it fair to be spending the majority of the budget for projects and the fish aren't making it up into their holds and then you have gear groups paying taxes into regional associations feeling that they aren't getting their share of projects out of that program, they might be above their allocation range but not seeing benefits from the association that they paying taxes to. D. Kelley can appreciate that, my board might say, you get what you ask for because ATA never wanted to be part of the allocation plan to begin with, but now there is a lot of expectations that have been built up, get lots of pressure on why we aren't within our range but realistically we understand why we aren't. Important that the people who are dissatisfied lay out their reasons in a problem statement so I don't' have to try and go back and explain what I think the problem is. Becker said it is simply time to review the plan, this is working fine, this isn't; there has been 15 years of expectations and the sooner we get started the better; the question is the format to review the plan. Danner said the trollers could argue that we are also funding successful net programs as well as net programs funding unsuccessful troll programs. Peckham said whether we should review the plan should be on the RPT agenda, we have mostly gillnet representatives here and not all the RPT members. Pryor said he thinks what he is hearing is to have a formal review would have to go through the RPT spring meeting but a workshop is more informal review and would not carry as much weight as an official RPT review. Grussendorf said that the same members don't

to take a look at the SE Enhanced allocation plan, what are the various aspects that people are interested in having the RPT discuss/review, why; what's working and what is not, why; what are the ideas to bring gear groups within their allocation ranges; board of fish proposal ideas; and are there other plans out there that might be a substitute for the SE enhanced allocation plan. This is very broad and I understand that, but you need to flesh out any different scenarios that are out there or ideas and then the RPT can the next day look at the discussion and decide if we need to look at the allocation plan or we need to look at ideas outside of the current plan, although I don't think you will be going there but I might be wrong. You need a place for any one with ideas to bring them forward and that has not happened for a very long time. You had Blough and Danner bring some ideas today to the table but they didn't really fit into the agenda for this meeting so you need a fairly loose agenda next time so that someone is not told that the idea doesn't fit into the format and is turned away. We need to let the conversation flow and do more brainstorming. We might say that allocation as per the industry consensus is still off the table, we want to review the 5 year rolling averages, we still think that long term, new production is the best solution. I'm making this up while I'm going along as to the ideas that might move forward. McDougall felt like this informal workshop will discuss the plan and then you decide the following day whether you want to officially review the plan. Yes. Eliason said that might not be such a bad idea, go directly to the RPT meeting and you get stonewalled, this way it is industry driven and we take to the RPT what we discussed and why something should be looked at. McDougall said I'm willing to do anything but want everyone to understand what we are doing. Burke said that hatchery operators will need time to get information together, we can't do it off the top of our heads during the meeting. Hansen said she understand that but at sometime you have to have the discussion, could do at the individual gear groups levels but thought that having the broad discussion first would be less contentious in the long run and that you could work out what information would be needed for the next meeting. Burke clarified you wouldn't want data for the spring meeting. Hansen agreed that data requests would come out of the RPT at the spring meeting because right now we don't know what those will be. Pryor summed up the discussion and then asked about what else we need to cover today. McDougall said the chum trollers handout since we still have a little bit of time.

(SEE ATTACHED)

CHUM TROLLERS HANDOUT:

Hansen said she mentioned it right before lunch but what was the thought behind changing the broodstock at Deep Inlet all to one stock. Danner answered that the early run in July is failing. We are hoping to shift the eggs to Deep Inlet so that we would have a larger run returning so that we would catch more of them. Blair said Deep Inlet has two separate runs, Hidden Falls stock in late June/July (24M) and Medvejie in July/Mid Sept. and that allows us to catch fish for 10-12 weeks. Blair answered that if you shift eggs (if you could) it would compress the run to about 5 weeks and you would lose flexibility in cost recovery and the seiners spreading out their fleet and fish longer but thinks that what is driving the issue is that the trollers are able to catch the Medvejie stock better. Not sure that NSRAA would support it but changing the stocks would complicate the issue more than help out the trollers. Danner doesn't have a problem hearing about problems with the ideas; that is why they put them out there for discussion. McDougall said in possible support of the concept that the later run has been more successful but said that in

some years the cost recovery is done by about August 1st and came primarily off the first run and we've had some problems getting cost recovery the last couple of years. McDougall wants to go down the list some to develop new remote release sites, our board has directed staff to look at new ideas but king and coho productions, if we (gillnet & seine) make some money on it great, but sometimes it doesn't help the allocation problem and maybe makes us go backwards. Want to make sure when we look at the projects they are actually getting fish to the trollers. Danner wants to clarify that the chum trollers fully support all king and coho production now in place, anything that will help bring us up to our allocation but firmly believe chum opportunities are the key to getting the trollers up in their allocation. We would really like some troll specific chum remote release sites. McDougall said one of the problems you will hear on that and even from the Dept you will hear that is that even if we had a spot to go do that; say the NSRAA said that there would be no net fisheries in Deep Inlet but there has to be a net fishery somehow to keep the chums mopped up. Even a troll specific remote release site needs some type of net rotation for clean up. Danner said they are in favor of the net fleets mopping up at the end but the trollers to be successful need exclusive access without net fisheries. We aren't looking for exclusive access permanently but while the fish are biting and after the trollers can't catch them there might be a benefit for cost recovery or another gear group. D. Kelley asked for clarification from McDougall if one of the concerns was that that you wouldn't get as much of a benefit for the trollers because of the mop up by the net fleet. McDougall said you have to have some type of net fishery for clean up, What type of interceptions would chum trollers have if they were allowed in there day after day in all these areas being asked for access. Are you going to have more trollers fishing chums or are we going to have lots of foregone opportunity? You don't want to build and then end up with no one coming. D. Kelley said the same thing. Knight said he doesn't understand asked about THA opportunities earlier for trollers; this contradicts what he thought he heard earlier. Otte clarified that he was talking about coho and kings don't bite well in THA where you need space to fish, chums are different. Danner said if we are going to explore this a little farther, the concept build them and they will come. Burke said earlier that the trollers were exceptionally successful at Neets. If you built a troll chum remote release site and as the trollers accessed the area more the net fleet would have to reduce their effort as the trollers increase theirs. McDougall said as a fiscally responsible NSRAA board member from a budget standpoint he could support chum access if funds from other projects were diverted but can't accept another request for another troll project. Danner said NSRAA board representatives would be willing to look at that. McDougall asked about the 5th point on the chum troller's handout it's an NSRAA issue. *(Work on making sure Brood Stock closure losses to trollers in Eastern Channel are made up before CR or Net fisheries benefit from those closures.)* I take some strong disagreement with this issue about broodstock, everyone needs to share in the pain and pointed out that when the net gear groups were tied up to allow for cost recovery, the trollers were still fishing in Eastern Channel seven days a week, okay the trollers are out of their range but when it reopens you also want first chance before cost recovery, we're suffering and so are the seiners who are out of their range. Danner said use last year for example that the five day closure August 12th and then on August 19th no let me tell you what happened, the net fishery got closed down for broodstock and cost recovery and then the trollers got shut down. McDougall corrected that the net fisheries were closed

But no allowance was made for trollers when McDougall presented the request for Dipacs 1.5 million & received it.

down for cost recovery and the trollers were closed down for broodstock. It was explained that the only reason you can close down the troll fishery is for broodstock. Danner said so when we got shut down for broodstock and they took broodstock from Deep Inlet and towed them in net pens to Medvejie and then asked what it was they needed. Lon explained that NSRAA needed 60,000 broodstock from Medvejie/Bear Cove and at the point they closed down for Broodstock they only had about 10-15,000 available behind the barrier by the end of August and it was apparent that they needed to get some broodstock from Deep Inlet back to the hatchery so they would have the likelihood of reaching the egg take goal. Normally they would be seeing a build up of fish in Bear Cove so by late August would usually have about 45,000 available for broodstock. Danner said that the chum trollers were split about this issue, it was contentious. All trollers want to contribute to broodstock needs. But they felt that the broodstock taken came from chums that the trollers would have caught and could it be made up to the trollers at another time but arguing about broodstock is difficult. D. Kelley said she was in the Fish and Game office when it happened and it was a painful decision to make and doesn't happen very often. Danner said that they were looking for any ways to help the trollers; big ways and little ways. McDougall said you do realize in the end we didn't get all the eggs necessary. Danner asked SSRAA if they had additional funds would they be able to grow more coho because you have been incredibly successful. Otte answered that for SSRAA the issue isn't money but is water for raising the yearlings, looking for lakes and other opportunities. Peckham said the interesting thing is that SSRAA is better contributing to all the fleets but I don't think the troll interception is that different from the north end. Otte said the troll contribution is higher at SSRAA because it goes through the fleet longer. Otte answered that Blakewell coho's just came on line this year which we did in conjunction with the forest service. Burke said SSRAA has the data per project for the troll survival/interception rates. Danner said she would like that information for the troll association. Franulovich said they could release more coho at Nakat. Hansen asked about the third bullet point you mention Port Lucy for a chum release site for trollers but my memory was that it was the trollers that prevented that from being a release site. Danner, you are correct it was the Port Armstrong trollers that prevented it. They were concerned about seiners being there and I have talked to 8 Port Armstrong trollers and if it was only a troll area they wouldn't have that objection. It was a gear conflict issue. Pryor my first meeting as chair of the RPT that was issue number 1 and issue number 2 was to take care of this PA problem. McDougall would like to ask about some of the Board of Fish proposals; what is the shift in lines in Lynn Canal about? Trollers are allowed to fish in District 15 already after July 1st seven days a week. Danner said when the chum trollers were brainstorming ideas, we thought this was a forum for ideas and then we tried to separate them. We don't have to discuss now and it's not fleshed out, let me get back to you on that. McDougall said it's not a DIPAC call or gillnet call on whether you get to fish in parts of District 11 but you brought the gillnetters into the issue when you talk about shifting District 15 lines. Danner said let me look at the lines but at the end of the day. McDougall said just take out the word gillnet. Hansen said you are aware that District 15 is a common property area other than the Boat Harbor THA. Danner said she is more aware of that after this meeting than I was before and would like to postpone answering for now. Hansen asked what they are trying to get at with the bullet point regarding opening up Hidden Falls

June 10 to Aug since the area is open to trolling on June 10th until the 30th. Danner looking for an opportunity to access during stat weeks 25, 25 & 27 (didn't get written in the notes) the chum return to Hidden Falls that would start about June 10 and take you to the end of June, we can't fish after that because of the one king for every chum restriction. Also discussed maybe there is an opportunity at the end of the run in July. Just looking for an opportunity in June when it would not be in conflict with a king salmon opening and not when it is the peak of the run which we couldn't handle. There was an awful lot of resistance for the end of July due to the quality of the fish. We're looking for access to Hidden falls an existing program that is near town, easily accessed by tenders and would be a well-utilized fishery. Hansen, I look at it and June 10th to June 30th, the access is already there, isn't it? Danner said Kathy you are right the access is there, it's so ineffective for us, it the exclusive access there, oh that's the word that is missing. There we go. OOHHH!! (entire group) Hansen said that's totally different than right now when it is open. McDougall said if you want that discussion you need representatives from a different gear group here at the table, talked to Eide earlier in the day and there is concern that if you got really effective over there you might start to take 4- 500,000 fish, that might be a big deal, is there a way to put a cap on it? Is there a guarantee that the seiners will continue to get their Sunday's and mid-week, how will it affect cost recovery, are we going to affect this gear group that is already under their allocation already, or is cost recovery going to be smaller in the future because the trollers bypassed some coho and Chinook production, The current scenario is not going to work for everybody. Danner also spoke to Mitch about it, we are aware that we are getting into an area that is a traditional seine area and there are going to be lots of reasons to not do any of these ideas. At the very beginning of the paper I said it best; if you have a cap then the gear group gets fish from the gear that is above their range. So if we had exclusive right to an amount that is capped then the gear group that is above would give opportunity from one of their areas. I can't dance around that anymore carefully. *(So the bullet point should read Open Hidden Falls Stat weeks 25, 25, 27 (June 10 – Aug) for exclusive trolling).* Hansen asked Garrison how many fish in 2009 did the gillnetters harvest in Deep Inlet. Garrison answered 120,000 chums. McDougall asked about the last item on the list for Armstrong and Kake production. What is the current status of the waters around this production, can you troll there now when the chums are around. Reifenstuhl said the SHA they couldn't. McDougall clarified what about the waters around the area is that a troll area? Peckham answered yes but if you released the fish at Port Lucy they may have better access to the fish. I don't think they can go into Port Armstrong. Otte it's just Chatham Straits and it is just open. The SHA doesn't go into Chatham but don't know how the chums are behaving. McDougall just wondering how much opportunity there is out there without anyone doing anything; don't know if that puts you right on the pocket of fish or not without someone trying it. For the gillnet fleet, I'm a strong proponent to try and get Kake to succeed but there is an opportunity there for the trollers maybe; Kake may need some oversight and financial support but the seiners haven't really wanted to financially support but maybe the trollers would think it would be worthwhile. Garrison said the SE Cove SHA is really small and extremely rocky and probably would not be suitable for trolling. Just a couple of entrances where the fish enter through so would think a troll fishery could be developed, you just need to pioneer the fishery and there is a potential opportunity for trollers, just need to take the

DRACONIAN RESTRICTION PREVENTING TROLLERS FROM HIDDEN FALLS chum.

REVEALS THEIR TRUE CONCERNS, NOT THE FALSE ARGUMENT SO OFTEN PRESENTED "YOU CAN'T CATCH THEM."

IN SUPPORT of PROPOSAL 188 & IN OPPOSITION TO 187.

ARGUMENT FOR 188.

time and effort. Peckham said it won't be a dedicated seine area but part of the problem has been the inconsistency. Danner said these are just ideas and are considering more not just exactly what's on the list but how hatchery operators might improve the returns to an area and is one of the things we want to throw out there. McDougall thanked Danner for answering the questions and appreciated the open forum so he didn't go home wondering about some of the items. Hansen asked if it would be possible to have at the next workshop the preliminary and final '08 allocation numbers before they are formally presented to the RPT. Question was asked who is in charge of the workshop. Pryor said he will put the workshop together. What will it be called? "Informal workshop on Allocation"

McKean ended the meeting by thanking all the hatchery operators and expressing the importance of the hatchery fish to the fisheries and wished everyone a Merry Christmas.

C.T.A. PROPOSALS TO 2009 S.E. ALLOCATION WORKSHOP PRESENTED.

Ideas for moving trollers within their allocation (27-32%) of SE hatchery salmon harvest

1. (SSRAA)Retain Chum Troll opportunity at Neets Bay.

2. (NSRAA)Convert HF stock chums released at Deep Inlet to MV chums.

3. (NSRAA, ADF&G) Develop alternate remote release sites for MV chums, Chinook, and coho. (Cascade Creek, Crescent Harbor?)

4. (NSRAA) Go over Chip Blair proposal and support or propose alternative to DI re-opening plan.

5. (NSRAA, ADF&G) Work on making sure Brood Stock closure losses to trollers in Eastern Channel are made up before CR or Net fisheries benefit from those closures.

6. (NSRAA, RPT)Invest some of NSRAA 3% in coho production at SSRAA.

7. (NSRAA, ADF&G) Release HF stock not working at Deep Inlet to Remote release site elsewhere and provide troll access. Replace 18 million HF stock at Deep Inlet with MV stock.

8. (NSRAA)Split the opening of the terminal harvest area at HF to allow trollers to target chums at either Takatz or Kanaku without interference from CR or Seine fisheries in that sub-area until July 1. (Last Sunday in June, June 28, or until a certain % of the expected return was harvested by trollers were also discussed.)

9. (NSRAA) Establish viable troll coho fishery at Hidden Falls (HF) by eliminating or greatly reducing cost recovery on coho at this site.

10. (NSRAA, ADF&G) Develop additional remote release sites for HF and Medevejie (MV) Chinook.

11. (BOF) Open parts of District 11 to trolling for hatchery salmon. Process to draft Agenda Change Request (ACR) to the Board of Fisheries for experimental openings in 11 to find where chums/sockeye are biting. To minimize by-catch, and impact (if any) on Juneau sport fisheries. Full proposal for BOF consideration in 2012.

12. (BOF, NSRAA) Redo lines in Deep Inlet to reduce net harvest of MV Chinook.

13. (BOF) Require troll access at all SE hatchery terminal harvest areas.

14. ((BOF) Board of Fisheries) Shift lines in Lynn Canal for gillnet/troll areas.

15. (BOF)Repeal 1 chum/1 Chinook regulation in the HF terminal harvest area after July 1.

16. (BOF) Open Hidden Falls Stat weeks (June 10 –Aug) for trolling.

17. (HO, Regional Planning Team (RPT)) Request each Hatchery Operator (HO) to share what percent of the gear group harvest value of their production is going to trollers.

18. (HO, RPT, BOF)Request each HO to explain their plan for bringing trollers up to 32% starting in 2010.

19. (RPT, HO) Dedicate Port Armstrong and Kake chum production to troll harvest until we are within our harvest allocation value range.

FROM: 2013 SPRING NSRAA BOARD MEETING
Proof of DIPAC $1.5 million DOLLARS for ELIMINATION [illegible] RECOVERY

public was really important and was not in favor of teleconferencing. The President summarized by stating that NSRAA will continue forward with both options available to the Board and the public.

The Board left for lunch at 11:45 and resumed at 1:15pm with all Board members in attendance.

DIPAC Funding - Eric Prestegard, Executive Director

DIPAC is out of debt as of December, having paid back $42 million dollars to the State, due to great survival and increased chum returns and is now in a position to financially assist NSRAA with cost recovery expenses. NSRAA's past assistance to DIPAC has been greatly appreciated. DIPAC is donating $1.5 million dollars to offset NSRAA cost recovery expenses at Deep Inlet this year! DIPAC total contribution to the fisheries this year is $1.5 million dollars in direct assistance and $500,000 dollars, approximately, in enhancement taxes on fish caught that were produced at DIPAC facilities (formerly a joint program with NSRAA). This donation is quite significant and represents a third of NSRAA's $6 million dollar budget and an increase in fishing opportunities to the fleets made possible by the elimination of cost recovery closures. The President, Kevin McDougall relayed how he had asked the DIPAC Board several years ago to consider options for assisting fishermen when the organization finally got into the black. Eric J reminisced about Ladd Macaulay's years of vision and leadership at DIPAC. Steve's opinion was, "If it wasn't for Kevin taking the initiative to move this forward with the DIPAC Board this donation would have never occurred at this time. It was very fun and enjoyable to work with Eric Prestegard and Kevin." The Treasurer remarked that in a few short years, between implementation of the new HF tax assessment program and now the DIPAC contribution; NSRAA has completely gotten rid of cost recovery. This is a huge benefit to fishermen. A fisherman asked about the current composition of the DIPAC Board, "Is the Board the same, are the officers the same?" Eric P said they are changing the Board from 32 members, down to 24 in size and also adopted some bylaws changes so they will have 4 seine, 4 troll and 4 gillnet seats. The DIPAC Board Chairman is Sandy Williams. Kevin thought it would be good to have a regular presence at the DIPAC board. At least to report to their Board on how NSRAA utilized the contribution. Kevin thought the most likely liaison to DIPAC is the General Manager. Steve said he and Eric will draw up a one page cooperative agreement document about the $1.5 million contribution.

Chinook Futures Coalition (CFC)

Howard Pendell Northern Panel Troll Representative Pacific Salmon Commission

Howard summarized the purpose of the CFC and history of some of the actions at the Treaty. The State of Alaska "Got bullied into a 15% cut over the entire abundance based formula used to set the annual catch allocation to the Alaska fisheries. This 15% reduction will remain in place for 10 years unless appealed at the five year meeting, which is coming up. CFC goal is to raise funds to strengthen arguments to eliminate the 15% cut and to go back to formula originally agreed to." Howard said the State needs help in Washington DC (politically) and stronger scientific arguments to be made at the Chinook Technical Committee. Currently the Endangered Species Act (NMFS) is being used to intimidate Alaska into giving up access to healthy and rebuilt returns of Chinook salmon. Howard is requesting NSRAA to make a $16,000 donation to CFC to pay for a scientific study by Dr. Dave Bernard which would evaluate the status of Chinook stock(s) as to whether or not they are being correctly represented as endangered, when in actuality the stock(s) may be rebuilt and achieving adequate escapements. NSRAA has long been involved with aspects of the Treaty and the rebuilding programs. The original mitigation programs came from the Treaty; like the Medvejie chinook enhancement programs. $15 million in Federal funding has come to Alaska for mitigation but none of it is available for the type of things CFC is trying to do. It is half of the $30 million that the other countries get. The

Chum Trollers Association

copy

January 19, 2013

Cora Campbell, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
1255 West 8th Street
Juneau, Alaska 99811-5526

Dear Commissioner Campbell,

The imbalance in common property salmon production remains a concern for the Chum Troller's Association and the fishermen we represent. As part of our on-going effort to correct this inequity, we ask you to please clarify these three issues:

1) **District 11a is closed to trollers in the summer per 5AAC 29.100. Is the SHA permanently closed as well?**
In the late 1970's, 11a was closed by BOF action to trolling because of low salmon returns to the Taku river. Since that time a robust chum fishery has been developed by DIPAC with Amalga Harbor SHA a primary release site. Part of the redress we seek may involve access to that Special Harvest Area. This is one tool outlined in the SE Alaska Comprehensive Salmon Enhancement Plan to bring gear groups into balance within their allocation ranges.

2) **Will a 1:1:5 rotation within the Deep Inlet SHA (trollers 5 days/wk) satisfy the BOF's 1:1 ratio for net fisheries?**
The BOF, at its' February, 2009 meeting in Sitka, established a 1:1 ratio for the net fisheries for three years. The 2012 meeting extended it for another three years.

3) **5AAC 33.364 (b&c) outlines a process for the Department to review and the BOF to remediate gear group allocation inequities. What is required on our part to initiate this process?**

Last year this gear group, which has the largest number of permit holders, harvested 0.5% of the total DIPAC return, 8% of the Deep Inlet return and 0% at Hidden Falls. You can understand why we are concerned.

Sincerely,

Linda S. Danner, President

Chum Troller's Association
P.O. Box 6174
Sitka, Alaska 99835

IN SUPPORT of 188. S.E. COVE AS RECI
OFFERRED AS "TROLL PRIORITY" FOR MANY [illegible] W.

Spring Troll Meeting -- Sitka -- 2013
NSRAA Report

1. 2013 Projections…
   a. Chinook
      - ❖ Medvejie – 30,000 fish (25,800 in 2012)
      - ❖ Hidden Falls – 12,300 fish (9,400 in 2012)

   b. Coho (forecast is based on 6% survival)
      - ❖ Hidden Falls – 154,000 (36,000 in 2012)
        Deer Lake – 124,000 (42,000 in 2012)
      - ❖ Sitka – 10,000 (6,000 in 2012)
        *Second Salmon Lake coho return in 2013
        Larger returns (>50K) should begin in 2015

   c. Chum
      - ❖ Deep Inlet – 1,370,000 (656,000 in 2012)
      - ❖ Hidden Falls – 1,315,000 (1,240,000 in 2012)

2. Troll fishery information…
   a. BOF proposal: Bear Cove Troll line change (passed – already in effect since 2010 by EO)
   b. BOF proposal: Deep Inlet THA Troll line change during Chinook Management period in June – pulls Western line in to allow Troll drag near Samsing Bay (passed)
   c. PAR for Medvejie Chum: allows for 10M additional fry release at Bear Cove starting in 2012 (should relieve broodstock problems and we hope will add 250-300,000 fish to return (first additional adults in 2015)
   d. Hidden Falls coho fishing during troll closure – new area (2010)
   e. Hidden Falls coho troll / cost recovery – an attempt to balance the harvest (late August – mid September) continuing
   f. Troll opportunity change to Deep Inlet re-opening plan (2012) – **1 day** with minimum 24 hr notice when fishing reopens after a cost recovery or broodstock closure (No CR closure in 2013).
   g. Troll opportunity change to Deep Inlet (2013) – July 28 through end of season – 2 troll days inside THA per week (Wednesday & Friday)
   h. Mist Cove: open to trolling during the season and during the coho closure

3. Recent Production Changes affecting Trollers…
   a. Chum fry increase at Bear Cove (see 2c. above)
   b. Discontinuation of our Chinook Zero Check Programs
   c. Shift of more Chinook into Green Lake Rearing (1.5 to 2 x higher survival rate)
   d. New Chinook release site -- 550,000 smolt - away from Silver Bay jellyfish (HPM – first release this spring – 2012. First adults 2014-15.)
   e. Reduction of Chinook release at Hidden Falls from 1.1M to 650K > increase in Coho releases from 2.75M to 3.25M
   f. Increase in Deer Lake (Mist Cove) coho releases from 1M> 1.5M> 2.2M
   g. Update on Salmon Lake stock development in Sitka
   h. Pelican research is ongoing
   i. Southeast Cove Chum project

4. More fishery / historical information on our website – **www.nsraa.org**

EXAMPLE of PROMISES MADE ON BEHALF of THE TROLLERS, BUT LATER UTILIZED by THE NET GROUPS OPPOSING 187. ↑ IN SUPPORT of 188 AND

Chum Trollers Association

copy

January 19, 2013

Cora Campbell, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
1255 West 8th Street
Juneau, Alaska 99811-5526

Dear Commissioner Campbell,

This year trollers have fallen even further behind in our allocated share of Southeast enhanced salmon harvest values. In this letter we will detail the severity of the problem, suggest a process for resolution and urge the hatchery managers and JRPT to seriously address this glaring inequity.

Problem:

Trollers' 27%-32% share of the enhanced common property value was set by unanimous vote of the Board of Fisheries in 1994. This was based on long term averages, assessment contributions and a consensus task force recommendation. Preliminary estimates presented at the November 2012 NSRRA Board meeting demonstrate a dramatic decrease in the troll share of enhanced harvest value.

Here is the Reality

This 2012 season Southeast Alaska enjoyed a record $65 million hatchery harvest value. However, the troll hatchery share went down dramatically from a long term average of 18% ($8,355,111) to 12% ($7,654,083). **Our allocated share is 27% - 32%. The difference between the troll allocation midpoint of that $65 million harvest value and the 12% trollers actually harvested is approximately $12 million dollars.**

While the state salmon enhancement plan calls for adjustments in the terminal harvest areas, **in reality,** trollers have been mostly excluded from the areas, particularly in regard to chum harvest. There is no trolling within the Amalga Harbor DIPAC terminal harvest area. At Hidden Falls we are permitted only one chum per chinook in the SHA in July. At Deep Inlet we are allowed only one day per week after six days of net fishing during chum harvest time.

Contrast this with the SSRAA Neets Bay fishery, where a strong commitment to the troll fleet both within and immediately adjacent to the terminal harvest area has trollers catching over 400,000 chums in each of the last two seasons.

For years chum trollers have repeatedly expressed concerns to NSRAA, SSRAA, and DIPAC Boards. For example, at one meeting, the CTA presented 18 proposals to the RPT to improve troller share of SE enhanced salmon harvest. A reading of both the SE Alaska Enhanced Salmon Management Plan, 5AAC 33.364 and the associated BOF findings (94-148-FB) makes it clear that remedial action is mandated to rectify this ongoing inequity.

Goal:

Hatchery management plans should be initiated prior to the 2013 season, consistent with the allocation plan and BOF findings, with the goal of increasing troll access to the respective SHAs. These management plans should continue to be reviewed and revised in subsequent years so that the troll share of the 2013-2017 five-year average is within the 27% - 32% allocation.

The Chum Troller's Association has expressed to hatchery managers and the JRPT at both the November NSRAA Board meeting and the December JRPT meeting that we are unhappy with the current situation and feel action is mandated. This letter communicates that request In writing. This continued and increasing shortfall is unacceptable.

Sincerely,

Linda S. Danner, President

Chum Troller's Association
P.O. Box 6174
Sitka, Alaska 99835

TO: REGIONAL PLANNING TEAM
ATTEN: FLIP PRYOR

Preliminary statistics for the Sitka Sound 2013 chum troll fishery show that the troll fleet again fell short of the 27-32% range both for overall southeast enhanced value and north end value. We came close, when the overall value of NSRAA's king and coho contribution was considered. ADF&G regulation ***5 AAC 33.364*** mandates remedial action for any gear group that is ***"outside of its allocation percentage for three consecutive years."*** Remedial action is through adjustments of hatchery (management) harvest plans.

As a partial remedy for the 2014 season, the Chum Troller's Association proposes that:

Deep Inlet Access Be Restricted to Troll Effort Only For a 14-day Period

This 14-day period could begin during the first week of August and would be in lieu of all other troll access days in the THA during July and August.

Total number of troll days during chum management as well as number of seine and gillnet days would not be significantly different from 2013.

An early-to-mid August troll access period could coincide with the August coho troll closure. This would allow a maximum number of trollers to participate in a Deep Inlet fishery.

The traditional cost-recovery closure of the THA has occurred during this time period, therefore access to the net gear groups would remain similar to that during a normal cost recovery year.

The 2014 cost recovery period, if any, is not known at this time and CTA recognizes a significant portion of the first week of this troll opening may be needed for cost recovery. Trolling would not occur in the THA at this time.

The 2014 forecast for the Deep Inlet THA is over one million chum salmon, one of the largest concentrations of Southeast Alaska hatchery fish and represents a significant opportunity for trollers to address their allocation inequity.

While our goal is to eliminate the allocation imbalance as quickly as possible, the CTA recognizes that it is impractical to do so in a single year. We are open to any plan that takes the important step of moving trollers closer to their allocation range.

Again, ***5 AAC 33.364*** requires remediation begin at the THA level and it falls within the responsibility of the Regional Planning Team to ensure compliance ***(BoF Findings #94-148-FB).***

With all of the above in mind, the CTA requests the RPT either adopt our example plan or generate a similar plan that would achieve the same level of increase in the troll share of Southeast enhanced salmon.

Thank You,

Linda Danner, Chair
Chum Troller's Association

FROM: NSRAA 2014 ANNUAL MANAGEMENT PLAN.

to what extent harvest is contributing to the low escapements to Clear River, but more conservative harvesting opportunities in Kelp Bay can be expected during July.

Gillnet Fishery

Coded wire tag (CWT) recovery data from previous years indicates that relatively small catches of HFH chum salmon are taken by commercial drift gillnet gear. In recent years, otolith thermal-mark data has corroborated the CWT data.

Sport Fishery

Relatively small numbers of HFH salmon are caught in sport fisheries in Chatham Strait. Concentrated sport fishing effort does occur terminally in Kasnyku Bay for king and coho salmon. Sport and personal use fisheries will be managed as described in regional codified regulations for those waters defined in each SHA. The department may use EO authority to address issues as they arise in season.

4.2 *Terminal Fisheries*

In January 2006, the BOF adopted new language for regulations under the *Hidden Falls Terminal Harvest Area Management Plan* (5 AAC 33.374). The new regulatory language only clarified how the common property fisheries in the THA will be managed and did not change the intent of the previous regulatory language. In summary, regulations for management of HFH THA stipulate that during June, trollers may target and retain chum and king salmon, and purse seine openings will be limited to two days per week. In June, if the purse seine fishery does not open as scheduled in the *Southeast Alaska Purse Seine Fishery Management Plan*, in order to achieve broodstock goals, trollers are not allowed to retain chum salmon provided at least 7 days remain prior to July 1. During June, an area within Kasnyku Bay may be closed during seine openings in order to allow trollers continued access to king salmon. Beginning in July, trollers are limited to retaining 1 chum salmon for each king salmon in their catch. During July, areas within the THA may be closed to seine and troll gear, as needed, to provide for broodstock needs at the hatchery.

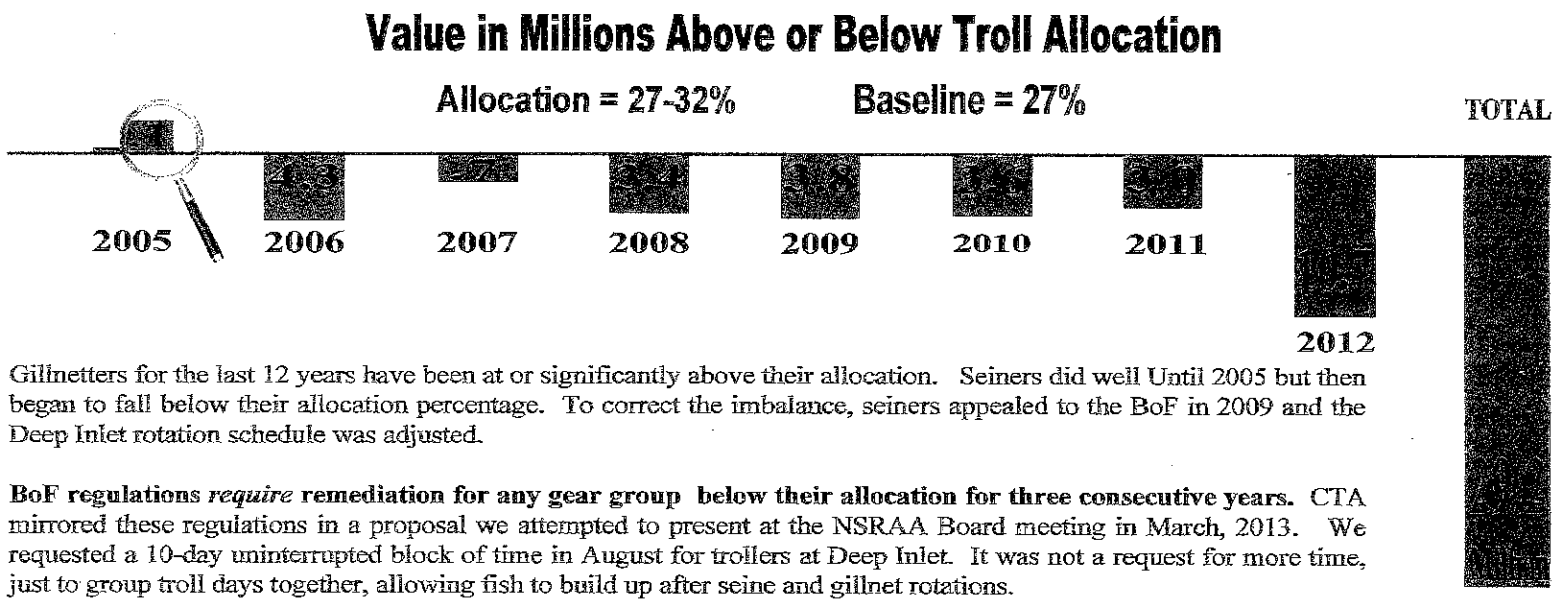
DRACONIAN RESTRICTION PREVENTING CHUM TROLL ACCESS.

Chum salmon

No direct cost-recovery harvest by NSRAA is planned for the current season. A tax assessment plan for chum salmon harvested in Section 12-A statistical areas 112-22 (HFH THA), 112-21 (Kelp Bay), and 112-11 (Outer Kelp Bay) will be used to provide needed revenue for hatchery operations. Purse seine openings are scheduled to begin June 15, with openings expected each Sunday and Thursday through the end of the run. Sunday or Thursday closures, or line modifications, will only occur if necessary for meeting broodstock goals. If a large abundance of HFH chum salmon appear early, the first HFH opening may occur on Thursday, June 19 (midweek fisheries are concurrent with scheduled openings at Deep Inlet THA).

How does missing allocation translate into dollars for trollers? A good example is the 2012 $60 million Southeast ch
Allocation", page 1). If trollers had reached the mid-point of their allocation (30%) we could have taken home $18 r
because trollers are excluded from THAs, our share of the $60 million was $7.5 million. The seine and gillnet groups
million trollers could have taken home.

Excepting the 2005 "blip" shown, the graphic below gives you a feel for just how much money trollers have left on the table over the years. The CTA is working to change this. (One of the better reasons for becoming a member).



Gillnetters for the last 12 years have been at or significantly above their allocation. Seiners did well Until 2005 but then began to fall below their allocation percentage. To correct the imbalance, seiners appealed to the BoF in 2009 and the Deep Inlet rotation schedule was adjusted.

BoF regulations *require* remediation for any gear group below their allocation for three consecutive years. CTA mirrored these regulations in a proposal we attempted to present at the NSRAA Board meeting in March, 2013. We requested a 10-day uninterrupted block of time in August for trollers at Deep Inlet. It was not a request for more time, just to group troll days together, allowing fish to build up after seine and gillnet rotations.

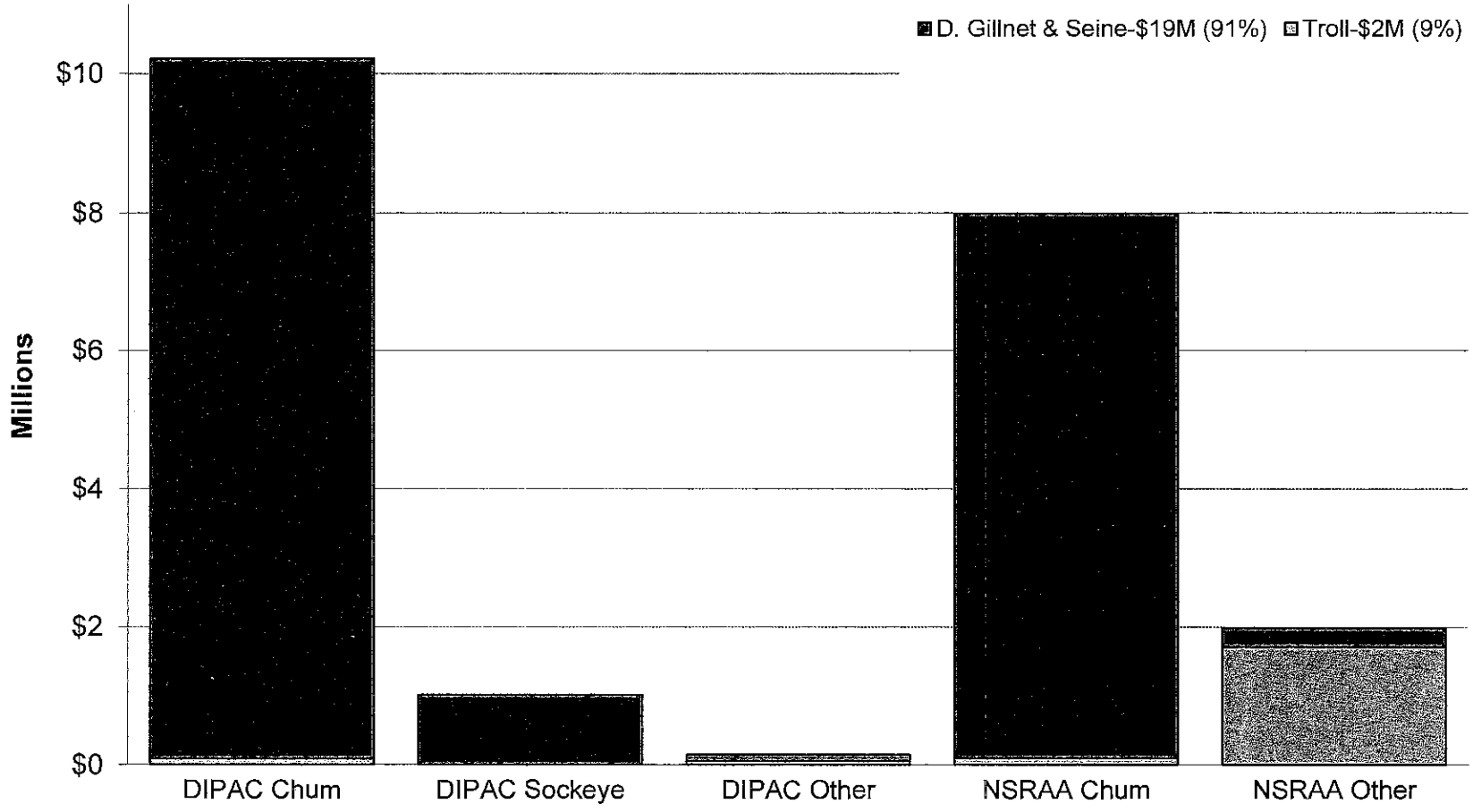
Discussion of our proposal was abruptly shut down by a parliamentary move of the Board Chair and opposing net gear groups. Troll days in the newly passed gear rotation schedule were later referred to as "build up" days for seiners and gillnetters in that meeting's minutes (NSRAA Board minutes, Mar. 2013 p 16 of board packet).

Contrast SSRAA's management plans for outer Neets Bay and Behm Canal. Their even-handed approach has had a markedly positive impact for trollers. Excepting 2013's partial run failure, trollers have taken in excess of 400,000 chum each year for the two previous years.

This illustrates the *dominant* factor affecting access for trollers. Politics, specifically fish politics at the local level. Hatchery Boards decide whether you fish in their THAs. They also pick representatives to the state's two Regional Planning Teams (RPT's) where those same harvest plans are reviewed.

The process, as far as trollers are concerned, is clearly broken and CTA will keep hammering home the truth. The Board of Fish, which enacted the the regulations, is responsible for enforcing their own regulations and resolving allocation inequity.

2014 Distribution of Value: DIPAC & NSRAA



Notes: Catch numbers from DIPAC and NSRAA fall board meeting books. Average weights and price from ADF&G "Est. Salmon Harvest by Area" SE AK and Yakutat Commerical Fish database on website; All seine info from "Hatchery Terminal Seine" except Hidden Falls seine chum reduced 20%.; DIPAC gillnet info from "Lynn Canal Gillnet"; NSRAA Gillnet info from "Hatchery Terminal Gillnet"; Troll king data from "Spring Troll"; Other troll data from "Summer Troll"

2014-No of Fish	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King
Gillnet	1505800	83300	550	4900	628561		3529
Seine	249100	1300	550	0	628561	252003	1874
Troll	15200	0	200	4300	16722	4	6045

DIPAC numbers from Table 4 Page 37 2014 December Board Book
NSRAA numbers from Fall Board Book (various pages)

2014-Ave Wt	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King
Gillnet	9.4	6.6	10.6	8.8	9	9	13.9
Seine	8.6	5.5	13.7	8.8	8.6	8.6	13.7
Troll	9.2	5.2	12.6	6.3	9.2	9.2	12.6

2014-Ave $/lb	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King
Gillnet	0.62	1.82	3.11	1.16	0.6	0.48	3.5
Seine	0.63	1.72	2.9	0.83	0.63	0.504	2.9
Troll	0.62	1.49	5.45	1.52	0.62	0.496	5.45

All weights and prices from ADFG "Estimated Salmon Harvestby Area" SE and Yak. Com. Fisheries website
DIPAC gillnet weights and prices from "Lynn Canal Gillnet"; NSRAA gillnet data from "Hatchery Terminal Gillnet"
Seine weights and prices from "Hatchery Terminal Seine" except value HF chum reduced 20%
Troll King weights and prices from "Spring Troll"; other species from "Summer Troll"

2014-Total $	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King
Gillnet	$8,775,802	$1,000,600	$18,131	$50,019	$3,394,229	$0	$171,686
Seine	$1,349,624	$12,298	$21,852	$0	$3,405,543	$1,092,282	$74,454
Troll	$86,701	$0	$13,734	$41,177	$95,382	$18	$415,110

Chum Trollers Association

To promote and improve Alaska chum salmon harvest for all trollers.

In support of 188.

Mr. Chairman and The Board of Fish.
As chairman of the Chum Trollers Association I speak with one voice for 110 members of CTA and 366 trollers that delivered round chum in 2013, nearly half the troll fleet.

Since the inception of the 1994 S.E. Enhanced Salmon Allocation Plan the trollers have been behind in our allocation. We have reached our range only three of those 20 years and have never been within our five year rolling average. Therefore we ask the BoF to adopt Proposal 188 as an example of the implementation of 5 AAC 33.364(c) .

In the struggle to improve our situation CTA has submitted a multitude of suggestions and proposals over an eight year span (see attached documents) to the northern hatchery associations and the RPT. But, as evidenced in the attached documents, the northern net groups have intentionally lingered in their position of significant financial advantage. Our net group counterparts, highly reluctant to abandon their privileged position, tell us that we should not so much as ASK for access to THAs that the net groups presently fully utilize.
Instead, we should set our sights on future new production. On these rare occasions when the net groups feel compelled to address our persistent grievances they often dangle before us a promise of "exclusive access" to projects coming on line. What's coming on line?

As it stands now NSRAA has 2 million in un-used permitted king salmon and 1 million un-used permitted coho. DIPAC has 600 thousand nn-used permitted kings and a little over a million in un-used permitted coho.

NSRAA has two under-utilized chum projects. One is Crawfish Inlet, a project hoping to have a partial return of permitted chums in 4 or 5 years. The other is S.E. Cove, which is due to have a significant return of fish in 2016.

Although CTA is eager for ANY species and program that will help correct this allocation imbalance, the fact is that...

Even if the trollers caught EVERY S.E. ENHANCED KING SALMON (of which we generally share 50:50 with the net fishermen) we would still lag behind in our allocation. It is evident that chum salmon are a necessary part of the equation if trollers are to come within our range.

Furthermore, from an all around perspective, for every chum fisherman on the grounds every king and coho troller benefits from a diversified fleet, increasing their opportunity to harvest enhanced spring kings and summer coho.

Recently in Sitka, the Seafood Producers Co-op has made boardroom decisions to better serve the growing number of members harvesting chums by adding a chum specific tender. They hope to capitalize on a BURGEONING chum market. Of all the salmon pools from the summer of 2014 the chum pool was one of the first to sell out at SPC.

I said all that to say this....

Proposal 188 plays 2 VERY important roles.

First, it protects the trollers from S.E. Cove becoming just another red herring offered by the net groups. In April 2014, as CTA was determining what proposals to submit to the Board of Fish, S.E. Cove was yet again offered by the net groups as a "troll priority" project if we would not submit any proposals the northern net groups viewed as

"hostile". For industry unity and a further example of our willingness to wait for "new" production we decided to drop our Deep Inlet access proposals. Our reward for this was to discover at the December 2014 RPT meeting in Petersburg that SEAS and USAG had a joint proposal, 187, allowing gillnetters opportunity in S.E. Cove. Important role #1.

Role #2 is just as vital. As we, and the northern net groups, have come to realize through the outstanding example set by SSRAA, a block of time and area are the management techniques needed to allow for the effective and meaningful harvest of chum salmon by trollers.
Again, as evidenced in the April 2013 NSRAA BOARD MEETING minutes,the two separated troll days in Deep Inlet are haggled over by the net groups with each of the net groups wanting to follow the troll days. They refer to the troll days as "build up" days.
These single troll days that directly follow an intensive net fishery are not effective for the trollers they are supposedly intended for.The five troll/2 net day rotation style that is in regulation does NOT work for trollers. Particularly when the troll days are not consecutive.

Outside the fact that net fishermen are much more effective at catching chums, nets also spook and scatter chum salmon. It takes a day or two for these fish to "build up" again. If the net group fishes their proposed 2 days, and it takes 1 or 2 days for the chum salmon to rebuild, the trollers are in the same position of having only 3 or 4 effective days. A troll fleet is reluctant to commit to this. Tenders are then reluctant to commit to the troll fleet, eventually leads the net groups to argue that trollers are "ineffective" and "can"t catch them" and "under-utilize" chums and shouldn't be allowed access to chum fishing.

BUT IF THE BOARD OF FISH ADOPTS 188...

Giving the trollers the correct management style and a location where the fish are most likely to accumulate in sufficient numbers without disturbances, we stand a significant chance of closing the vast gap we presently experience and labor under, both in the board room and in the pocketbook.

With sincerity and respect,
Linda Danner chairman
Chum Trollers Association

Chum Trollers Association

To promote and improve Alaska chum salmon harvest for all trollers.

In support of 223.

Mr. Chairman and the The Board of Fish.
As chairman of the Chum Trollers Association I speak with one voice for 110 members.

There is a misconception that chum trollers are single species fishermen. The reality is, we are the segment of the fleet that is by far the most salmon species diverse, targeting kings, coho, pinks and chums.

We are often conflicted, particularly in July, as to which species we should pursue. Some of this conflict is politically driven. In no small way the chum fishermen are under the burden of having to prove ourselves to the net groups. We must organize a fleet and effectively harvest chums in order to argue future access.
It's a constant, ongoing battle.

In early July we have two of the three major chum runs trollers can access. The first is a developing fishery in Icy Straits beginning the middle of June and lasting until the second week in July. This burgeoning fishery has drawn up to 180 trollers.

In addition, the first summer king opening is in direct conflict with the Neets Bay chum troll fishery. This is the only chum troll sanctuary that effectively allows trollers access to a THA in Alaska.
The SSRAA board makes an exemplary effort to see that trollers have an opportunity to harvest chums without net interference. It is absolutely necessary that we honor that effort with our own. It often draws 200 trollers. This chum fishery occurs from the 1st of July and peaks around the 22nd of July.

We also have an obligation to the processors. They have enormous financial commitments when supplying tenders, at our request...and we MUST do what we can to see they are successful.

An added benefit to the ever increasing number of trollers participating in the pink and chum fisheries is the escapement of feeder kings and cohos headed to inside waters. With the chance of a longer August opening it is probable that more trollers will postpone their summer king opportunity until August.

These may seem like personal choices but our efforts to diversify the troll fleet by sustaining a viable chum fishery benefit the whole. For every fisherman targeting chum it increases the opportunity for the wild stock troller. Whether you believe it or not many of us reluctantly choose chums for the above reasons. Giving a larger percentage of the summer king salmon

harvest to the August opening would take some of the sting out of these hard fleet-wide choices.

Now , from the standpoint of being king/coho fishermen. A larger second opening serves the resource. The kings are bigger, resulting in better utilization of the fish as well as a preferred fish in the marketplace.

Perhaps more important, coho are bigger. The troll fleet generally consists of smaller vessels. Targeting kings has it's own rewards, but to have a substantially larger coho as by-catch makes the draw to participate in an outside fishery, which always entails a few lost days due to weather, more valuable to the smaller vessel owner. Giving the smaller vessel more opportunity seems to be a fairer distribution of the wild stock resource.

It seems the fishermen that argue most vehemently for the status quo are those trollers that are also longliners. The preferred method for these troller/longliners is to fish the first opening, the longer the better, and then, rather than fish on the small coho that follow the first opening, begin longlining for the remainder of the summer.
The second loud voice are the out-of-state trollers who come to Alaska to target the first summer king opening and then return south.

Finally, with August's good weather patterns, less chum opportunity and significant volume of coho there is an increase in effort from all factions of the troll fleet. Therefore we are faced with a huge section of the fleet shaking kings. We could avoid a substantial amount of un-wanted king salmon with a larger percentage of allowable kings during this period of heavy participation in August.

In sincerity and respect,
Linda Danner chairman
Chum Trollers Association

Chum Trollers Association

To promote and improve Alaska chum salmon harvest for all trollers.

In opposition of proposal 230

Mr. Chairman and the Board of Fish.
Speaking as chairman of the Chum Trollers Association with 110 members.

Trollers have been fishing in District 15C over 40 years, which clearly makes it a traditional troll fishery. Therefore the1994 Board of Fish Findings 94-148B-FB protects troll access in 15C

The main reason that hatchery programs exist is to provide additional fishing opportunities to traditional common property fisheries.

In fact, the Guiding Principles #1, 2, and 3 of these findings not only support opportunity but they lend support to traditional fisheries as the highest priority, over hatchery cost recovery and broodstock needs.

The trollers that participate in the DIPAC enhanced chum fishery
would generally be fishing early to mid July. The main concern of management during this period is sockeye escapement and NOT coho and wild chum as the proposal implies.

According to data from ADF&G's Harvest Expansion Report, in mid-July of 2013 the gillnet fleet caught 1 sockeye for every 12 chum salmon, while the trollers caught 1 sockeye for every 60 chum.This is evidence that troll gear is significantly more selective at avoiding sockeye by-catch. By percentage the gillnetters catch 99% of the sockeye in this area during this time frame.

Wild coho and chum management doesn't begin until the latter half of August. To be concerned about the July troll catch of these fish, given the time frame of our effort, seems in-appropriate. A troller targeting chum in 15C probably catches fewer Lynn Canal coho than his colleagues are on the outer coast.

The Board of Fish should be aware that at many of the meetings CTA has been to, in our persistent attempts to gain access to enhanced chum in THA's, we were told to look for fish in traditional waters. As a matter of interest, when a CTA representative was sent to the 2013 spring NSRAA Board meeting requesting troll access in the Deep Inlet THA, the chairman of NSRAA, a gillnetter, specifically mentioned 15C as a traditional fishery we should pursue instead.

Furthermore, with trollers being the gear group farthest from our allocative range, to further restrict our access to enhanced salmon would be counter productive to "fair and reasonable" sharing as prescribed by the 1994 S.E. Enhanced Salmon Allocation Plan and it's Guiding Principles.

With sincerity and respect,
Linda Danner chairman
Chum Trollers Association

Chum Trollers Association

To promote and improve Alaska chum salmon harvest for all trollers.

In support of Proposal 176.

Mr. Chairman and the Board of Fish.

As Chairman of the Chum Trollers Association I speak with one voice for 110 members of CTA and 366 trollers that delivered round chum in 2013, nearly half the troll fleet.

Since the inception of the 1994 S.E. Enhanced Salmon Allocation Plan the trollers have been behind in our allocation. We reached our range in only three of those 20 years.

For the last 8 out of those 20 years CTA has been presenting arguments, suggestions, data, and proposals to NSRAA, DIPAC and the RPT (see attached documents) in an attempt to correct this problem, using the 13th and 14th Guiding Principles outlined in this Plan.

The effective responses from SSRAA and the consistently negative results from the northern hatchery association boards lead us to understand the problem.

INTENTIONAL NON-COMPLIANCE.

Proposal 176 is designed to correct a loophole in the 1994 S.E. Enhanced Salmon Allocation Plan.

There is presently no incentive to allow better access to the gear group that is farthest behind in their allocation range without the will of the hatchery association boards.

At the board level, two gear groups can effectively block a third gear group from gaining access to fish merely from the advantage point of having more votes. This advantage point has resulted in a net gain (pun fully intended) of over 30 MILLION dollars...and climbing. This has been accomplished in a multitude of ways. To demonstrate just one example, but my no means the most egregious....

Last year, driven by it's need to distribute money in order to remain in compliance with the law, DIPAC gave NSRAA, as requested by the chairman of NSRAA, a whopping 1.5 million dollars to relieve the lions share of NSRAA's cost recovery burdens. Without taking in to consideration the opportunities this could have presented to assist the gear group farthest behind in allocation, the net groups agreed to share this windfall amongst themselves by allowing themselves more rotations. The trollers did not get one dime, literally, of this 1.5 million dollars.

After so many years of dusting ourselves off from being swept under the rug we are finally appealing to the BoF to oversee the efforts made, or not, on behalf of the gear group lowest in their allocation. Rather than our submitting proposals that require the adjacent gear groups to reach in to their pockets and hand over fish, Proposal 176 requests that it be turned around. Proposal 176 requests that the northern hatchery associations and RPT submit annual reports to the BoF containing their plans to bring the gear group farthest behind in allocation to within their assigned range.

The further benefits of Proposal 176 are significant. Like the marvelous 1994 Plan, we also recognize change. Although the trollers are the gear group presently suffering from the fallout of imbalance, Proposal 176 can be used by ANY gear group lowest in allocation. We worded the proposal as troll specific only because CTA was unable to find generic wording that would give direction as to our intent to the Board of Fish.

Another attribute of 176 is the real possibility of reduced squabbles in every board room from north to south. Arguing effectively is the responsibility of every gear group representative. As any board member knows, to volunteer fish in to another group's hold is difficult enough. But then that same representative has the added burden of having to explain this to their respective disgruntled gear group, adding additional reluctance to compliance.

There is probably no better example of reduced squabbles than this BoF cycle. If proposal 176 were in place there would be no need for Proposals 175,182,183,187,188 and 225-227.

I urge the Board of Fish to acknowledge this oversight of an otherwise long-visioned Plan and support 176 as a formula for correction and improvement for all fishermen.

With sincerity and respect,

Linda Danner Chairman

Chum Trollers Association

WE PAY MORE THAN OUR SHARE OF TAXES.

2004-2013 Hatchery Taxes and Allocation

PROOF of 2014 COST RECOVERY COMING LARGELY FROM "TROLL" PROJECTS

NSRAA Cost Recovery Funding Sources by Specie and Site

		2012	2013	2014	
Chum	HF	$380,301	$86,310	$434,531	
	DI/Med	$130,551	$162,245	$151,985	
	HF tax	$1,379,651	$1,040,354	$300,000	(estimate)
	SubTotal	*$1,890,503*	*$1,288,909*	*$886,516*	
Coho	HF	$98,132	$423,811	$276,188	
	Mist Cove	$152,570	$520,004	$911,147	
	DI/Med	$172	$395	$362	
	SubTotal	*$250,874*	*$944,210*	*$1,187,697*	
Chinook	HF	$8,501	$2,987		
	DI/Med	$225,100	$654,311	$106,392	
	SubTotal	*$233,601*	*$657,298*	*$106,392*	

Sources: 2014 from NSRAA fall meeting book
2012& 2013 from NSRAA Website- "Data" section

RE: Proposal 220

Dear Board of Fish,

I oppose this proposal as it will move the Yakutat winter fishery line. By moving this line out more it will be allocating a lot more of the winter quota to a small amount of trollers.

The Yakutat winter line was already moved once in 2003 to help out the hand trollers. They said it is easier for them to follow a loran line than the surf line, and safer to navigate.

Since that time a majority of the hand trollers have turned into power trollers. According to the records there are about 10 or more power trollers that are consistently are fishing. They are doing very well and their catch now is about 15% or more of the winter quota. Thus, a hand full of power trollers are doing very well compared to the rest of the southeast fleet.

By moving the line out even more it will allow access to a lot more of the outside waters allocating even more of the winter quota to the small amount that are already doing well.

The winter troll fishery is an inside fishery not and outside fishery and needs to be kept as such.

Trollers all over southeast have taken a hit to slow down the winter catch so we can keep it open until the end of April, and to save fish for the summer season.

Sitka as well as Craig have already moved their lines in. Juneau, Petersburg, and Wrangell lost Fredrick Sound in 1991 when they took the first 10 days of fishing in October away, which really hurt the Fredrick Sound trollers.

In closing I would like to bring up a couple more things: The Yakutat AC says that the Board of Fish approved their original 2003 proposal, but that the wrong lines were put into regulation. I do not agree with this. I was at the Board of Fisheries meeting and the Yakutat AC asked that the regulation be changed so that the existing line would be shown as a Loran line, which is exactly what the Board voted to do. I supported that, as did many trollers, but we did not support moving the line further out.

Another interesting point is that they have waited 13 years to bring this up and it coincides with the arrival of the new state trooper who has been citing for fishing over the line.

The above examples are the reason I feel the line should not be moved.

Thank you for your consideration.

Mark Roberts

Mark Roberts
P.O Box 246
Petersburg AK 99833

Cell 907 518-0245

1/7/2015

Dear Board of Fish,

Proposal 220

We the undersigned are against proposal 220. This proposal will move the Yakutat winter fishery line out and allocate to much of the winter quota to a small amount of trollers

Name	Town
thay are all trollers	
David L [illegible]	Petersburg 01-07-2015
[illegible]	Petersburg AK
Charles E [illegible] [illegible]	Petersburg, AK
[illegible]	PSG. AK
[illegible]	Psg. AK.
Chris Whittinger	PSG AK
Kurt Wallhart	PSG AK.
PAT McGRATH	PSG AK
Bill [illegible]	PSG AK
Michael Medeln	PSG AK
[illegible] JEFF ROBINSON	PSG AK
[illegible]	Petersburg, AK
G P Merry GPM MERRIGAN	PETERSBURG AK
Jeff Pfundt	Petersburg AK
Charles E Harris	PETERSBURG AK
James [illegible]	Petersburg AK
James H. Bird	Petersburg AK

1/7/2015

Dear Board of Fish,

Proposal 220

We the undersigned are against proposal 220. This proposal will move the Yakutat winter fishery line out and allocate to much of the winter quota to a small amount of trollers

they are all Trollers Name	Town
Jack C Lyons	Petersburg, Alaska
Drake Lyons	Petersburg, AK
Andy Wright	Petersburg AK
[illegible]	Petersburg AK
[illegible]	PETERSBURG AK
[illegible]	PETERSBURG, AK
[illegible]	Petersburg, AK.
[illegible]	Box 205 Petersburg AK
[illegible]	Box 457 Petersburg AK
[illegible]	Box 1344 Petersburg AK
[illegible]	Box 716 Petersburg AK
[illegible]	[illegible] Petersburg, AK Area
[illegible]	Petersburg
[illegible]	Petersburg
[illegible]	PSG
[illegible]	PSG Box 1224
[illegible]	PSG Box 1550
[illegible]	PSG Box 1267

1/7/2015

Dear Board of Fish,

Proposal 220

We the undersigned are against proposal 220. This proposal will move the Yakutat winter fishery line out and allocate too much of the winter quota to a small amount of trollers

Name	Town
	KAKE
	PSG
	PSG

Lori Roberts

From: Hagerman, Grant T (DFG) <grant.hagerman@alaska.gov>
Sent: Friday, January 23, 2015 8:39 AM
To: capecross@gci.net
Subject: RE: Yakutat winter troll CPUE

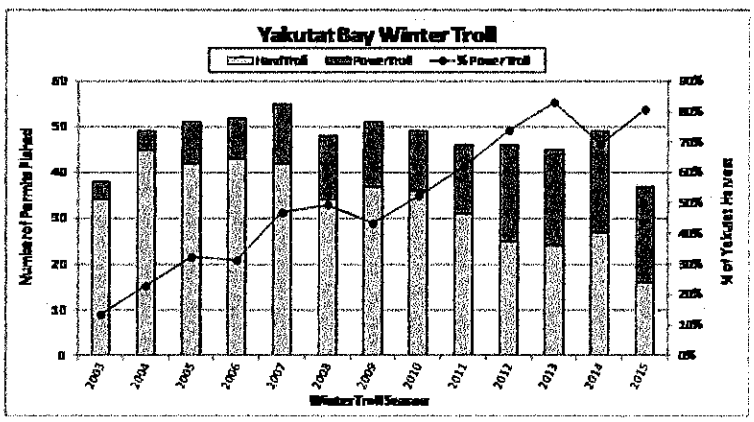
Just making sure you got this, Mark. I can resend if you like, looks like the data turned out looking quite dark in the message.

Grant

From: Hagerman, Grant T (DFG)
Sent: Wednesday, January 21, 2015 9:10 AM
To: 'capecross@gci.net'
Subject: RE: Yakutat winter troll CPUE

Mark,
Here is the permit and percent of PT harvest data from Yakutat winter troll since 2003. Definitely a trend of increasing PT.

	PERMITS FISHED			
	Power Troll	Hand Troll	PT harvest	% Power Troll
2003	4	34	628	15%
2004	4	45	1,260	29%
2005	9	42	1,795	32%
2006	9	43	1,302	31%
2007	13	42	1,622	47%
2008	14	34	1,376	49%
2009	14	37	1,314	43%
2010	13	36	1,952	52%
2011	15	31	3,610	62%
2012	21	25	3,539	74%
2013	21	24	3,755	83%
2014	22	27	4,105	69%
2015	21	16	1,749	81%
2003-2014 avg	14	34	2,116	50%

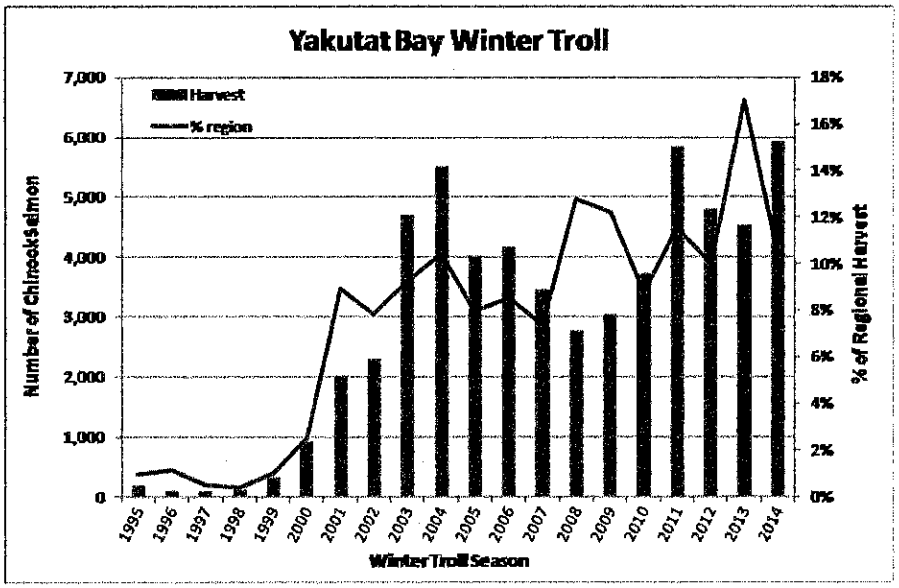


From: Hagerman, Grant T (DFG)
Sent: Tuesday, January 20, 2015 4:04 PM
To: 'capecross@gci.net'
Subject: Yakutat winter troll CPUE

Hi Mark,

Pattie forwarded on your request for Yakutat winter data. Below is the first part of your request, the CPUE and harvest by year. I'll send the permit fished data for PT tomorrow.

	Year	Harvest	Days fished	CPUE	% region
	1995	177	66	3	1%
	1996	108	29	4	1%
	1997	107	33	3	1%
	1998	126	72	2	0%
	1999	315	105	3	1%
	2000	917	320	3	3%
	2001	2,021	477	4	9%
	2002	2,312	459	5	8%
	2003	4,705	671	7	9%
	2004	5,521	903	6	10%
	2005	4,016	1,036	4	8%
	2006	4,171	1,253	3	9%
	2007	3,459	996	3	7%
	2008	2,781	828	3	13%
	2009	3,030	737	4	12%
	2010	3,730	857	4	9%
	2011	5,848	882	7	12%
	2012	4,794	904	5	10%
	2013	4,523	870	5	17%
	2014	5,930	881	7	10%
1995-2002 avg		760	195	4	3%
2003-2014 avg		4,376	902	5	10%



Grant Hagerman
Assistant Troll Management Biologist
Alaska Dept. Fish and Game- Sitka
Business- (907) 747-6688
grant.hagerman@alaska.gov

Submitted By
Kenneth Jones
Submited On
2/9/2015 2:48:19 PM
Affiliation

Phone
907.235.6417
Email
ken_jonz@hotmail.com
Address
PO Box 1044
Homer, Alaska 99603

Oppose Proposals #114, 115, 116, 118, 119, 120 & 121

Favor Proposal #117

Board of Fisheries

Vice Chairman Phil Kluberton & Board of Fisheries Members

via fax: 907.465.6094

via web: www.boards.adfg.state.ak.us/

I am opposing all proposals to modify the herring fishery. I am supporting proposal #117. The State must insist upon accurate, verifiable data surrounding the subsistence harvest.

It is tempting and probably intelligent to stick with the standard pro/con in evaluating these proposals. At a time on this small planet when there are roughly a dozen civil wars going on and terrorists are beheading people can we really argue about moving a line for subsistence harvests without seeming a bit petty?

Subsistence is important and a substantial core area was established three years ago. There is no scientific, nor tenable reason to further increase the area set aside for subsistence.

As a Sitka Sound herring seiner, I support subsistence harvest. Is it my hope that STA is able to acknowledge it is not their goal to eliminate or incapacitate the commercial herring fishery in Sitka Sound. If each side were to respect the other, conflict could stop, all involved could get on with the business of feeding ourselves and making a living.

Sincerely,

Kenneth Jones

PO Box 1044

Homer, AK

907.399.1323

Submitted By
Kenneth Jones
Submited On
2/9/2015 2:50:00 PM
Affiliation

Phone
907.235.6417
Email
ken_jonz@hotmail.com
Address
PO Box 1044
Homer, Alaska 99603

Proposal #202 - Oppose

Proposal #275 - Favor

Board of Fisheries

Vice Chairman Phil Kluberton & Board of Fish Members

via fax: 907.465.6094

via web: www.boards.adfg.state.ak.us/

There is no reason to have seine vessel lengths differ by regulatory area.

There is no reason to confuse the issue of boat length by involving the federal government or coast guard.

Keep this regulation as simple as possible. Follow the Bristol Bay example. Define what an anchor roller is (Proposal #275). and speceify the allowable length that it can exceed beyond the 58" vessel length. 12 inches. Proposal #275 addresses this.

Require any boat that registers for salmon seining in Alaska to be available to be measured by troopers prior to and/or during the fishery.

Job Done!!

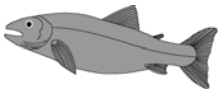
Sincerely,

Kenneth Jones

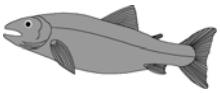
PO Box 1044

Homer, AK

907.299.1562



Kathy's Net Loft & Gear Supplies
Kathy & Ed Hansen
9369 North Douglas Highway
Juneau, AK 99801
(907) 586-6652 Fax: (907) 523-1168
E-mail: gillnet@ak.net



February 9, 2015

Alaska Department of Fish and Game
Tom Kluberton, Vice-Chairman
PO Box 115526
Juneau, AK 99811-5526

RE: Southeast & Yakutat Finfish Proposal# 210

Dear Vice-Chair Kluberton and Board of Fish Members,

Kathy's Net Loft and Gear Supplies submitted and supports this proposal for the use of single-filament (mono) gear in the Southeast Alaska drift gillnet fisheries.

Our customers support the idea of having the choice to use single-filament gear for a variety of reasons but cost is the main one. For example in 2015 you could purchase mono gear for $12.55lb while the multi-twist Momoi Mt gear is $14.65 lb or MST gear is $18.60 lb and 6-strand gear (MA6) is $19.00 lb with highest cost Yamaji Peak gear at $24.50. For a bale of equivalent gear (110 str fms or approximately 55 hung fathoms) the mono gear is $307.50; the MA6 gear would be $475.00 and the PEAK gear would be $588.00.

Another reason is that in several of the fishing areas there is what fishermen call "slime" in the water column that gets on the net. The slime gets between the filaments in multi-strand making it harder to keep clean and severely reducing the fishing ability of the net. We believe that single-filament gear will shed the slime easier. The following link will take you to a short U-tube video of slime on a net https://www.youtube.com/watch?v=5XxTZC2ijgA .

Alaska Department of Fish and Game did a gillnet evaluation in 1987 which is included as attachment A. This study shows that single-filament gear is substantially more efficient on pink salmon in which

the gillnet fleet is behind on their allocation of and no noticeable difference on sockeye salmon. The study went on to imply that there was a difference between multi-strand and six strand gear with coho salmon and that adjustments to the long term data base would be necessary because the gillnet coho CPUE is used as an indicator of abundance but the further studies that were determined to be necessary were never conducted and the multi-filament and six strand are both legal gear used in the fishery with no indication of how much of one type of gear is used versus the other. How would this situation be any different than if single-filament gear was added as a choice where some fishermen were using it and some weren't?

We have contacted the Upper Cook Inlet management biologist and discussed the use of single-filament web in the Cook Inlet fisheries. When the Board of Fish first approved the single-filament web in 2005, they put a three year sunset period on its use as well as a limit of no more than one-third of the total allowable gear could contain single-filament web. During this time, ADF&G did not do any studies to determine the catch differences between gear or manage their fishery differently than normal. They did hear from fishermen at the 2008 Upper Cook Inlet Board of Fish meeting from fishermen that they either really liked the gear or really hated the gear but it had economic cost benefits.

There was a study that was passed around at the Prince William Sound meeting from the Wildlife Conservation Society titled Review of Seabird Bycatch in Set-Gillnets with Specific Reference to Mitigating Impacts to Yellow-billed Loons (Bentzen, Rebecca & Robards M. D. 2014). We have reviewed this document and upon close inspection of this study there are no definitive studies or conclusions that single-filament web would be more harmful to seabird or marine mammals than the current legal gillnet gear in Southeast Alaska . There is only speculation that it might occur. The same situation is true in the Board of Fish comments submitted by National Marine Fisheries Service (NMFS) in opposition to proposals #209 & #210. The NMFS comments are all speculative in nature, they use throughout the comments the phrase "may result" in greater entanglement or other such statements. The report does go on to say on page 14 that, *" Overall in Alaska, there is little overlap between the commercial gillnet fisheries and loons or eiders; the Alaskan commercial fisheries in the Gulf of Alaska and Southeast Alaska primarily operate during the summer when adults and some proportion of immature birds have moved north to Arctic habitats, limiting their impact (Federal Register Notice Vol. 74 No. 56 March 25, 2009).*

Based on the strong support by fishermen in Southeast Alaska, the information learned from Upper Cook Inlet fisheries, that the bycatch concerns raised are speculative in nature and the Department has been able to adjust without changing time or area in the gillnet fishery when the more efficient six-strand gear was approved we recommend that the Board approve the use of single-filament web in Southeast Alaska. We also recommend that the following three criteria be adopted with this proposal:

1. Make the regulation effective on January 1, 2016
2. Sunset Clause for reconsideration in three years at the next Board of Fish meeting
3. Registration required with the area management office for the district you will be fishing in if you have any single-filament gear in your net. This requirement would allow the local area management biologist to be able to know which fish tickets might be influenced by the use of mono in the net.

Thank you for your consideration of our comments. We will be at the meeting and able to provide additional information on this proposal.

Sincerely,

Kathy & Ed Hansen, Owners
Kathy's Net Loft and Gear Supplies

GILLNET GEAR EVALUATION STUDY

IN SOUTHEAST ALASKA, 1987

By

Marianna Alexandersdottir,

Joseph Muir

and

Brian Lynch

Regional Information Report[1] No. 1J88-19

Alaska Department of Fish and Game
Commercial Fisheries Division
Juneau, Alaska

September 1988

[1] The Regional Information Report Series was established in 1987 to provide an information access system for all unpublished divisional reports. These reports frequently serve diverse ad hoc informational purposes or archive basic uninterrupted data. To accommodate needs for up-to-date information, reports in this series may contain preliminary data.

AUTHORS

Marianna Alexandersdottir is the Region I Biometrician for the Alaska Department of Fish and Game, Division of Commercial Fisheries, P. O. Box 20, Douglas, Alaska 99824.

Joseph J. Muir is the Assistant Juneau Area Management Biologist for the Alaska Department of Fish and Game, Division of Commercial Fisheries, P. O. Box 20, Douglas, Alaska 99824.

Brian Lynch is the Assistant Petersburg Area Management Biologist for the Alaska Department of Fish and Game, Division of Commercial Fisheries, P. O. Box 667, Petersburg, Alaska 99833.

ACKNOWLEDGEMENTS

The authors are grateful to Jev Shelton, Jack Pasquan, Paul Southland, Bill Byford and John Emde for their cooperation and skillful handling of the chartered vessels used in the test fishery. Particular thanks are due to Mark Anderson, Kurt Kondzela, Margaret Byford, Kim Fisher and Julie Kittams for their dedication in measuring and weighing fish around the clock and in very rough seas.

PROJECT SPONSORSHIP

This investigation was financed by NOAA, National Marine Fisheries Service, under Cooperative Agreement No. NA-87-ABH-00025.

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ABSTRACT

Four test fisheries were conducted in Southeast Alaska in 1987. The objective was to compare the efficiencies of four different mesh types including multifilament, mono-twist with center core, six-strand monofilament and single-strand monofilament. The experiments were conducted in two districts, glacial and clear water, and in two time periods, summer for sockeye and pink salmon and fall for coho and chum salmon. The results showed a general increase in efficiency with six- and single-strand mesh. Analysis of variance tests shows that single-strand was significantly more efficient in catching pink salmon in both districts, and that six- and single-strand were significantly more efficient for coho and chum salmon in the clear water district. No significant differences were found for sockeye salmon.

KEYWORDS: Salmon, Southeast Alaska, gillnet mesh efficiency.

INTRODUCTION

The most important factors associated with gillnet selectivity are: mesh size, elastic stretching of the net, inelastic stretching of the net (including stretching of the knots), hanging ratio of the net, strength and flexibility of the twine, and visibility of the twine (Clark, 1960). Other than mesh size, the most important characteristics of a gillnet are its visibility, stretchability of mesh, and tangling capacity (Hamley, 1975). Differences between gear types in the construction of the mesh may translate into differences in efficiency.

Prior to 1960, Alaska did not have any gillnet mesh regulations and all types of gear were legal. After statehood, monofilament nets became illegal. From 1960 to 1978 monofilament gear was not allowed, and was defined as any net which had any single filament of more than 50 denier (50 grams/900 meters of filament). Legal nets were those which had mesh comprised of many small fibers or strands. In 1978, the Alaska Board of Fisheries redefined a legal net as one whose "gillnet must contain no less than 30 strands." The new regulation eliminated any reference specifying individual fiber diameter. Consequently gear was developed which contain 30 strands, but of unequal sizes. The most common of this new type of gear was "mono-twist with center core", which had a core strand comprised of 24 very fine filaments around which a minimum of 6 heavier strands were wrapped. This gear was very similar to the traditional multistrand monofilament nets used in other areas of the country, but cost substantially more. Recognizing the physical similarities between "mono-twist with center core" gillnet mesh and the less expensive six-strand monofilament gillnet, the Alaska Board of Fisheries legalized six-strand monofilament gillnet gear in several areas of the state, including Southeast Alaska, beginning in 1988. The new regulation stated legal gillnet web must contain at least 30 filaments of equal diameter, or the web must contain at least 6 filaments each of which must be at least .20 millimeter in diameter.

Southeast Alaska has 4 distinct drift gillnet salmon fisheries located in regulation districts 101, 106 and 108, 111, and 115 (Figure 1). Gillnet catch-per-unit-of-effort (CPUE) is used by the Department of Fish and Game as a major indictor of the strength of the salmon returns and is used to manage these fisheries. Inseason CPUE is compared to historical averages to decide weekly gillnet fishing time and areas opened to gillnet fishing. In addition, gillnet coho salmon CPUE is monitored by the Department as an indication of coho salmon abundance in the inside waters of Southeast Alaska, and is used as a data base to manage the outside troll coho salmon fishery.

As a result of the recent gear changes in the Southeast Alaska gillnet fisheries, it is unknown to what extent salmon CPUE patterns during the past few years are reflective of changes in gillnet gear efficiency and therefore not reflective of run strength. In order to standardize inseason and historical CPUE to more accurately manage the Southeast Alaska's gillnet fisheries and outside coho salmon troll fishery, the Alaska Department of Fish and Game conducted a gillnet gear evaluation study during 1987.

The purpose of this study was to examine the effects of four different gillnet web materials upon catch rates, size selectivity and sex composition of sockeye and coho salmon, utilizing the gillnet mesh sizes commercially used to harvest each species. In order to determine the effect of water clarity and visibility on the catch rates of the gear types, the study was carried out in glacial and clear water sites and over 24-hour fishing periods in each of the four weeks of the study.

The center-core and six-strand meshes were assumed to be more efficient compared to the older commercially used multifilament gear, and a factor of relative efficiency was therefore assumed to be needed to adjust historical CPUE databases. Single strand monofilament was included as the fourth mesh type. Although it is commonly used in other states it is not a legal gear type in Alaska.

METHODS

The study was conducted in two separate gillnet fishing districts in Southeast Alaska. Gillnet districts 111 (Taku/Snettisham) and 106 (Sumner Straits) were selected to represent glacial and clear water conditions respectively (Figure 2). Two test boats were chartered for a full 24-hour period each week for four weeks in District 111 and 106 during the peak of each district's sockeye and pink salmon returns and for another four weeks during each district's coho and fall chum salmon return. Four individual experiments were conducted, where one experiment comprised four weeks of test fishing in one district. Thus two experiments, summer and fall, were conducted in each of two districts.

Sampling Methods

Each vessel fished a 200 fathom net comprised of four different 50 fathom panels of gillnet web with hanging ratios of web to corkline of 2.2 to 1. Gillnet mesh size used during the sockeye and pink salmon fishery was 5 1/4", while that for the coho and fall chum salmon was 6 1/4". Mesh size was based on net manufacturers stretch measurement made with dry web material. Mesh color and thread size matched that which is currently used in each area as suggested by local net distributors. The 5 1/4 " nets fished in Districts 111 and 106 used 85 lbs and 95 lbs of leadline, respectively, per 100 fathoms of net. Cork spacing on the corkline was 42" center to center. The 6 1/4" nets used 120 and 110 pounds of leadline per 100 fathoms of net, with cork spacing every 36".

The panels in each net were comprised of the following types of gillnet mesh:

1. Multifilament nylon with 30 strands (Uroko "2000"), referred to as multifilament in this report.
2. Mono-twist with center core (Uroko "Diamond"), referred to as center-core.
3. Six-strand monofilament (Uroko), referred to as six-strand.
4. Single strand monofilament (Uroko), referred to as single-strand.

Within each net, panels were separated by five fathom spaces to avoid panels leading fish to adjacent panels. Panels were ordered randomly at the beginning of each 24 hour fishing period, and re-ordered randomly approximately half-way through the 24 hour fishing period. When setting the nets, the end panels were alternated in relationship to the beach in an attempt to reduce any catch bias caused by fish leading the shore.

Species, sex, length and weight were recorded for each fish caught by panel type for each set. The time when the net was set, the time each panel started to come into the boat, and the time each panel was completely onboard were recorded. Fishing time was defined as that period from when the first float left the vessel to when the last float was reeled back on the boat, and was calculated as:

$$T = (tin1 - tout) + 0.5(tin2 - tin1)$$

where,

T = fishing time in hours

tout = time first float of net leaves the boat

tin1 = time panel starts coming into boat

tin2 = time panel totally on the boat.

The method by which each fish was caught in the web, and those which dropped out, was recorded. The method of entanglement was divided in the following categories:

1. Drop outs
2. Those fish caught only by mouth or maxillary = tangled.
3. Those fish caught past their gills or gill plates = gilled.
4. Those fish caught past the head = wedged.

Analysis Methods

All data were entered on micro-computers using LOTUS 1-2-3 (LOTUS 1985) software; statistical analyses was conducted on a VAX mini-computer using SAS statistical software (SAS 1985a,b). The experimental design was a randomized complete block design with two- and three-way factor analysis. Analyses were carried out for each species and for males and females separately and combined. Two and three-way analyses of variance (ANOVA) were used to examine the effect of gear type on three dependent variables (Table 1), which were:

1. Length (mm)
2. Sex-ratios
3. Catch rates.

The data were blocked by sets within boats, as the catch rate was highly variable between sets. The analysis for catch rates and sex-ratios were conducted as 3-way analysis for the summer experiments, with week, period and mesh type as the three factors (Table 1). In the fall fisheries, period was not included as a factor as few or no night sets were taken, and the analysis became a 2-way study. Boats and sets within boats were considered random effects, as were weeks, while period and mesh type were fixed. The analysis of length included week, mesh type and entanglement mode as factors in a 3-way study, and entanglement mode was treated as a fixed effect in the model. The F-ratios used (Table 1) for testing the hypothesis were determined for this mixed model using procedures outlined in Zar (1984). Multiple comparisons of mesh types were made using the Tukey-Kramer test (Neter and

Wasserman 1974, SAS 1985b p. 470-476), and the maximum experimentwise error rate was controlled to 5% (= 0.05).

Chi-square tests were used to determine whether there was any effect of mesh type on the mode of fish entanglement. The number of fish caught by each entanglement method was compared for each mesh type to the average distribution for all mesh types combined. The significance probabilities (p) are reported for all of these tests in the results. For the purposes of this report significant probabilities of less than 0.05 were considered statistically significant.

Relative Gear Efficiency

The estimation of relative gear efficiency was an important objective of the study. Collins (1987) in a similar study derived a net efficiency factor as a ratio of catch rates such that,

$$R = r \times F (M, q_2, E, r),$$

where,

R = ratio of catch rates
r = "true" efficiency factor
M = natural mortality
q_2 = catchability of mesh type 2
E = effort,

and F(M, q_2, E, r) is a function of r, mortality, catchability and effort.

When effort is small then,

$$R \doteq r$$

The ratio R is calculated as a ratio of CPUE for the mesh types being compared,

$$R = C_1 / C_2,$$

where,

C_1 = catch per hour fished for mesh type 1
C_2 = catch per hour fished for mesh type 2.

The mean ratio R was calculated for center-core (C_1), six-strand (C_1) and single-strand (C_1) compared to multifilament (C_2), and also for six-strand (C_1) compared to center-core (C_2) using CPUE values summed for each boat and week. The average ratios (R) were calculated,

$$R = 1/n \quad S \quad R_{ij}$$

where,

R_{ij} = ratio of CPUE values for 2 mesh types for week i and boat j.
n = the number of weeks x boats.

with variance,

$$Var (R) = s^2 / n$$

where

s^2 = variance of R_{ij}.

These ratios and their 95% confidence intervals were calculated. A ratio of one would indicate that there was no difference between the two mesh types being compared. Therefore, the results of the ANOVA tests comparing mesh types were first examined and the ratios calculated only for those mesh types which were found to be significantly different.

RESULTS

The 1987 test fishery was conducted in Taku Inlet and Sumner Strait during the weeks from July 9 to July 31 (Summer fishery), and during the weeks from August 27 to September 18 (Fall fishery). In Sumner Strait the summer fishery occurred from July 8 to July 30 and the fall fishery from August 20 to September 2. Sockeye and pink salmon were the major species caught during the summer test fishery; coho and chum salmon were dominant during the fall test fishery (Table 2).

A total of 1,476 sockeye salmon were taken during the summer fishery in Taku Inlet in 74 sets, and 874 sockeye were caught in Sumner Strait in 97 sets. An additional 4,933 pink salmon were taken in Taku Inlet and 1,676 pink salmon in Sumner Strait. In the fall 466 coho salmon were taken in Taku Inlet in 66 sets, and 478 coho salmon in Sumner Straits in 96 sets, with 1,094 chum salmon taken in Taku Inlet and 293 in Sumner Strait.

In Taku Inlet the catch of sockeye and pink salmon peaked in the second week (July 16), but in the first week in Sumner Strait (July 2). In the fall, coho and chum salmon were most numerous during the last week of the test fishery in Taku Inlet (September 17), and coho salmon were most numerous in the second week in Sumner Strait (August 26). Chum salmon were not caught in great numbers in any week in Sumner Strait (Table 2). The results presented here are for sockeye and pink salmon caught in the summer fishery, and for coho and chum salmon taken in the fall fishery.

Sex Ratios

The comparison of percent males in the catch did not show any significant differences between mesh types (Table 3). However, in Sumner Strait the F-statistic for the boat-effect was significant for all species; there was a significant difference in the male to female sex-ratios between the two boats fishing. Although the sample sizes were small, the number of fish per set averaged 3 to 18 fish in Sumner Strait (Table 4). This difference in sex-ratios may have been due to incorrect sexing of the salmon on-board, hence the data for Sumner Strait were combined for comparison of the catch rates of salmon. In addition, some samples of pink salmon in Taku Inlet were not separated by sex and these were also combined for analyses.

Length and Method of Entanglement

The average length for sockeye salmon ranged between 580 and 598 mm in the experiments (Table 5) and did not differ between Taku Inlet and Sumner Strait (Figure 3). Pink salmon were, on the average, larger in Sumner Strait (520 mm) compared to Taku Inlet (490 mm). In the fall fishery coho salmon and chum were larger in Taku Inlet compared to Sumner Strait. Coho Salmon averaged 660 mm in Taku Inlet and chum salmon averaged 650 mm, while in

Sumner Strait coho salmon averaged 640 mm and chum salmon 640 mm (Table 5). No significant differences were found comparing the average size of salmon caught by the four mesh types in each experiment (Table 6).

Comparison between weeks fished indicated that in four cases, pink salmon in Taku Inlet, female pink salmon in Sumner Strait, male coho salmon in Sumner Strait and female chum salmon in Taku Inlet, the mean size was significantly different between the weeks fished (Table 6). Ninety-five percent confidence intervals were calculated for these cases (Table 7). These indicated that for pink salmon in District 111 the average size was larger in the first week compared to the later weeks, and that there was an apparent increase in size for male coho in District 111 and female chum salmon in District 106 over the weeks. These differences could be due to several factors, including:

1. the increase in fish size due to growth over the weeks,
2. changes in body configuration as the males develop spawning characteristics in the later weeks, such as an increase in the girth to length ratio and kype development, and
3. size differences due to changes in stock composition over the four week period of the study.

In all cases the average size of fish was significantly larger for tangled and gilled fish compared to wedged fish (Figure 4). The dominant mode of entanglement differed between species and location (Table 8). Sockeye salmon were gilled more frequently in both locations, with a higher percentage of females wedged compared to the males. Pink salmon were wedged over 80% of the time in both areas. The 5 1/4" mesh used during the summer was "sockeye gear"; that is, it targeted sockeye salmon. Sockeye salmon length frequencies averaged around 590 mm in this gear (Table 5). Pink salmon are much smaller (Table 4), and so would be expected to wedge more easily. In the fall, coho and chum salmon were gilled most frequently in Taku Inlet, but were wedged more frequently in the nets in Sumner Strait (Table 8). Again, this was probably a function of size as Sumner Strait coho and chum salmon were smaller than Taku Inlet coho and chum salmon (Figure 3).

The number of drop-outs was included in the data collected for each mesh type. However, very few drop-outs were actually recorded during the fisheries and this "entanglement mode" was not included in the analysis.

Comparison of the number of fish caught by each entanglement method were significant for sockeye salmon in both locations and pink salmon in Taku Inlet (Table 9). In all cases, these significant tests appeared to be due to the fact that the single strand gear had a higher percentage of fish wedged in the net.

Catch Rates

Examination of the observed distribution of catch per hour fished indicated that it tended to be skewed to the right. A log-transformation was used to normalize the data prior to the analysis, and the mean CPUE and 95% con-

fidence intervals were calculated using log-transformed data and the mean and confidence interval transformed back to the original variable (Table 10 and 11, Figure 5). Although there seemed to be a general trend in CPUE with multifilament being the least efficient and single strand the most efficient (Figure 5), the results of the statistical analyses comparing the CPUE between mesh types differed depending on the species and areas fished (Table 12).

Sockeye Salmon

Total mean CPUE for sockeye salmon ranged from 1.7 to 2.6 fish per hour in Taku Inlet (Figure 5), with peaks of 5.2 to 11.3 fish per hour in the second week (Table 10). In Sumner Strait the mean CPUE ranged from 1.3 to 1.6; the peak catches occurred in the first week, ranging from 4.1 to 10.6 fish per hour fished. The results from the ANOVA showed no significant differences in CPUE between mesh types for sockeye salmon (Table 12).

Pink Salmon

The CPUE for pink salmon (Figure 5) was found to differ significantly between mesh types in Taku Inlet (Table 12). The CPUE ranged from 5.8 to 11.1 fish per hour in Taku Inlet and 1.3 to 4.0 fish in Sumner Strait (Table 10). The single strand gear was the most efficient type of mesh for catching pink salmon in both areas and was significantly different from multifilament and center-core gear in Taku Inlet (Table 13).

The relative efficiencies of these mesh types for pink salmon ranged from 1.3 to 2.2 in Taku Inlet and 1.0 to 3.0 in Sumner Strait (Table 14). The single strand gear was twice as efficient as multifilament gear in Taku Inlet (Table 14) and three times as efficient as multifilament in Sumner Straits (Figure 6).

Coho Salmon

The CPUE values were relatively low in all weeks for coho salmon (Table 11), with the means ranging from 0.8 to 1.1 in Taku Inlet and 0.5 to 1.2 in Sumner Strait (Figure 5). The results of the ANOVA tests for coho salmon differed between Taku Inlet and Sumner Strait (Table 12). In Taku Inlet, a glacial environment, no significant differences were found in CPUE between the mesh types (Table 12). In the clear water area, Sumner Strait, a significant difference in CPUE was found for coho salmon (Table 12), where single strand gear was significantly more efficient than multifilament, but no other comparison was significant (Table 13).

The relative efficiencies of mesh types ranged from 1.3 to 1.8 in Taku Inlet and from 1.2 to 2.6 in Sumner Strait (Table 14). In Sumner Strait the single strand was almost three times more efficient than the multifilament (Figure 6).

Chum Salmon

The mean CPUE ranged from 1.5 to 2.1 for chum salmon in Taku Inlet and from 0.3 to 0.8 in Sumner Strait (Figure 5). In Taku Inlet a high catch occurred in the fourth week (3.4 to 5.6 fish per hour), but no similar peak occurred in Sumner Strait where catches remained low for the duration of the test fishery (Table 11). In Taku Inlet there was a significant difference in CPUE between mesh types for female chum salmon (Table 2), but none of the pairwise comparisons were significant (Table 13). In Sumner Strait the ANOVA tests were significant and the pairwise comparisons showed that single strand was significantly more efficient than multifilament.

The relative efficiencies for chum salmon in Sumner Strait indicate that single strand gear is over three times as efficient as multifilament (Figure 6); however, the CPUE values were very low for chum salmon in all weeks in Sumner Strait.

DISCUSSION

There was a trend towards increasing efficiency across the gear types included in this study, with multifilament mesh the least efficient and single-strand the most efficient. Generally, CPUE and gear efficiency increased as the number of strands decreased in the web (Figure 6). Water clarity, time of day, the species and the sex of the fish, and behavioral and morphological differences were all variables which effected the efficiency of each mesh type. The results of these studies seem to agree with Ali (1984) that the greatest factor influencing the efficiency of gear types is water clarity. Gear efficiency also increases as the number of strands decrease, and the transparency of gillnet gear is closely correlated to the number of strands which comprise the gear twine.

The results of this study are also similar to those found for sockeye salmon in a gillnet study conducted in Bristol Bay in 1984 (Bue 1986). Bue compared multifilament nylon to center-core gear and found that center-core caught significantly more sockeye salmon in clear water compared to the multifilament gear. Although the sockeye salmon results did not follow the same pattern in Southeast Alaska, the coho and chum salmon results did. The trends for these two species showed larger differences between gear types in Sumner Strait, which has clearer water than Taku Inlet (Figures 5 and 6).

The largest amount of variation in all of these studies occurred among the individual sets themselves. This variability, which is inherent in any field study of this kind, must complicate the task of measuring differences in efficiency between gear types and estimating the relative efficiencies of different mesh types. It is even more difficult to apply the results to the fisheries, as the variation among the fishermen will be greater than the variation measured between sets or boats in a controlled test fishery.

Catch rates for sockeye salmon were not significantly different between the gear types compared in this study, neither in the clear water areas nor in the glacial fishing areas (Table 13). The single strand monofilament gear caught more pink salmon independent of water clarity. The mesh size used was not an optimum size for harvesting pink salmon; most of the fish were wedged in the nets (Table 8). The results might be different with smaller mesh sizes in a directed pink salmon fishery. Coho and chum salmon were caught more efficiently in single-strand gear in clear water conditions, but not in glacial conditions (Figure 6). No difference was found between the recently legalized six-strand monofilament nylon gear and the mono-twist with center-core used commercially for the past several years (Figure 6). The six-strand gear did appear to be twice as efficient as the multifilament in clear water (as represented by the Sumner Strait results Figure 6), but our results were inconclusive, probably due to low catch rates and small sample sizes.

The implication for management of these results are important. In all cases where significant differences were found, single strand was more efficient than the other gear types. This gear is not legal in Southeast Alaska. If it were to become legal for use in the region's gillnet fisheries extensive adjustments would be needed to standardize the catch and effort data bases.

Gillnet fisheries in Southeast Alaska are, in some locations and for some species, U.S./Canada Treaty fisheries. In the case of coho salmon the gillnet CPUE is used as an indicator of abundance and it is important that the historical data base be comparable to inseason CPUE. The results indicate that the six-strand gear may be more efficient than the older multifilament gear for coho salmon in clear water fisheries. In order to address this problem additional study is planned in Sumner Strait, which will focus on the two gear types, multifilament and six-strand, to hopefully provide a more precise estimate of relative efficiency by increasing the samples sizes.

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Table 1. Model used for Analysis of Variance in 1987 Test Fishery (Zar, 1984).

Model.

$$Y_{ijklm} = \mu + A_i + B_{j(i)} + C_k + D_l + E_m + (CD)_{kl} + (CE)_{km} + (DE)_{lm} + (CDE)_{klm} + e_{(ijklm)}$$

Source of Variation	Model	Effect	F-ratio
Boats	A_i	Random (Block)	MS_A/MS_B
Sets	$B_{j(i)}$	Nested in boats	$MS_B/MS_\bullet$
Weeks	C_k	Random	$MS_C/MS_\bullet$
Period[a]/Entanglement[b]	D_l	Fixed	MS_D/MS_{CD}
Mesh Type	E_m	Fixed	MS_E/MS_{CE}
C x D			$MS_{CD}/MS_\bullet$
C x E			$MS_{CE}/MS_\bullet$
D x E			MS_{DE}/MS_{CDE}
C x D x E			$MS_{CDE}/MS_\bullet$
Error	$e_{(ijklm)}$		

a) Period: 1=day, 2=night
This factor is included in analysis of catch rates and sex ratios in summer experiments. In fall experiments analysis of catch rates and sex ratios this factor (D) is eliminated and the analysis is a two-way study, with the effects CD, DE and CDE also eliminated.

b) Entanglement mode: 1=tangled, 2=gilled, 3=wedged.

c) Mesh type: 1=multifilament nylon, 2=monotwist center core, 3=six-strand monofilament, 4=single strandmonofilament.

Table 2. Number of Sets and Catch in Test Fishery 1987.

	Number of Sets	Chinook Salmon	Sockeye Salmon	Coho Salmon	Pink Salmon	Chum Salmon
Taku Inlet						
Summer - Week 1	22	18	167	4	1265	72
2	8	1	563	24	1158	171
3	23	4	404	8	1603	166
4	21	1	344	36	907	74
Total	74	24	1476	72	4933	483
Fall - Week 1	17	4	6	36	2	173
2	17	0	4	171	0	192
3	19	0	2	105	0	246
4	13	0	2	154	0	483
Total	66	4	14	466	2	1094
Sumner Strait						
Summer - Week 1	19	0	193	19	635	8
2	25	1	206	39	344	49
3	23	0	261	26	325	43
4	25	0	214	27	372	74
Total	92	1	874	111	1676	174
Fall - Week 1	24	0	20	122	11	77
2	48	0	5	264	15	139
3	24	0	0	92	3	77
Total	96	0	25	478	29	293

Table 3. Results of ANOVA Comparing Percent Males Between Mesh Types in 1987 Test Fishery.[a]

	Taku Inlet	Sumner Strait
Sockeye Salmon		
Boat	p = .54	p = .07
Week	p = .49	p = .13
Day	p = .50	p = .70
Mesh Type	p = .42	p = .60
Pink Salmon		
Boat	p = .28	p < .001
Week	p = .70	p = .02
Day	p = .38	p = .54
Mesh Type	p = .11	p = .30
Coho Salmon		
Boat	p = .55	p = .04
Week	p < .001	p = .22
Mesh Type	p = .73	p = .34
Chum Salmon		
Boat	p = .34	p = .004
Week	p = .94	p = .10
Mesh Type	p = .34	p = .79

[a] P is the significance probability. Significance probabilities of less than 0.05 were considered significant.

Table 4. Number of Sets and Average Fish Per Set in 1987 Test Fishery.

	Taku Inlet		Sumner Strait	
	Summer	Fall	Summer	Fall
Sets	74	66	92	96
Sockeye Salmon				
Total	1471	3	874	25
Fish/Set	20	<1	9	<1
Pink Salmon				
Total	3935	13	1672	29
Fish/Set	53	<1	18	<1
Coho Salmon				
Total	72	462	111	478
Fish/Set	1	7	1	5
Chum Salmon				
Total	483	1107	174	293
Fish/Set	6	17	2	3

Table 5. Mean Length (L), Standard Deviation (S) and Sample Size (N)[a] for Salmon Caught in Test Fishery 1987.

	Multifilament			Center-Core			Six-Strand			Single-Strand		
	N	L	S	N	L	S	N	L	S	N	L	S
Taku Inlet												
Sockeye Salmon												
Male	154	594	41.9	183	594	39.2	201	598	40.0	209	594	40.5
Female	141	589	21.5	163	586	22.5	72	588	23.9	196	589	22.8
Pink Salmon												
Male	421	485	27.6	577	486	27.3	624	483	27.2	871	480	44.0
Female	278	492	18.7	304	494	19.3	328	491	22.7	532	490	20.1
Coho Salmon												
Male	56	664	40.5	65	669	44.3	71	660	36.1	83	656	46.7
Female	42	646	35.0	39	647	35.1	45	648	33.6	61	646	26.5
Chum Salmon												
Male	135	656	37.9	116	655	38.6	145	655	39.0	158	654	35.6
Female	107	646	27.7	98	647	27.3	155	648	33.3	173	646	28.9
Sumner Strait												
Sockeye Salmon												
Male	84	592	43.2	110	587	40.4	93	589	44.2	98	595	37.6
Female	97	591	24.4	116	585	30.1	128	591	22.7	148	587	30.3
Pink Salmon												
Male	125	521	31.9	244	525	28.1	187	518	30.5	36.7	517	28.6
Female	110	524	23.5	163	525	25.2	150	522	21.6	326	519	20.2
Coho Salmon												
Male	39	637	39.9	66	630	37.0	54	633	39.5	99	634	38.9
Female	31	639	34.3	45	634	32.0	69	636	24.9	75	636	33.5
Chum Salmon												
Male	18	646	28.0	36	637	38.4	28	647	34.5	51	642	28.3
Female	20	642	35.4	37	630	31.6	47	625	30.4	56	631	29.7

[a] Sample size (N) is not equal to total catch of pink salmon.

Table 6. Comparison of Mean Length (mm) of Salmon in 1987 Test Fishery.[a)]

	Taku Inlet		Sumner Strait	
	Male	Female	Male	Female
Sockeye Salmon				
Week	p = .146	p = .215	p = .405	p = .437
Panel	p = .163	p = .417	p = .773	p = .759
Entanglement	p < .001	p = .002	p = .002	p < .001
Pink Salmon[b]				
Week	p < .001	p = .015	p = .308	p = .003
Panel	p = .067	p = .145	p = .264	p = .598
Coho Salmon				
Week	p = .421	p = .095	p < .001	p = .711
Panel	p = .640	p = .263	p = .481	p = .546
Entanglement	p = .002	p = .010	p = .051	p = .018
Chum Salmon				
Week	p = .807	p = .115	p = .506	p = .015
Panel	p = .996	p = .970	p = .449	p = .216
Entanglement	p < .001	p < .001	p = .021	p = .082

a P is the significant probability. P-values of less than 0.05 were considered significant.

b 80-90% of pink salmon were wedged in nets. Analysis of mean length included only wedged fish as very small numbers were tangled or gilled.

Table 7. 95% Confidence Interval of Mean Lengths by Week.

	Taku Inlet	Sumner Strait
	Male Pink Salmon	Female Pink
Week 1	483.1 - 486.7	523.5 - 528.7
2	476.8 - 480.6	516.7 - 523.9
3	480.8 - 485.6	518.7 - 525.5
4	477.9 - 484.5	513.9 - 520.9
Mean	481.9 - 484.1	520.2 - 523.4

	Sumner Strait	Taku Inlet
	Male Coho	Chum Female
Week 1	614.3 - 631.9	627.8 - 642.2
2	626.9 - 640.1	638.7 - 651.7
3	637.0 - 657.8	647.9 - 657.7
4		644.2 - 651.6
Mean	628.5 - 648.1	644.1 - 649.3

Table 8. Percent Caught by Each Entanglement Mode by Species and Sex in Test Fishery 1987.

	Taku Inlet			Sumner Strait		
	Tangled	Gilled	Wedged	Tangled	Gilled	Wedged
Sockeye Salmon						
Male	14.1	63.3	22.6	3.6	63.4	33.0
Female	3.4	53.6	43.0	1.6	48.9	49.5
Pink Salmon						
Male	4.6	8.8	86.6	1.4	16.4	82.2
Female	1.3	2.2	96.5	0.5	6.3	93.2
Coho Salmon						
Male	31.6	45.4	22.9	5.4	37.6	57.0
Female	15.0	43.3	41.7	1.4	29.1	69.5
Chum Salmon						
Male	24.4	53.8	21.8	2.3	54.1	43.6
Female	1.7	25.9	72.4	0	30.6	69.4

Table 9. Comparison of Mode of Entanglement Between Mesh Types in Test Fishery 1987.[a)]

	Taku Inlet	Sumner Strait
Sockeye Salmon		
Males	p = .162	p = .062
Females	p = .033	p < .0001
Pink Salmon		
Males	p = .036	p = .905
Females	p = .062	p = .074
Coho Salmon		
Males	p = .740	p = .290
Females	p = .150	p = .190
Chum Salmon		
Males	p = .460	p = .250
Females	p = .130	p = .009

a) P is the significance probability and a value of less than 0.05 is considered significant.

Table 10. Mean Catch Per Hour Fished (CPUE) for Summer Test Fishery 1987.

	Number Sets	Multi-filament		Center-Core		Six-Strand		Single-Strand	
		Sockeye	Pinks	Sockeye	Pinks	Sockeye	Pinks	Sockeye	Pinks
Taku Inlet									
Week 1									
Day	19	1.16	6.95	1.10	8.92	0.85	9.13	1.43	13.09
Night	3	0.34	2.10	0.23	2.31	0.48	2.79	0	3.73
Week 2									
Day	5	8.69	9.30	9.65	10.72	11.34	15.19	8.50	26.55
Night	3	6.16	2.67	10.46	3.62	5.31	16.70	6.02	23.14
Week 3									
Day	19	2.33	6.80	2.34	8.22	3.98	11.03	3.37	16.52
Night	4	0.49	2.30	0.56	3.52	0.92	2.47	0.87	3.64
Week 4									
Day	20	1.50	5.49	2.11	3.25	3.50	5.80	1.44	7.11
Night	1	0	0	0	0	0	3.03	0	2.5
Total	74	1.70	5.78	1.89	6.00	2.57	8.00	2.04	11.14
Sumner Strait									
Week 1									
Day	18	0.88	3.11	1.62	5.55	1.70	3.50	2.42	7.49
Night	1	4.13	11.57	10.64	42.81	0	10.13	2.02	30.30
Week 2									
Day	16	0.80	1.41	2.01	2.06	1.66	2.82	2.10	2.13
Night	9	0.87	1.05	1.07	1.30	1.70	1.76	0.77	2.68
Week 3									
Day	20	2.54	1.46	2.26	1.84	2.08	3.06	1.82	4.43
Night	3	1.84	3.46	4.26	0.93	1.57	1.19	1.53	1.06
Week 4									
Day	14	1.93	1.54	1.26	3.65	2.02	3.60	3.36	10.79
Night	11	0.40	0.61	0.79	0.72	0.86	1.10	0.40	0.82
Total	92	1.26	1.64	1.67	2.43	1.66	2.49	1.60	4.05

Table 11. Mean Catch Per Hour Fished for Fall Test Fishery 1987.

	Number Sets	Multifilament		Center-Core		Six-Strand		Single Strand	
		Coho	Chum	Coho	Chum	Coho	Chum	Coho	Chum
Taku Inlet									
Week 1	17	0.26	1.00	0.27	1.18	0.26	1.42	0.27	1.02
2	17	1.02	1.10	1.08	0.85	1.61	1.11	1.76	1.39
3	19	1.06	1.61	0.73	1.77	0.90	2.36	1.09	2.72
4	13	1.18	5.53	1.51	3.36	1.65	5.46	1.77	5.65
Total	66	0.81	1.77	0.79	1.54	0.97	2.08	1.08	2.13
Sumner Strait									
Week 1	24	0.66	0.35	0.95	0.58	1.07	0.59	1.41	1.14
2	48	0.43	0.37	0.99	0.48	0.83	0.52	1.28	0.63
3	24	0.47	0.16	0.67	0.67	0.97	0.36	0.91	0.81
Total	96	0.48	0.30	0.87	0.53	0.89	0.48	1.21	0.76

Table 12. Significance of Tests Comparing CPUE Between Mesh Types for 1987 Test Fishery.[a]

	Taku Inlet			Sumner Strait
	Male	Female	All	All[b]
Sockeye Salmon				
Week	$p < .001$	$p < .001$	$p < .001$	$p = .007$
Period	$p = .002$	$p = .035$	$p = .006$	$p = .742$
Mesh Type	$p = .233$	$p = .126$	$p = .076$	$p = .365$
Pink Salmon[c]				
Week			$p = .009$	$p = .003$
Period			$p = .223$	$p = .699$
Mesh Type			$p = .002$	$p = .090$
Coho Salmon				
Week	$p < .001$	$p < .001$	$p < .001$	$p = .715$
Mesh Type	$p = .070$	$p = .394$	$p = .105$	$p = .005$
Chum Salmon				
Week	$p < .001$	$p < .001$	$p < .001$	$p = .788$
Mesh Type	$p = .189$	$p = .039$	$p = .099$	$p = .018$

[a] P is the significance probability where a p-value of less than 0.05 was considered significant.

[b] Sexes were combined for Sumner Strait data.

[c] Pink salmon were not all sexed, and cannot be separated.

Table 13. Pairwise Comparisons of Mesh Types for Experiments With Significant ANOVA Results.

Location	Species	ANOVA p-value	Significant Panel Comparisons
Taku Inlet	Pink Salmon	.002	Single-Strand vs. Outer Core
			" vs. Multifilament
	Chum Female	.039	None
Sumner Strait	Coho Salmon	.005	Single-Strand vs. Multifilament
	Chum Salmon	.018	Single-Strand vs. Multifilament

Table 14. Relative Efficiency of Mesh Types as Estimated by Ratios of CPUE for Test Fisheries 1987.[a)]

	Center Core/ Multifilament			Six-Strand/ Multifilament			Single-Strand Multifilament			Six-Strand Center Core		
	Mn	St. Err	CV	Mn	St. Err	CV	Mn	St. Err	CV	Mn	St. Err	CV
Summer												
Taku Inlet												
Sockeye	1.01	.09	25.3	1.42	.25	50.7	1.18	.13	31.1	1.39	.15	29.7
Pinks	1.26	.24	54.4	1.58	.20	35.7	2.19	.47	60.0	1.36	.12	25.0
Sumner Strait												
Sockeye	1.63	.33	57.9	1.78	.46	72.3	1.65	.33	56.6	1.08	.12	30.7
Pinks	1.83	.28	43.5	1.61	.21	36.8	2.96	.50	48.1	1.02	.21	56.8
Fall												
Taku Inlet												
Coho	1.33	.30	63.0	1.52	.37	68.6	1.78	.52	82.1	1.34	.36	75.2
Chum	0.98	.14	38.9	1.33	.24	50.4	1.50	.36	67.9	1.34	.07	15.4
Sumner Strait												
Coho	1.73	.35	49.8	1.92	.23	29.3	2.61	.56	52.7	1.21	.15	29.9
Chum	3.07	1.30	103.6	2.43	.60	60.0	3.76	.84	54.9	.99	.14	34.0

a Mn = Mean Ratio = $\frac{\text{CPUE Mesh Type 1}}{\text{CPUE Mesh Type 2}}$

St. Err = Standard error of mean ratio.

CV = Coefficient of variation = (standard deviation/mean)*100.

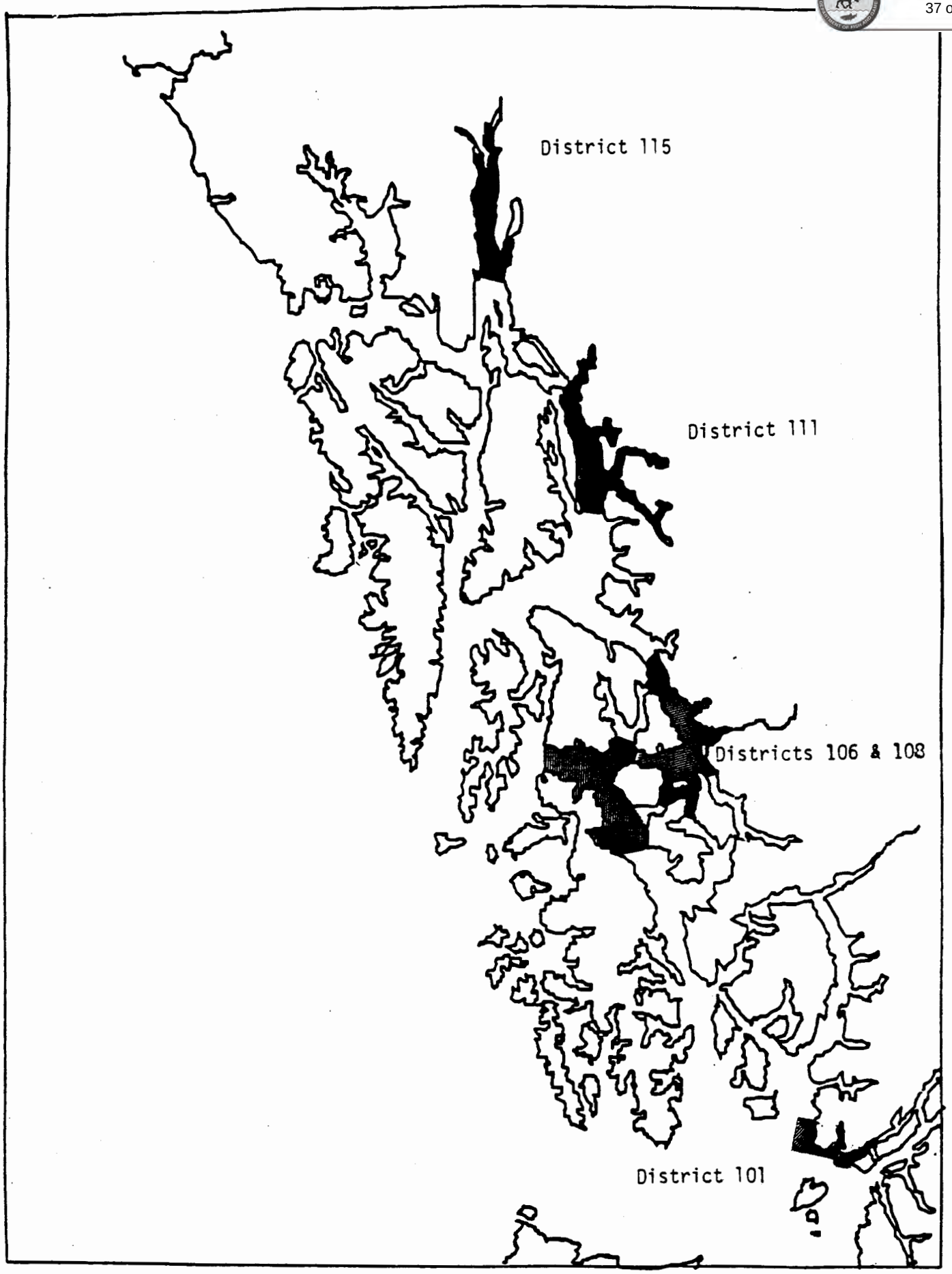

Figure 1. Southeast Alaska Drift Gillnet Fishing Areas.

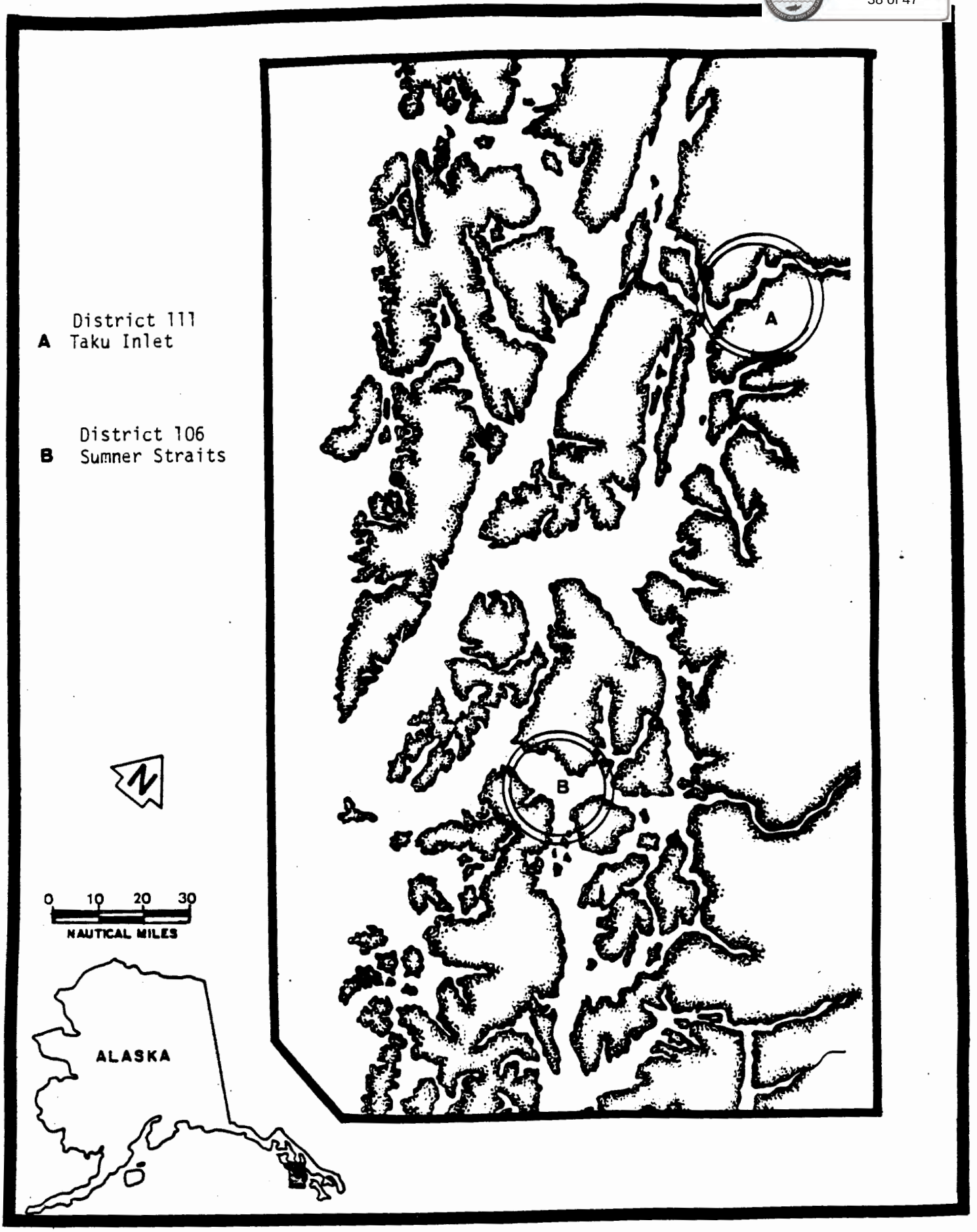

Figure 2. Gillnet Gear Evaluation Study Areas.

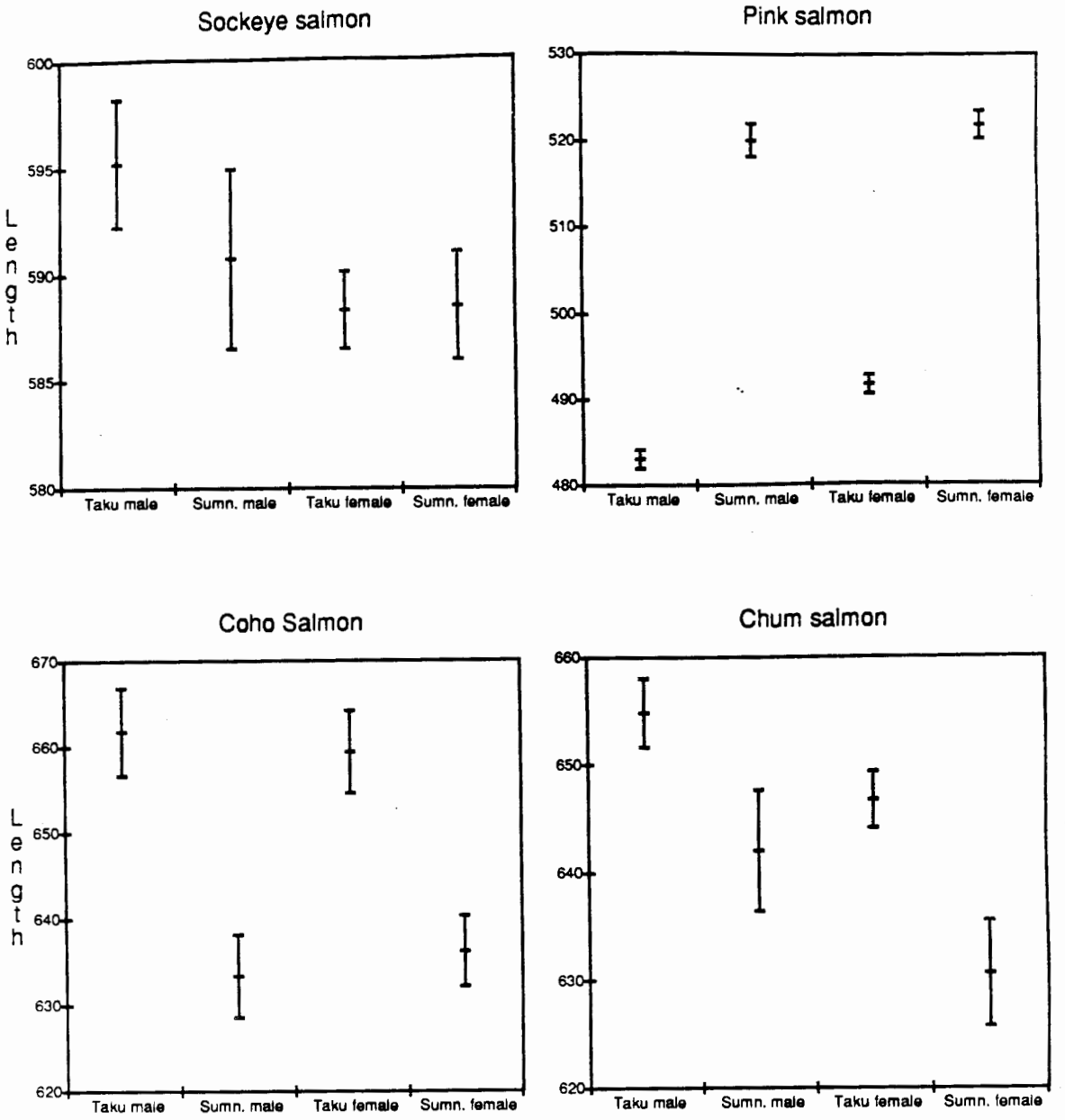

Figure 3. Average length (mm) and 95% confidence interval of salmon in 1987 test fisheries.

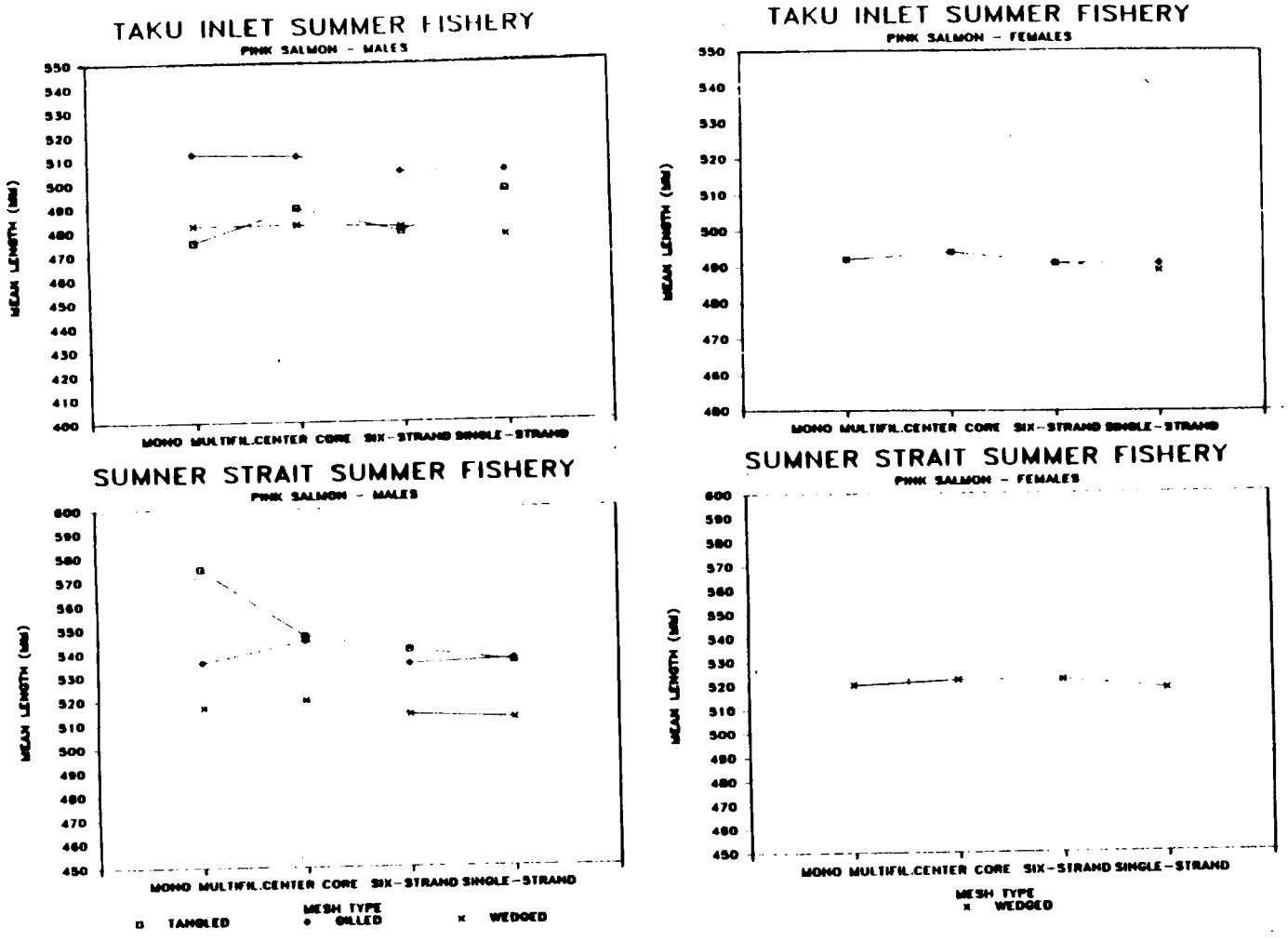

Figure 4. Average length (mm) by mesh type and entanglement mode for 1987 test fisheries.

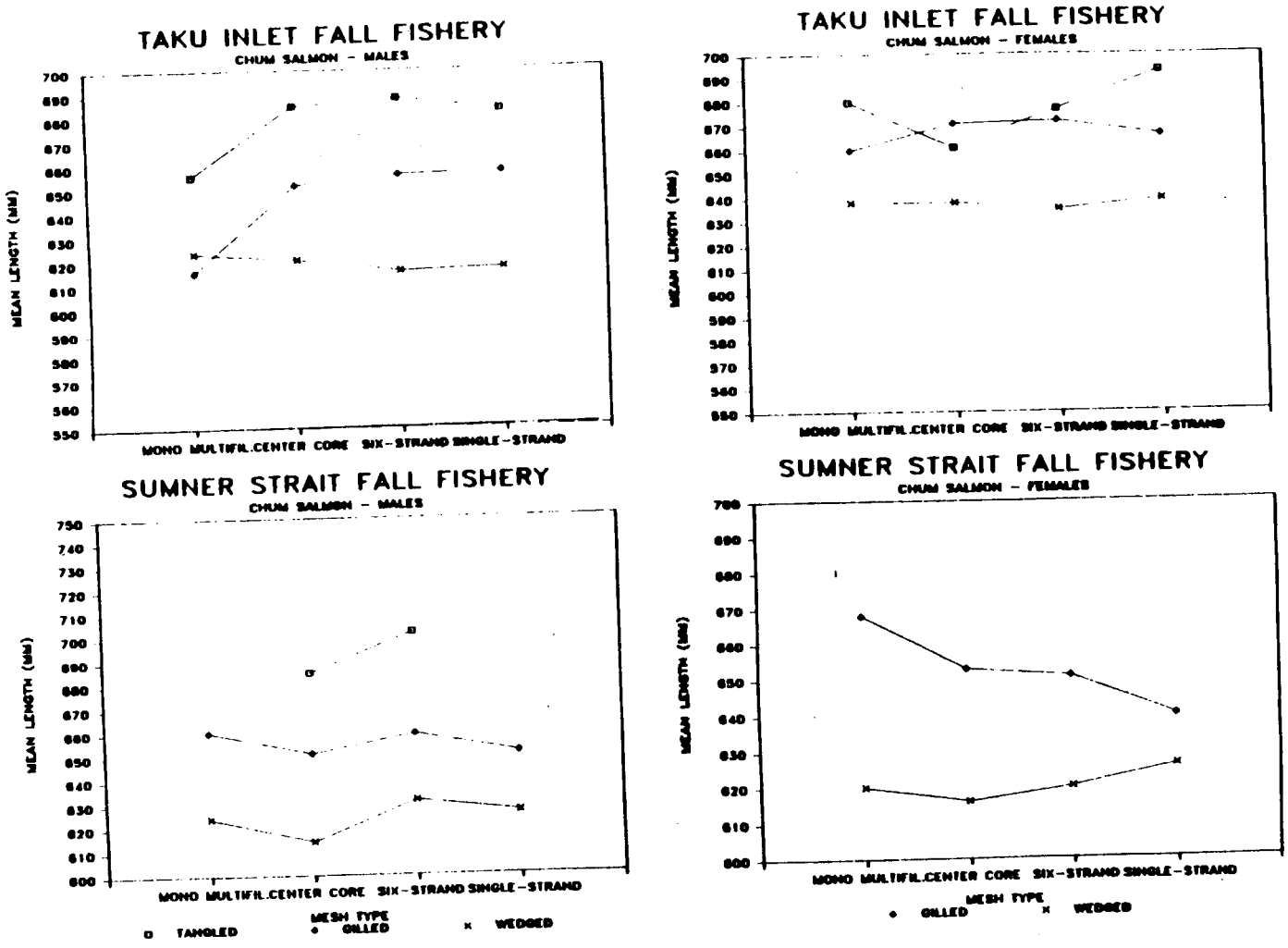

Figure 4. (page 2 of 4)

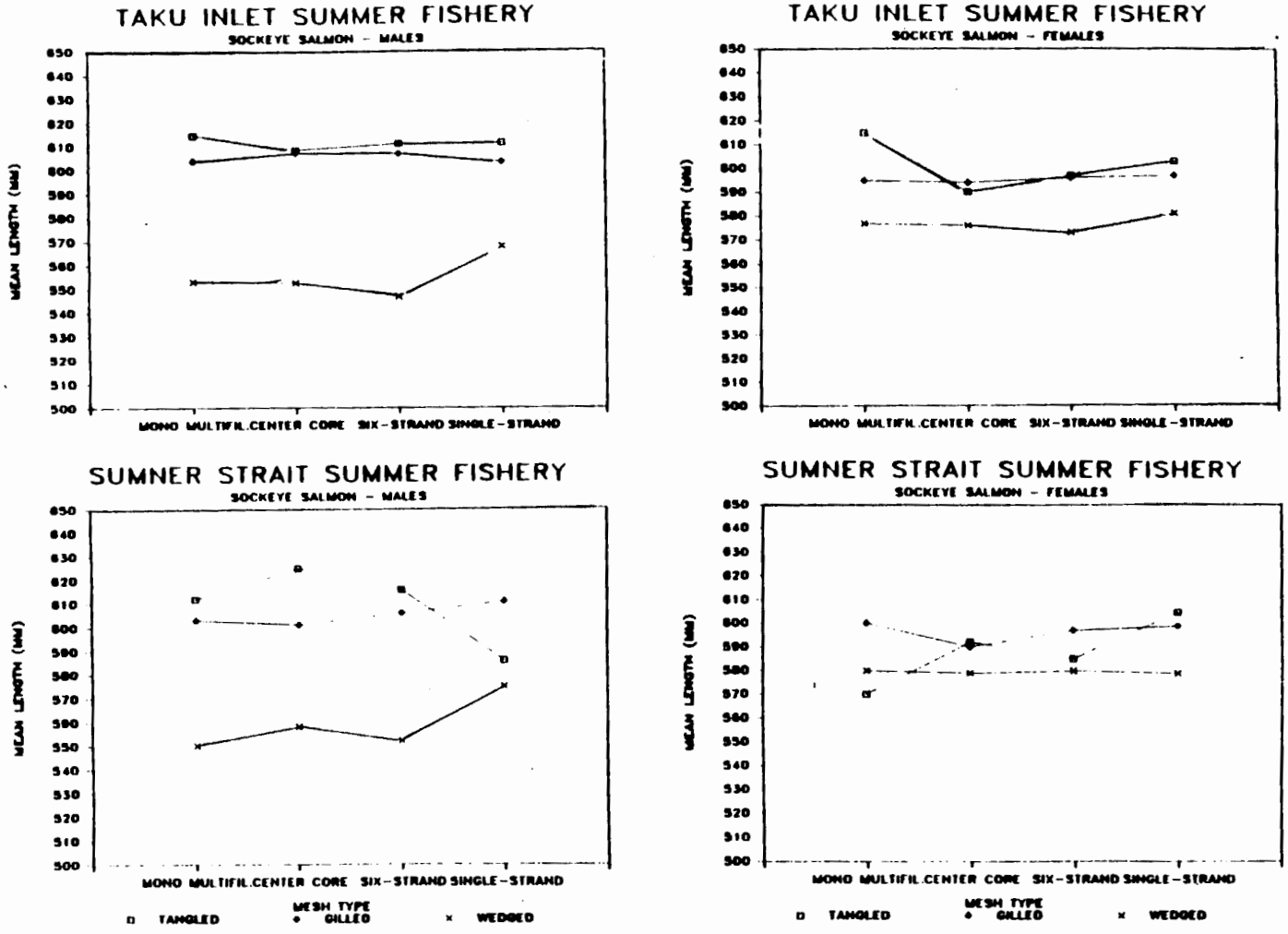

Figure 4. (page 3 of 4)

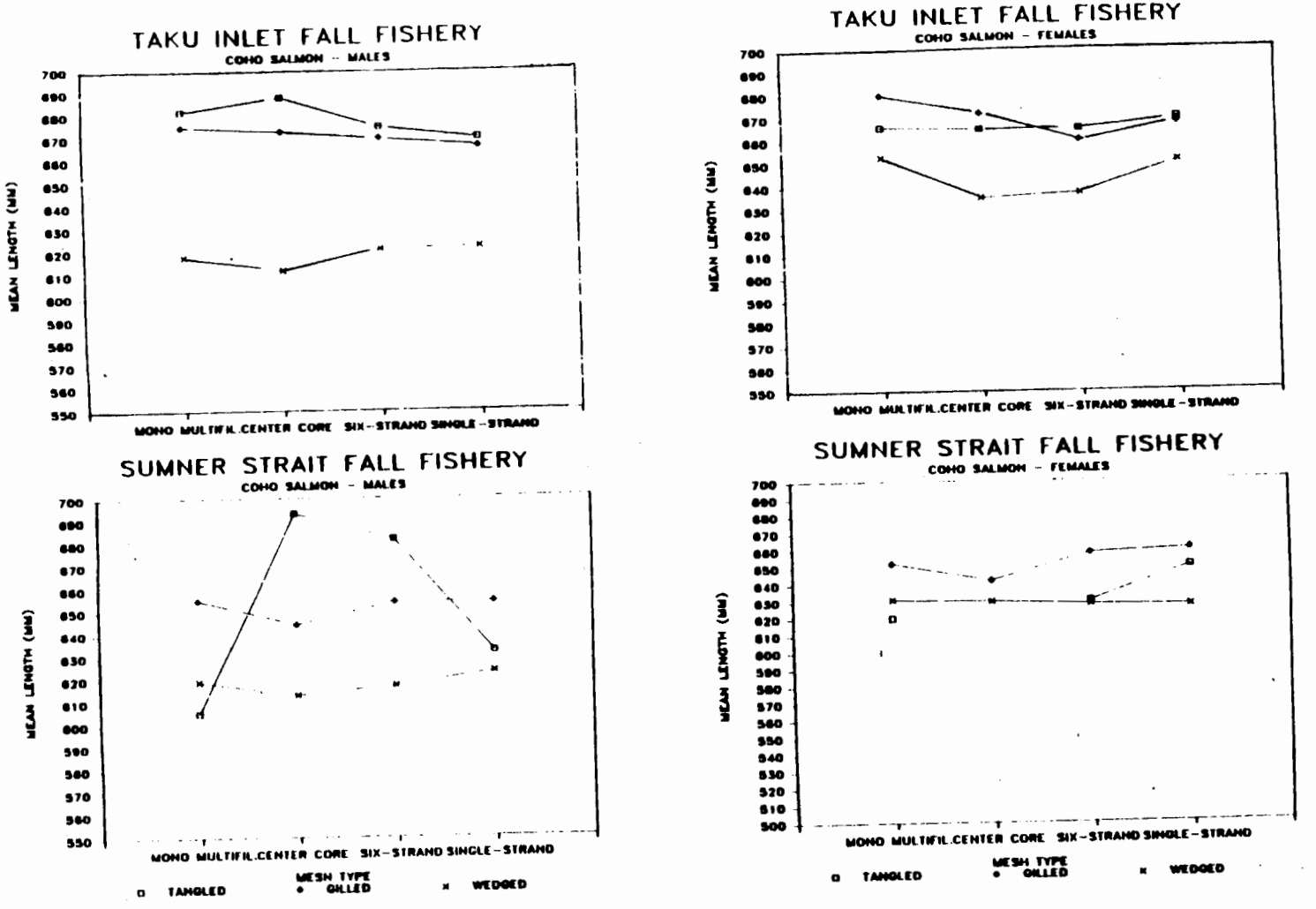

Figure 4. (page 4 of 4)

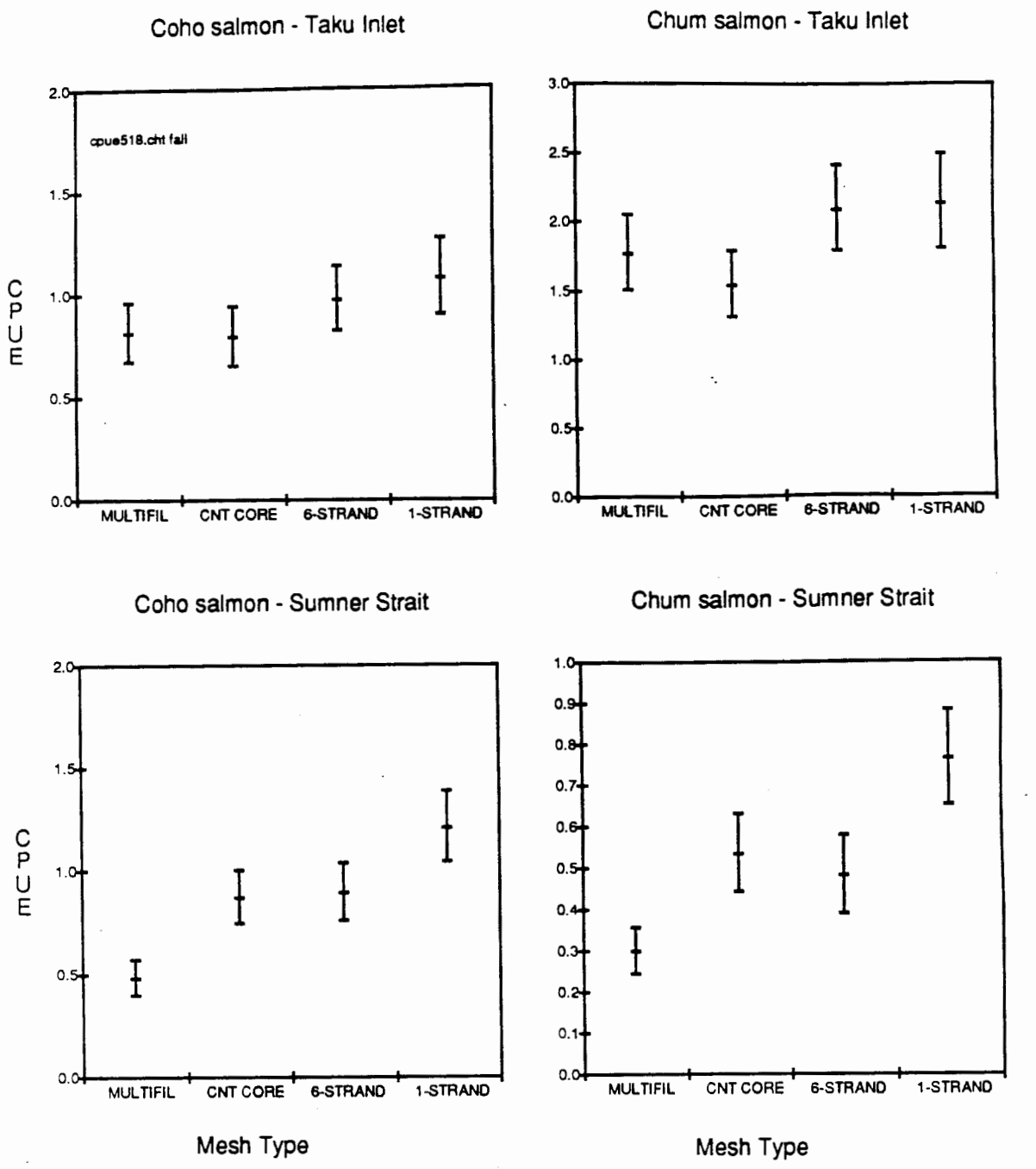

Figure 5. Catch-per-hour-fished (CPUE) and 95% confidence interval by mesh type and species in the 1987 test fisheries.

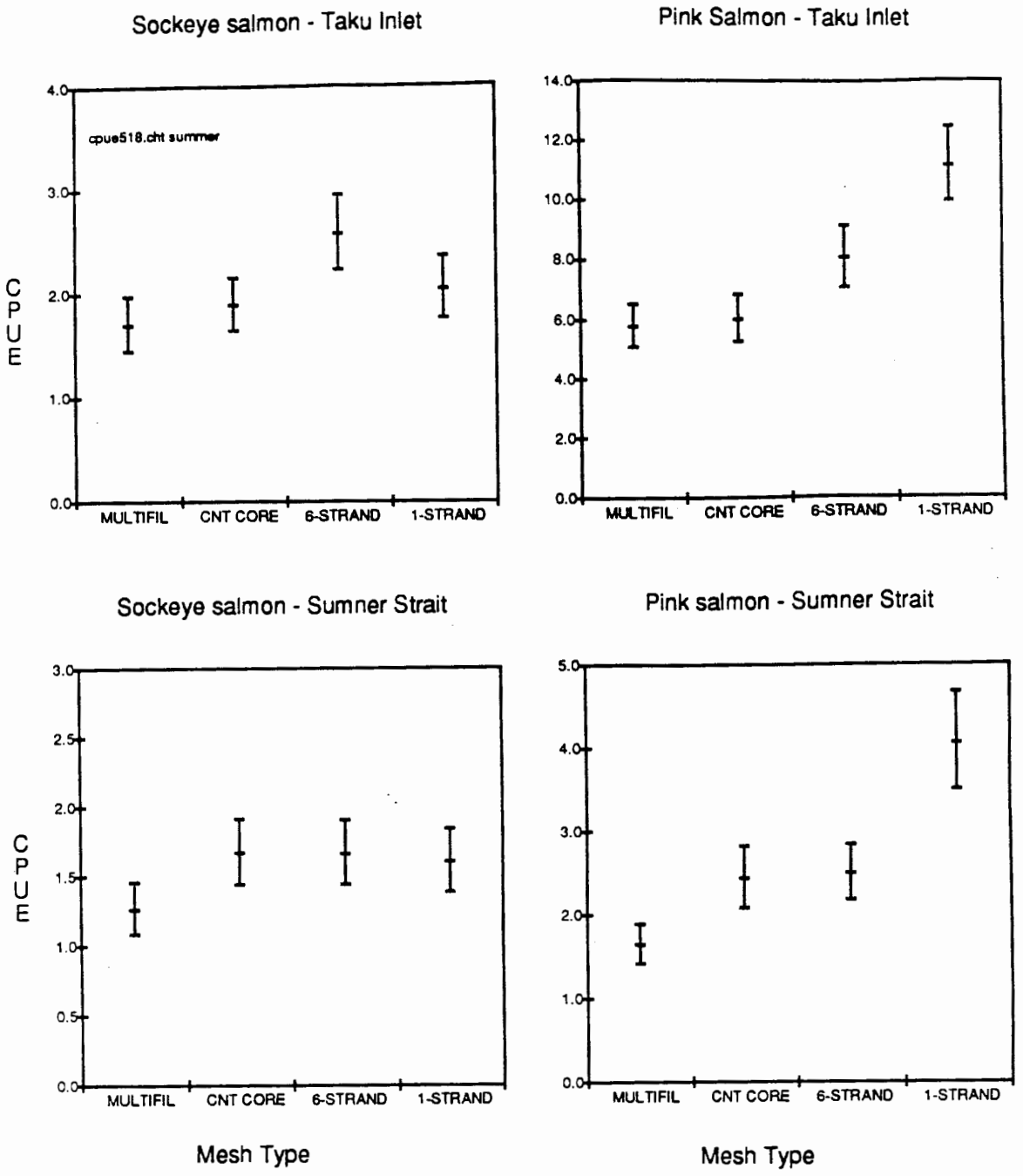

Figure 5. (page 2 of 2)

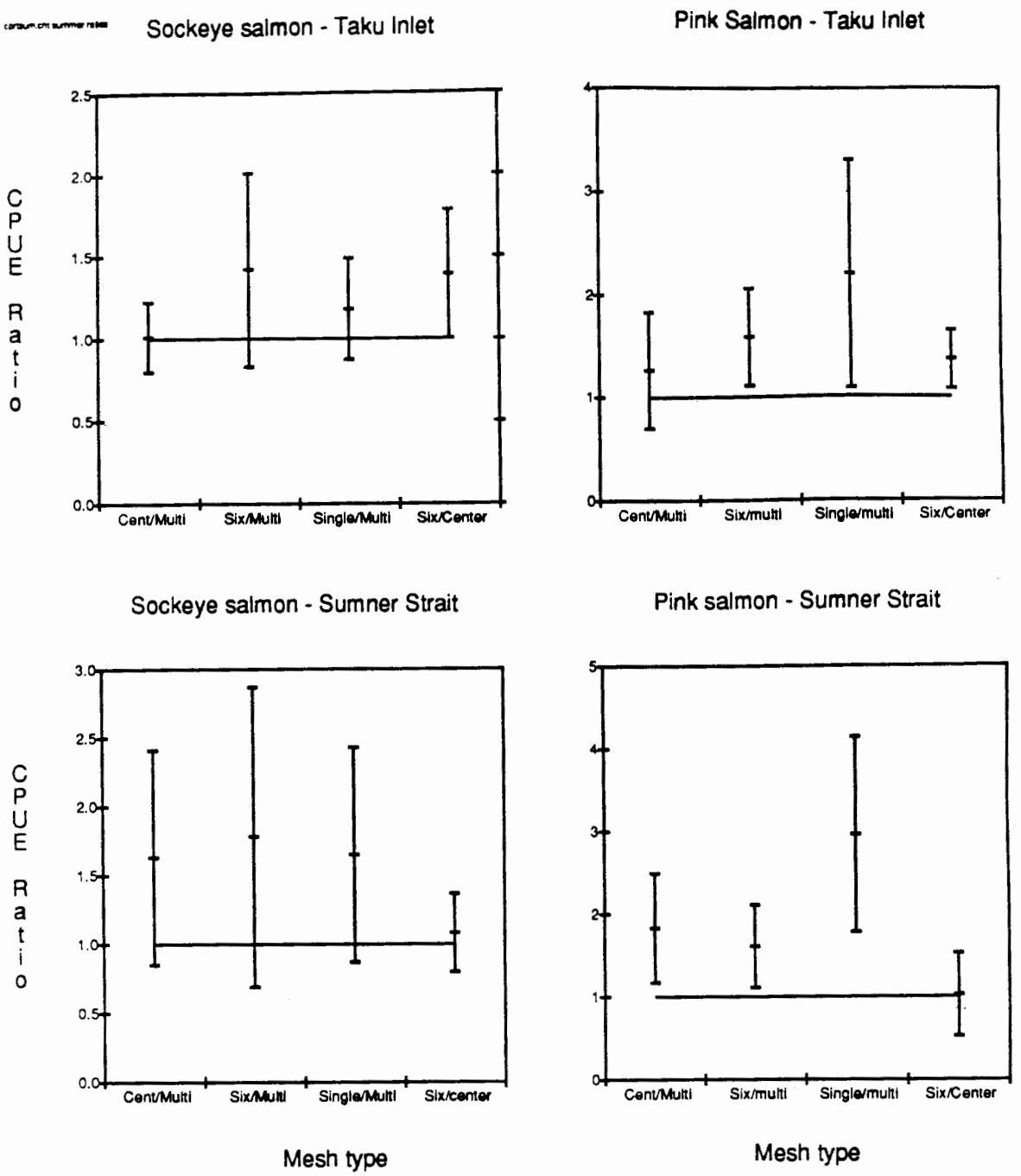

Figure 6. Ratio of CPUE and 95% confidence interval standardizing mesh types to multifilament in 1987 test fisheries.

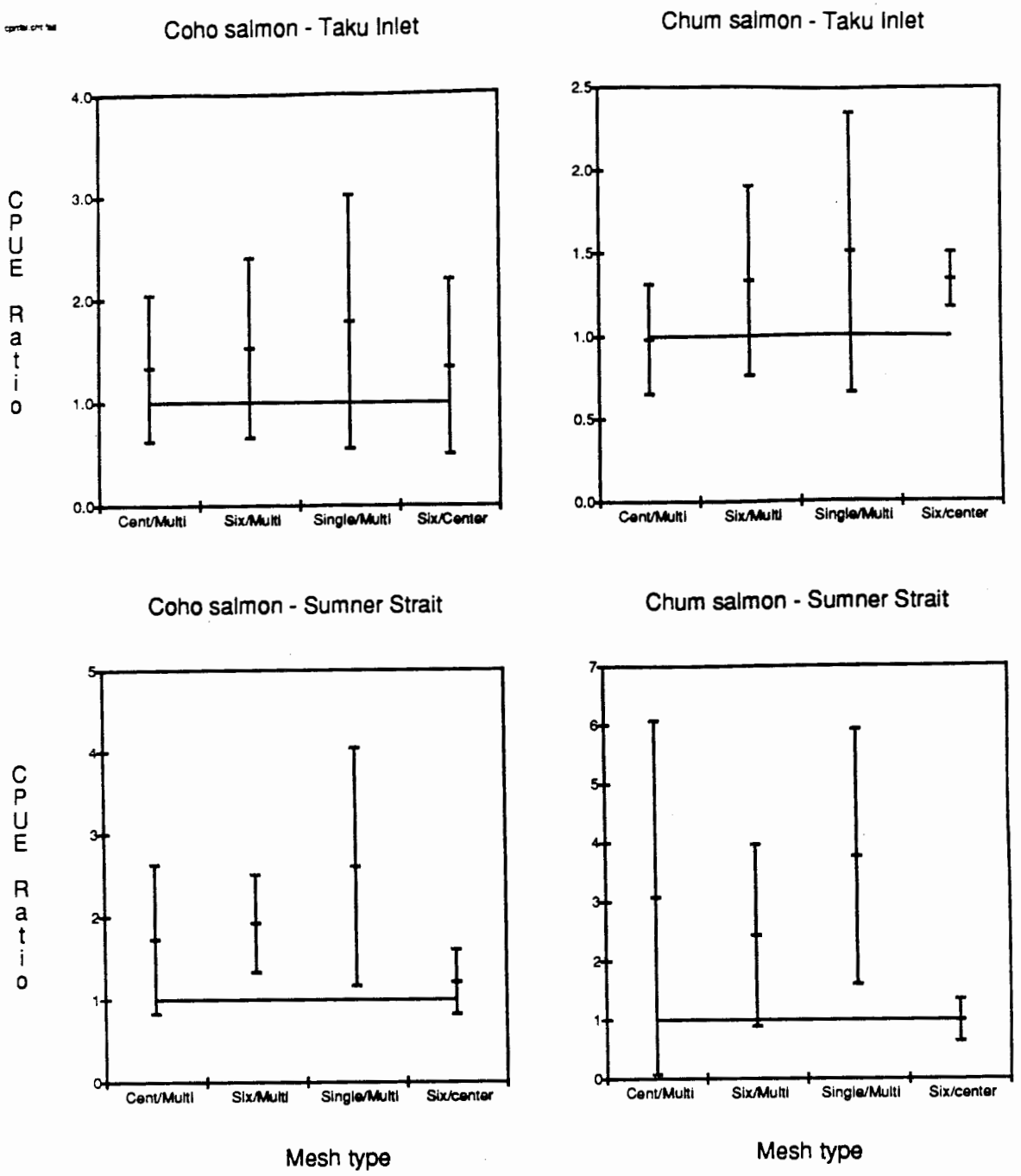

Figure 6. (page 2 of 2)

Submitted By
Lance Preston
Submited On
2/9/2015 2:18:40 PM
Affiliation
Troller

Mr. Chairman and members of the Alaska State Board of Fisheries,

Thank you for your time and your service to our fisheries. I am a salmon troller and have these few comments.

Proposal 176: In keeping with the guiding principles of the Alaska State Board of Fisheries document, "Southeastern Alaska Area Enhanced Salmon Allocation Management Plan" adopted in 1994, I am in favor of Proposal 176. This proposal will effectively redress how both NSRAA and DIPAC have consistently and by now systematically failed to honor the following numbered principles set forth in the document:

7. "The alllocation percentage goals will be used to provide a fixed target for production...It is desirable that new production , or revised existing production contribute to achieving the allocation percentage goals established."

8. "Allocation percentage goals will be long term."

13. "When adjustments are deemed necessary to the distribution of the harvest to meet allocation percentage goals, the following tools should be used: (1) special harvest area management adjustments; (2) new enhanced salmon production; and (3) modification of enhancement projects production..."

"14. "The allocative percentages will be : Seine - 44% to 49% Troll- 27% to 32% Gillnet - 24% to 29%..."

Since it is historically clear that NSRAA and DIPAC have been unwilling or unable to correct gross harvest imbalances among the gear groups, ineffectively managing special harvest areas in particular, proposal 176 will finally provide these hatcheries with an apparently needed incentive and restore the sound and fair management principles originally set forth by the Board of Fisheries.

Proposal 223: I am in support of this proposal. Since kings are generally less abundant in mid August as opposed to early July, I think that August king salmon openers allowing for the harvest of 40% will tend to last longer and therefore allow catches to be more evenly distributed among the fleet. Based on summers wherein the 2nd king opener lasted for several weeks I also observed that less kings were caught as bycatch, likely reducing mortality, and that the generally larger kings fetched a higher price.

Proposal 228: I am opposed to this proposal. The Alaska Department of Fish and Game has managed the troll fishery so carefully that coho abundance in recent years has been astoundingly healthy. I would like to refer to AFF&G's own scientific data to address any and all concerns about escapement.

Thank you again for your time and for the opportunity to provide testimony, Lance Preston

Submitted By
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2/9/2015 4:05:06 PM
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Vice Chair Kluberton and Commissioners:

Section 13 (A) of 94-18-FB states: "*The joint RPT will make appropriate recommendations through the Commissioner to facility(s) annual operating plan(s) to attain allocation goals."*

PROPOSAL176 adds oversight to a sound management plan which ultimately benefits all three gear groups. The problems leading up to a proposal like 176 have been brewing for years, they will not go away. As Commissioners you have an unique opportunity to correct this situation and make 94-148-FB complete and workable for trollers and the seine and gillnet fleet.

The Chum Troller's Association brought forward Proposal 176 because they felt they had exhausted all of their avenues to be included in developing these hatchery association plans. Their frustration is genuine. have observed instances where it is obvious that side agreements had been made prior to board meetings and 've seen parliamentary procedure used as a "tactic." t's obvious, even to someone without a lifetime in fishing.

The problem, however, is not "fish politics," which is as ubiquitous as salt in seawater.

The problem is currently there is NO mechanism to ensure that 94-148-FB is working as intended. Annual reports are generated by ADF&G but there is no follow-up action. The tools for correcting allocation imbalances are contained in 94-148-FB but are not used.

No hatchery association (possibly excepting SSRAA) has specific practices in place to help the gear group behind in their allocation. listened to one hatchery professional, when pressed at a recent meeting to describe his plan for getting trollers to their allocation state that "the plan was opportunity." That's a little vague for a science-based industry.

f was a Commissioner faced with the Solomon-like decision of what to do with 94-148-FB and gear groups that are behind in allocation?

I WOULD APPROVE PROPOSAL 176 AND AMMEND IT TO INCLUDE:

(1) a requirement that ALL hatchery associations establish their own *"plan of action"* within their Annual Operating Plan submitted to the RPT/Commissioner that details what policies and practices they will implement to help the gear group(s) lowest in allocation (in their area) into range.

(2) a mechanism to measure the outcomes (and success) of each hatchery association's *"plan of action."* Hatchery associations, the RPT/Commissioner would use this data to track the success of each association's efforts and modify their Annual Operating Plans accordingly for the next season.

trust the Board's wisdom to recognize that 94-148-FB is a wise and workable document, still applicable to today's fisheries. As such, it is our best means of helping any gear group(s) behind in allocation to come into range.

The argument that this concept is not "workable" does not hold up any better than it did for seat belts almost 50 years ago t is workable because the Board of Fish has the power to amend its own decisions. Our biologists and staff at ADF&G are first-rate. They have the science, the skill and are already generating reports. Our hatchery managers and staff are talented, innovative and they care about this industry. There is no logical reason this cannot be accomplished.

wish you well. t is a difficult decision.

Mary Ann Peterson

Fisherman's Wife

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2/9/2015 4:18:41 PM
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Vice Chair Kluberton and Commissioners:

I OPPOSE PROPOSAL 175

The Board of Fish 94-148-FB is a wise and workable document. It represents hard work and consensus building by an often fractious industry.

All that is lacking in those Findings is an actual mechanism to monitor and ensure that

hatchery associations develop plans that reflect the Board of Fish direction in 94-148-FB.

There is NO problem or issue with the allocation distribution as established that Proposal 175 would address or improve.

Alaskans pride themselves on having one of the world's most sustainable fisheries. We got there using science, reason and cooperation. Let's not muck up something that is working.

Sincerely,

Mary Ann Peterson

Fisherman's Wife

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2/9/2015 4:49:16 PM
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Vice Chair Klubertson and Commissioners

I SUPORT SUPPORT PROPOSAL 229

I support the establishment of a cooridor between HomeShore (14c) and Admiralty shore. This would allow trollers to troll to their way to Swanson Harbor which is our most protected harbor in the area.

Currently we have to pull our gear and then run for an hour just to drop our gear all over again to start fishing. You try doing that and get dinner!

Opening this area would spread the fleet, which is important. It would reduce running time and congestion at the tenders. If boats are delivering to tenders at "the log dump" (HomeShore) and choose to anchor at Swanson that night - it's a two hour run. In an area that can quickly blow up 50-60kt winds, it becomes a safety issue getting to Swanson for the night.

I realize that the Department may have some concerns about opening this area to trolling because it increases the overall size of the fishing zone and I definitely appreciate that.

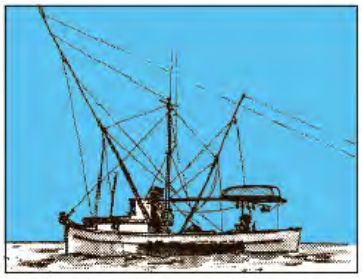
If the Commission is unable to approval Proposal 229 this BoF cycle, perhaps this area could be opened as an "experimental fishery." which would give the Department an opportunity to collect and study the data so that a science-based decision can be made.

Thank you all for providing this forum for our comments.

Sincerely,

Mary Ann Peterson

Fisherman's Wife



Alaska
Trollers
Association

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Board of Fisheries Positions
February 2015

113 Prohibit all fishing around Cache Island for bottomfish, crab, and shrimp. OPPOSE

The proposer has suggested a 300' no fishing zone around Cache Island, but provides insufficient justification. Emphasis is placed on relieving stress from overfishing and the 'cornucopia' effect they anticipate will occur by closing local fisheries. ADFG points to healthy resources in the face of stable fishing effort and low level harvests. Commercial longliners and trollers utilizing the area to harvest halibut and salmon incidentally catch miniscule numbers of groundfish in the stat areas that include Cache Island, with trollers landing an average of $251 worth of product over the last 5 years. So what's the point? And why 300' feet? ATA opposes arbitrary imposition of marine sanctuaries. 'No Fish' zones may well have a place in a management strategy, but should be developed to serve a specific purpose, be grounded in solid data, and include well thought out goals and objectives. This is particularly true in a region that is so reliant on ample fishing opportunity for a wide range of user groups. This proposal would provide few, if any, added benefits for the resource, would reduce fishing options, and complicate management and enforcement in a time of tightened budgets. Cache Island is not in need of sanctuary status.

139 Define mechanical jig separate from dinglebar troll and establish hook limit. SUPPORT

ATA supports clarifying the difference between jigging and dinglebar gear, but suggests some work with the user groups on language. Concern has been expressed about literal interpretation of such terms as, “oriented vertically”; and, “may not be pulled through the water or deployed while the vessel is underway”. The nature of operating a fishing vessel on a dynamic ocean means that, at times, you have to be moving forward just to be going nowhere, so the language needs to allow for times the boat might be in gear and the lines may not be totally still or vertical. Unfortunately, there have already been enforcement problems due to the verbiage of these particular regulations, so fishermen have cause to fear literal interpretations. Affected fishermen, ADFG, and enforcement can surely put heads together to come up with clear language to achieve the intent of these definitions.

140 Increase commercial lingcod size limit to 30". OPPOSE

The sponsor claims there will be positive impacts on lingcod recruitment from increasing the size limit to 30", but this appears to be based on supposition, not data. Additionally, there is no justification given as to the selection of the dorsal fin/tip of tail measurement. Based on fleetwide experience and ADFG statements, lingcod stocks in Southeast are abundant and conservatively managed. Increasing the size limit does not appear

to offer benefits for the resource, could reduce the commercial harvest, and is likely to shift effort away from male fish onto larger, more fecund females. That could ultimately harm the lingcod resource and all user groups.

41 Allow trollers fishing Sitka Sound up to 2 lingcod per troll trip. SUPPORT

Trollers fishing in and near the Sitka Local Area Management Plan (LAMP) area can't retain lingcod. Trolling for coho and chum often means crossing LAMP boundary lines, which is complicated by requirements to offload any lingcod caught in other areas prior to fishing inside the LAMP. Lingcod harvested in the LAMP used to be counted against the Central Southeast Outside (CSEO) lingcod quota; much of that quota now goes unharvested. The troller's lingcod quota shortfall is largely due to LAMP management. Lingcod was allocated amongst the users prior to the LAMP being established. The LAMP management plan subsequently denied trollers access to lingcod incidentally caught in this traditional area, thus reducing their ability to catch the CSEO quota. It seems reasonable to allow trollers to retain a couple of fish for personal use and count that harvest against the CSEO quota. Reporting the catch would not be burdensome for fishermen or ADFG, because both commercial and personal use harvest are already supposed to be reported on fish tickets and there is a system in place.

157 Reduce the king salmon size limit to 26". OPPOSE

ATA opposes changes in the size limit for Chinook salmon, due to likely increases in sport catches, which could lead to more sportfish restrictions and potential allocative disputes between the fleets, particularly in years of low abundance. And, Alaska's Pacific Salmon Treaty commitments to maintain standardized fishing regimes. Early in the treaty process, British Columbia decided to increase its size limit, in part to derive more value for their fleets' quota harvest of king salmon. This created immense tension between the parties. In 1999, both countries committed to maintain standardized fishing regimes, to the extent practicable, in order to implement an abundance based system for Chinook. The current size limit is a factor in some stock assessments, which makes data consistency an important consideration. Trollers can certainly appreciate the frustrating fact that king salmon are smaller in recent years, but we still support maintaining the current size limits for the reasons stated.

159 Saltwater: Nonresident annual limit of coho, sockeye, pink and chum salmon is 3 times the daily bag limit; no limit for residents. SUPPORT

ATA supports the intent of this proposal and has long asked for meaningful and enforceable possession limits of some reasonable amount. The reason ATA supports annual limits for non-residents is to head off conflicts between user groups, particularly in times of shortage. Resources are fully allocated in our region and it seems important not to build unreasonable expectations for any user group, particularly one that remains unlimited. We don't think it's appropriate to set limits on resident harvest beyond normal bag and possession limits. Non-resident annual limits exist for Chinook salmon and could be used for coho, at minimum. Utilizing existing tools to report this information to ADFG could hopefully assist in more timely and accurate enumeration of yearly harvest, which is not finalized for quite some time. Other states and countries have implemented such systems

to control the volume of fish nonresident can remove from their areas. Given Alaska's commitment to sustainability, and laws governing the sale of sport caught fish and wanton waste, it's puzzling that the Board of Fish and ADFG have been reluctant to consider utilizing annual limits until there is a conservation need or allocation battle. The Chinook annual limit seems to work well and is apparently thought to be enforceable. Our members believe that most people abide by possession limits, but have also witnessed abuses here in Southeast and on important rivers like the Chilkat and Russian. Much of that stems from the 'processed' loophole, whereby processed fish don't count against the possession limit. Annual limits, based on all forms of sport caught fish held in possession back to place of residence, could discourage people from taking large quantities of fish from the state. What the appropriate limit would be warrants a discussion, and certainly the variability of annual abundance could allow flexibility, as it does for king salmon.

160 Freshwater Nonresident annual limit of coho, sockeye, pink and chum salmon is 3 times the daily bag limit; no limit for residents. SUPPORT

See Proposal 159 comments, with proviso that it's unclear if the proposers intend this to be in combination with saltwater catch, or separate. Combined annual limit for fresh and saltwater would seem easiest to enforce. Some areas have seen increased pressure in freshwater by the guided industry.

167 Open freshwaters along the Juneau road system to sportfishing for hatchery kings; includes use of bait in Fish Creek Pond and snagging. SUPPORT

ATA supports this proposal, which will allow Juneau-Douglas anglers to catch king salmon from the local hatchery that stray into local streams. In addition to their longstanding king salmon program, Douglas Island Pink and Chum (DIPAC) was the recent recipient of Chinook Salmon Mitigation monies, to provide additional king salmon for both anglers and trollers. There are several king salmon release sites in the Juneau area and ADFG has been liberalizing the sport fishery to take advantage of these fish and remove them from local creeks. While ATA opposes sport fisheries in Southeast rivers that support king salmon, that is not the case here - there are no wild king salmon stocks in these waters. It is important to catch hatchery kings for a variety of reasons, including the opportunity help mitigate losses incurred by all fishermen under the Pacific Salmon Treaty. The fact that ADFG intends to remove the size limit on these fish will provide an added bonus for the maker of proposal 157. Most of Alaska's hatchery fish do not count against the quota, so there should be no conflict between commercial fishermen and anglers. This seems like a great opportunity for the Juneau marine sportfishery.

168 Open freshwaters along the Juneau road system to sportfishing for hatchery kings; includes snagging. SUPPORT

See Proposal 167 comments.

174 Establish Taku River Management Plan **OPPOSE**

Beginning in 1963, restrictions were imposed on both sport and commercial fisheries to conserve Southeast Chinook stocks. Sport fishing for king salmon in Southeast rivers was restricted; directed troll and gillnet fisheries on the Taku and Stikine Rivers were closed; and any fishery with an incidental take of king salmon was restricted. After 40 years of sacrifices, sport fisheries were liberalized and in 2005, commercial fishing was re-opened for both Alaska and Canadian fishermen. Today, conservative management, including a freshwater prohibition, provides for Chinook fisheries in marine waters.

The Taku River is one of the most studied salmon systems in the world and fish from its waters are subject to an international treaty agreement and a dynamic state management program. Taku River Chinook are a resource shared by Alaska and Canada. Adults transit Alaska waters and most spawn in the Canadian portion of the river. The Pacific Salmon Commission (PSC) implements sharing agreements between the US and Canada, which only allow a directed Chinook fishery if escapement needs and allocative criteria are met. Since its inception in 2005, the directed Taku River fishery has been opened only three years - 2005, 2006, and 2009. That's not because these Chinook stocks are ailing, but simply that there hasn't been enough surplus beyond escapement needs to open a directed fishery.

Chinook salmon productivity is known to fluctuate and is currently on the low end statewide. For the Taku, this is widely thought to be the result of ocean conditions, not harvest. According to the Joint Chinook Technical Committee of the Pacific Salmon Commission, the fleets exploitation rate on the Taku stock have been low, averaging just 20% since 1999 (PSC Joint Chinook Technical Committee Annual Report of Catch and Escapement for 2013, Report TTCCHINOOK (14)-2, p.103).

Proposers suggest shutting down spring troll fisheries when Taku kings are expected to meet the point goal - why would any fishery be shut down for 'conservation' if stocks are achieving MSY? ADFG managers put escapement first, as they should, and they achieve the MSY goal nearly every year. The Biological Escapement Goal (BEG) was established in 2009. Since then, the lower end of the goal range (19,000) has only been missed one time. The lower end of the range is simply that - anything within the range is considered safe and anticipated to achieve MSY, which is why ADFG typically manages for the mid-point of the range. The BEG is 19,000 - 36,000 large king salmon, with a point goal of 25,500. From 2009-2014, escapement has averaged 23,354; well within the BEG and only about 2,200 fish short of the (mid-range) point goal. Hardly a crisis. It's unfortunate that the terminal area has not been opened for a directed fishery, but the troll harvest has nothing to do with that. Regardless whether or not there is a directed fishery, some catch of Taku kings is allowed each year. These fish are harvested by both sport and commercial fishermen and most are counted against Alaska's treaty chinook quota. This catch has been stable over time and is taken into consideration by ADFG for planning and assessment purposes. We strongly disagree with the makers of this proposal, who claim that Taku River stocks are in a fast decline and in need additional protection. More importantly, ADFG has not identified the Taku River Chinook as a stock of concern.

Troll, gillnet, and sport harvests of Taku River king salmon are well-monitored; regulated under several existing management plans; and subject to additional restrictions as needed through emergency order. ADFG has proven that they have the tools to effectively manage multiple fisheries and achieve MSY escapement in the Taku. It is difficult to think that an additional layering of management would further benefit Taku Chinook, or even other users. To go that route would be costly, complicate management, and increase the potential for overescapement, which tends to depress Chinook runs.

The proposers use the guise of conservation to point to perceived problems with the troll fleet's spring fisheries, but make no mention of guided and unguided harvests that also occur in the outer districts. The troll harvest of Taku kings was anticipated and factored into both the treaty quota and the base catch provisions under the treaty's transboundary rivers agreement. The longstanding system of reporting and aggressively sampling the troll harvest allows for timely and accurate reporting of catch, which is much different than the sport fishery. Troll caught fish are reported on a fish ticket every few days and assessed against the troll fleet's portion of the treaty quota. The quota itself is derived through yet another highly conservative treaty program that also considers the health of Taku.

The spring troll fisheries take place in small areas and, contrary to the claims made by the proposers, are managed with a complex plan that includes triggers and caps and the separation of fish from each of about 27 areas throughout the region. The spring management plan is strictly enforced by fishery managers, who will not hesitate to take additional action when necessary. A prime example occurred during the 2014 spring fisheries in southern southeast. Time and area restrictions were implemented over a large area that included many spring fishing areas, in order to protect Unuk River Chinook stocks.

If a fishing area hits a spring fishery cap, or doesn't catch a certain percentage of Alaska hatchery fish, it is shut down. In 2013 there were less than 77 trollers operating in four unique areas in D14. The harvest was 1,449 fish, but not all of them were wild Taku king salmon. Chinook salmon from other regions and hatcheries feed in and transit this area, as do kings from the nearby Douglas Island Pink and Chum (DIPAC) hatchery in Juneau. In 2014, there were no more than 34 trollers in D14; they caught only 257 kings. Again, not all of the kings caught in this area would have been from the Taku River. Between 2005-2011, trollers averaged less than 1,200 total fish in all D14 areas.

The troll fishery has historically harvested Taku River king salmon, just like anglers and gillnetters. From Statehood until the directed Taku Chinook fishery was closed (1977), the troll fleet averaged 35% of the Taku River harvest share. Considering the modification and improvement of gillnet gear that occurred in the 60s and 70s, it's likely that the troll proportion of the Taku harvest prior to statehood was even higher. Since 2005, directed commercial fisheries have only occurred three times. The restrictive time and area afforded to trollers in the terminal area, due in part to concerns expressed by sponsors of this proposal, led to a catch of less than 50 fish - total - over those three years.

ADFG has taken a neutral stance and called out this proposal as it truly is, allocative. We have to agree, because there is no conservation problem in need of a fix. ADFG does a great job managing fisheries to achieve escapement goals in the Taku River. The only year since the BEG was set that missed the low end of the range (19,000) was 2013 at 18,002 fish. Even that year the fish returned at more than 85% of the goal. In 2014, 23,532 fish escaped - well within the range. The Taku River is not considered a stock of concern by the biologists who study and know them best. We urge you not to impose additional, unnecessary management regimes on the Department.

175 Evaluate potential changes to enhanced salmon allocation plan. OPPOSE

This proposal essentially seeks to reconvene the Southeast Alaska Allocation Task Force to review the Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364). While the troll fleet has chronically lagged behind under the current allocation plan, we do not support re-opening the plan for

review. At this point in time, doing so would be an unnecessary expenditure of time and monetary resources. The reasons that have thus far prevented the troll fleet from reaching its allocated percentage are many and varied. The RPT and individual operators have been working hard to find the right mix of solutions to address the problem. There are a number of new and expanded projects for king, coho, and chum salmon set to come online over the next several years, which could positively impact the troll fleet's hatchery allocation percentage. Therefore, ATA prefers that the RPT continue to work within the parameters of the current allocation plan, in hopes of achieving the goals originally established for all of the Southeast commercial fleets.

176 Develop detailed harvest plans for NSRAA and DIPAC. OPPOSE

Proposal 176 would require NSRAA and DIPAC to develop annual hatchery harvest plans with the intent to achieve the goal of reducing the current troll allocation underage by half over the next 5 years, and completely correct the imbalance by 2024. These plans would have to be approved each year by the Board of Fisheries. ATA is concerned that the proposal might not have the desired effect without significantly disrupting other fisheries. ATA encourages all operators to manage hatchery production and harvest with intent to achieve allocation goals. However, we also believe that it is important to allow hatchery boards the latitude to problem-solve and make decisions based on their unique circumstances. Requiring annual management plans to be developed by date certain, with subsequent Board of Fisheries approval, would create additional workload for the Board and remove important flexibility that our associations need to achieve their many goals and objectives. The RPT and Board of Fisheries' policies and processes allow for periodic review of production, management provisions, and hatchery outcomes - including allocation. ATA prefers to work with the other gear groups to find solutions within the existing system. Hopefully the Board of Fisheries will limit their involvement at this time to acknowledging the troll fleet's chronic underage and encouraging hatchery operators to continue offering us new opportunities as they arise.

184 Open Kendrick Bay Terminal Harvest Area to trolling. SUPPORT

Opening Kendrick Bay SHA to trolling when it is open to the seiners would be consistent with management in other SHA's and provide an opportunity for trollers to get closer to their enhanced allocation goal.

187 Add drift gillnet fishery to the Southeast Cove Terminal Harvest Area OPPOSE

This area was originally designed to be troll and seine only. While ATA doesn't object to all three gear groups harvesting the hatchery fish they pay to produce, trollers remain well below their allocated percent and gillnetters are consistently above. We'd like to see the troll fleet get closer to goal before adding gillnets to the mix.

188 Modify seine and troll fishing schedules in Southeast Cove THA. OPPOSE

193 Restrict and prohibit seining in portions of D12 & D14 to protect subsistence. OPPOSE

ATA opposes eliminating any fishery without reasonable justification that doing so will provide a meaningful solution to a problem. Fishery data, run timing, and genetic stock identification do not support a direct correlation between the seine fleet harvest and the success of Angoon subsistence users. Many other factors appear to be impacting the resident's subsistence harvest, including a declining population and loss of over 150 commercial permits since the 1980s. In addition, it would appear that ADFG and the seine fleet has been making accommodations in an attempt to address concerns and help meet the subsistence priority. Taking away ADFG's management flexibility could harm the seine fleet and Southeast communities, yet provide no benefit to subsistence users in Angoon.

194 Close portion of Lisianski Inlet to seining. OPPOSE

This proposal would lock the seine fleet out of a historic area without sufficient cause. Recent years have seen extremely large concentrations of pink salmon in the area, which has attracted more seiners than normal. Hopefully, as pink salmon abundance returns to more normal levels there will be less tension between fishermen in the area.

195 Close portion of Lisianski Inlet to seining. OPPOSE

This proposal would lock the seine fleet out of a historic area without sufficient cause. Coho stocks have been robust for many years and stocks in the Lisianski area are highly mixed. Recent years have seen extremely large concentrations of pink salmon in the area, which provide important feed and nutrients to other species, like coho. However, ADFG reports that in big pink years, like 2013, there have been large die-offs in some streams - of both pinks and juvenile coho - from oxygen deprivation as a result of overcrowding. It is important that these large pink runs be harvested.

199 Prohibit seining within the possessory boundary of Angoon for 5 years. OPPOSE

See Proposal 193

200 Close waters within Admiralty Monument proclamation boundary to commercial seining. OPPOSE

201 Close certain waters of Chichagof and Admiralty Island to seining. OPPOSE

208 Restrict mesh size to 6 inches in D8 during years of no directed king salmon fishery.
SUPPORT with amendment

ATA supports a 6" mesh restriction in D8 during years with no directed king salmon fishery for the following reasons: a) as a tool to conservation of Stikine River king salmon; and, b) to allow trollers better access to Anita Bay hatchery kings.

In years when there is no directed king salmon fishery, a 6" mesh restriction is often implemented during the D11 sockeye fishery to avoid catching kings. There is no similar rule enacted in D8 and it appears that the manager might not even have EO authority to do so. In recent years D8 gillnetters haven't caught many wild king salmon, but that could change. At minimum, it would make sense that all tools, including a 6" mesh restriction, be available to address the wide variety of circumstances that confront ADFG managers.

Please note that this proposal would benefit from an amendment to ensure that it is not imposed for the entire year, which could be the effect of this proposal, as written. Southeast kings return in the spring, so restrictions during that timeframe seems reasonable, but gillnetters must be allowed to use larger mesh at other times of the year to catch hatchery fish and large coho; reduce impacts on other species; etc. Therefore, barring any significant conservation need, ATA would like to see a mesh restriction put in place only until July 1.

Restricting gillnetters to sockeye nets through July 1 in years without a directed fishery would allow trollers better access to returning Anita Bay king salmon. At 18%, trollers are still chronically behind in the hatchery allocation (range is 27-32%). Gillnetters are averaging 35% and remain consistently over their range (24-29%). A short-term mesh restriction, during a sockeye opening, could provide another opportunity to help correct this imbalance, particularly given the high value of king salmon. Trollers and gillnetters fish some of the same spring areas and compete for Anita Bay fish. As a practical reality, trolling in proximity to a working net fleet usually leads to significant reductions in troll harvest. By July 1, most trollers head to the outer districts to begin the summer fishery, so a mesh restriction would be in place a relatively short period of time and some hatchery fish would still be available to gillnetters when the mesh restriction is lifted. Reducing competition with gillnetters for a couple weeks in the terminal areas would give trollers a better chance to catch fish that are being produced to mitigate their losses under the salmon treaty. And again, the restriction would only be in place if there was no directed Chinook fishery in the district.

220 Modify Yakutat winter troll boundary line. **OPPOSE**

ATA opposes a line modification at Yakutat, because it is likely to increase the winter catch.

Boundary lines for the winter troll fishery were set quite some time ago with a view to distributing a relatively small quota between a three-season fishery and large, diverse fleet. This was a contentious negotiation amongst the fleet and many lines were brought in to slow down catch. Even with a relatively small number of trollers, the Yakutat fleet has averaged 10% of the entire winter harvest over the last 10 years, with a high of 17% in 2013. It would be difficult to support this request for Yakutat without some parity for areas like Sitka or Craig, etc. In addition to winter fishery lines, other provisions were put into a package of regulations that ATA is

often hesitant to modify, because, while not perfect, it has worked relatively well for the fleet overall and was a compromise deal.

A little history might help here:

In 1992, catch in the winter fishery was growing fast, primarily due to increased Chinook abundance. Catches that had run about 25,000 shot up in the early 90's. This, coupled with substantial growth and catch in the guided sportfishing industry collided with a very low treaty quota. Chinook were allocated between commercial and sport and trollers were tasked with trying to address a dwindling catch share and shorter summer season. The Board of Fish established a Chinook Troll Task Force (Task Force) and charged them with designing management changes that would:

- ensure a minimum summer season of 10 days, preferably 20
- minimize the incidental mortalities to the greatest extent possible
- maximize the value of the troll product
- recognize the historic composition of the fisheries

(BOF,92-133-FB)

The Task Force was made up of 12 trollers representing all sectors of our diverse fleet, and all geographic fishing areas, from Dixon Entrance to Yakutat; 2 processing representatives; and, the ADFG troll manager. The Task Force's primary goals were:

- to comply with the Board of Fish mandate,
- to maintain traditional fishing and management patterns, and
- to maintain the historic allocation

The winter fishery was the most contentious part of the Task Force's work. They recognized the winter troll season as extremely valuable to the region's economy and also that Chinook abundance was going up. Harvest caps were discussed, from 0-70,000 fish. Ultimately, they chose 45K, as a mid-range, which was also about twice the historic average catch. Then, actions were taken, like line changes in highly productive areas. The goal was to balance healthy winter and spring fisheries with the need to move some fish to the summer fishery, and to extend the season and reduce incidental mortality. Any future surplus quota fish were anticipated to accrue to either expanding the spring access fisheries to catch hatchery add-on fish that don’t count against the quota; or to the summer fishery, to achieve the stated BOF goals.

Unfortunately, on average, the Chinook quota is still close to what it was in 1992, despite rebuilt runs and good to excellent abundance. This makes it important to continue saving fish for the summer fishery where we can. Most winter trollers also fish the spring and summer fisheries, so the fish saved are still accessible to them.

222 Clarify that spring troll fisheries are based on Alaska hatchery-produced kings. SUPPORT

223 Change troll fishery king salmon summer harvest proportions from 70:30 to 60:40. OPPOSE

ATA opposes changing the summer troll harvest proportion, which was also implemented under the Chinook Task Force plan discussed at proposal 220. The question of whether or not to change this proportion has been debated by trollers for many years and we continue to hear concerns. Many trollers think that waiting until mid-August to harvest a bigger portion of king salmon could make it difficult to harvest the full quota and could have disproportionate impacts on trollers around the region, particularly north to south.

The Task Force developed the current troll management strategy based on roughly 263K, which was the treaty quota at the time. In the early to mid-1990s the quota was modified each year for treaty, ESA restrictions, and the trollers' repayment of a large quota overage taken by the guided sportfishing industry. The point being that the Task Force was working with a lower number than we will likely have this year, yet they still established a 70:30 split, in part, to make sure that all the fish got caught and that trollers throughout the region had fair opportunity to catch them.

Abundance, availability, catchability, and weather can be significant factors, especially from mid- August on. There can also be differences between northern and southern Southeast. Moving fish later in the year could hurt the southern troll fleet. As for lengthening the season, again that can vary greatly – as witnessed last season when CPUE in July and August was much higher than normal and the fish were harvested quickly.

Another thing to keep in mind is that relying on an abundance index (AI) could get tricky, because the quota associated with them has changed over time. In 1999 the quotas associated with the AI's were higher than in 2009, and it could change again in 2019 when the treaty is renegotiated, if not before.

224(ATA) Allow ADFG to implement trip limits if there is insufficient Chinook quota remaining for a competitive troll opening. SUPPORT

The troll fleet would like to see an option put in place for ADFG to utilize trip limits to harvest relatively small numbers of Chinook salmon that might otherwise be left on the troll quota. There is a regulation of this type on the books for lingcod with similar language to our initial proposal. ATA has been working on specific trip limit methodology and intended to present it by way of these written comments. However, there has been a change of plan since receiving staff comments and finding that ADFG opposed the trip limit concept. We disagree with several of the department's conclusions regarding anticipated problems, so contacted them. The result is that ADFG committed to meet with ATA to try and work through some of the issues. ATA hopes to deliver a mutually agreeable concept for your review early in the Sitka meeting.

226 Remove sunset clause from D12 & 14 hatchery chum fishery and change its status from 'experimental' to permanent. SUPPORT

227 Remove sunset clause from D12 & 14 hatchery chum fishery and allow ADFG to open fishery for up to seven (7) days per week. SUPPORT

In 2012, the Board approved the Northern Chatham Strait Enhanced Chum Troll Fishery as an experimental fishery with a sunset, due to a lack of data. It's since been found that the fishery catches about 85% hatchery. Over the past 5 years wild chum indicator stocks have met escapement goals in 4 of 5 years. In addition, there

are no known conflicts with anglers utilizing the area. Therefore, we believe this fishery is a good candidate for a normal management regime and request that the experimental designation and sunset provision be removed. Additionally, we ask that the fishery be allowed up to 7 days per week. This would help the fleet attract a buyer to the area. The short timeframe of the fishery has made it less than desirable for most processors. Reliable packer service would benefit the fleet with less running time, and could also help to improve product quality.

228 Close the commercial troll fishery from August 1-10 each year. OPPOSE

ATA strongly opposes implementation of a mandatory closure and questions the need to digress to old school management practices that don't benefit the resource or user groups. The fishery is presently managed on wild stock coho abundance, which is evaluated in-season, based on real-time data. Any closure of the troll fishery could be 1 day to 3 weeks, or more, depending on the needs of the coho resource. This form of sustainable management is Alaska's hallmark and has proven superior to arbitrary, fixed-length closures.

Proposers state that fish are not making their way to the inside areas because of the troll fishery, but no supporting documentation is presented to support their claims.

The data we've reviewed shows no meaningful correlation between troll openings and success rates for the inside fisheries. In fact, it shows that there is very little you can do to the troll fleet that predictably moves fish to inside waters, particularly in years that the fish want to hang offshore feeding or waiting for rain. For instance, in 2010 the troll closure was just 4 days, yet the gillnet fleet more than doubled their coho allocation and trollers came in under their allocation.

Escapements are being met, there are large runs most years, and gillnetters are over their allocated percentage; from 1989-2010 they were over their percentage 50% of the time. That just wouldn't happen if the troll fleet was preventing adequate numbers of fish from making their way to inside waters.

ADFG pays close attention to conservation needs of the stocks and the status of inside fisheries, prior to making decisions about troll closures. Troll closures have ranged from over 30 days in some areas to zero days regionwide. On average, the troll fishery is closed 4-5 days in mid-August. Only one year in recent history has the fishery been closed less than 2 days, because there is always a two day closure before the August Chinook fishery. ADFG conducts a mandatory assessment in late July, to determine whether or not the troll fishery needs an early conservation closure.

Many things can account for low catch rates ranging from coho behavior and size, to weather, to management changes over time, to what species is most abundant and/or valuable, or whether people are actually fishing. There is no doubt that Angoon's has seen a steep decline in both residents and fishing permit holders. That has got to be effecting subsistence harvest and all other fisheries in the area.

Proposal 228 makes unsupported claims with respect to both conservation and allocation. The data clearly shows that the length the troll closure has little to no bearing on the inside fisheries.

Comparing gillnet and troll catches reveals no correlation between the length of the troll closure and success rates for inside fisheries. In fact, the gillnetters have had some of their best coho fishing in years with shorter coho closures. In 2000, trollers had a 10 day closure and the gillnetters caught just 11% (2% below allocation) and trollers caught 67% (6% above). In 2003, there was ZERO troll closure and the gillnetters caught 20% (7%

above) and trollers caught just 58% (3% below). In 2010, the troll closure was 4 days – gillnetters caught 25% (roughly twice their allocation) and trollers caught 60% (under). Many of those fish would have traveled through the waters around and near Admiralty Island.

Coho fisheries are well-managed and all user groups are benefitting under an abundance-based system, which allows for variable length closures based on the needs of both the resource and all user groups. A mandatory 10 day closure is unnecessary, is unlikely to produce the effects desired by the proposers, and would cause significant financial harm to the troll fleet.

If a mandatory August 1-10 closure had been implemented in each of the last 10 years, the troll fleet would have lost, on average, $2.23 million dollars each year. That would have meant forgoing about 2.6 million coho salmon with an ex-vessel value of $22.3 million.

229 Open an area between No. Chatham Strait and Homeshore to trolling, to allow transit for trollers participating in D12 & 14 hatchery chum fishery. SUPPORT

This proposal is attempts to correct a logistics issue for trollers fishing chum in D12 and D14, who have to pull their gear or troll many miles out of their way just to transit between Chatham and Homeshore. This may not seem so problematic until you know that most trollers have a top speed of only 6-8 knots. Trollers have worked with ADFG to draw lines that would allow a small transit corridor. That chart can be found in staff comments.

230 Restrict trolling in 15-C on July 1 to be concurrent with the drift gillnet fishery. OPPOSE

Forcing trollers to fish 15-C concurrent with the gillnetters would effectively close an area traditionally open for trolling, simply based on a supposition that the troll fleet will expand in number and harvest.

It would take a big increase in effort to push the troll catch to any significant level in this area. Effort to date has been so low (<3) that for most years that the data is confidential. Since 2005, a handful of trollers in 15-C have caught a total of 4,715 chum.

A large increase in effort is highly unlikely given the difficultly trolling around gillnetters, the terminal nature of the fishery and the dampening effect of those things on troll catch rates. There are better troll opportunities elsewhere that time of year; 15-C is unlikely to see a large influx of trollers.

Gillnetters have little to fear from trollers; gillnet harvest rates are usually many times that of trollers. For example, in 2005-06, troll and gillnet CPUE in the District 11 fishery was 0.2 and 4.3 respectively. To compare, CPUE in District 8 averaged 2.4 for troll and 10.6 for gillnetters in 2006-2008 – that's 5 gillnet fish for every 1 fish caught by trollers. In 2008 alone, that ratio was 7:1.

231 Reduce area opening to trolling in Naha Bay. OPPOSE

Is this a sanctuary from all gear types fishing wild salmon, or is it just to keep commercial trollers out? The West Beam Chum fishery is important for about 200 trollers on average who target Neets Bay hatchery chum from

late June until into September. ATA opposes arbitrary imposition of marine sanctuaries, particularly those without a reasonable, scientific purpose and well thought out goals and objectives. The supporters offer no data to back their conservation claims. Information on the river systems located around Loring is limited, but ADFG's 2014 aerial and foot surveys revealed evidence that the runs are healthy and abundant, which is consistent with past years. The proposal will add complexity to enforcement. In addition, incorrect information is given about a local boundary marker. This marker was not moved to a different location; it just went missing and was replaced to original position by ADFG as soon as it was noticed.

233 Allow downriggers as legal commercial hand troll gear year-round. SUPPORT

ATA supports expanding the current winter regulation and allowing the year-round use of two fishing rods attached to two downriggers, by those handtrollers who prefer this option to hand gurdies.

AITA
Tending to our Future

Alaska Independent Tenderman's Association

P.O. Box 431, Petersburg, Alaska 99833

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

Re: Opposition to Proposals 123 and 124

Dear Members of the Board of Fish,

The Alaska Independent Tenderman's Association is a non-profit organization representing a diverse group of independent tender owners, operators and crewmen that participate in fisheries all across the State of Alaska with vessels ranging from small wooden river scows to large steel crabbers. Our mission is to put forth one unified voice to the issues that affect tendering operations in Alaska.

Proposal 123 and 124 have been before the board for the last 12 years in one form or another. Are we revisiting the Grunert decision? It seems to us that based on historical catch rates that some permit holders will benefit while others will be adversely effected because of their catch rates.

There is an economic dependency upon this fishery far beyond the permit holders. The consolidation of this resource will have a profound economic effect on tender owners, operator's, crewman, their families and the communities that they live in as well as the spotter pilots, marine services, support systems in Sitka and the communities that the Seafood Companies have process this resource. The number of tenders that participate in the fishery varies each year accordingly to the GHL and that is to be expected. What is not expected is to have possibly 75% of the tender fleet removed from the fishery that have historically participated.

We all have watched what has happen with the rationalization of other fisheries across the state and the economic impact that occurred. Taking all the economic power and putting it into relatively few hands without considering all the parties impacted would take us back to the beginning of rationalization in Alaska. One would think that other entities involved in this fishery that have a dependency on this resource would also require an equal share. The tenders have historically packed the majority of the fish in the Sitka Sac Roe Fishery.

The permit holder is paid by the ton based on roe percentage and market conditions in Sitka. Those conditions change from year to year. Some years the values are high. This is not so for Tenders. Tenders are paid a set rate per ton for what they pack. The average price per ton to a tender is around $ 190.00 in this fishery. When the value of the fish go up to the permit holder it does not go up to the tender. In years of low value permit holders look to try and cut cost and put more into their pocket. Cutting tenders out has always been the first go to expense to cut. With low market value and low GHL this year, that is exactly what has happened in Sitka. The permit holders have Co-opted the fishery and consolidated. The tenders have been told they are not needed and do not have a job. In one instance that I am aware of, the tender was told he would have to take a cut in the price per ton he was paid to be one of the few to participate.

We believe that before any consideration of consolidation is done to this fishery an economic impact study should be done to look at all the ramifications such proposals would cause. Thank you for considering our comments.

Sincerely,

Lisa Terry
Executive Director
Alaska Independent Tenderman's Association

Submitted By
Carl Peterson
Submited On
2/9/2015 3:32:57 PM
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Chum Trollers Association

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Dear Mr. Chairman,

This letter is written in support of proposal 229 which establishes a corridor between the area in District 14c known as Homeshore and the area along the Admiralty shore proposed in Proposal 226. The corridor proposed is near Swanson Harbor which is the best and safest harbor in the vicinity. Presently a run of about an hour is required from Swanson Harbor to reach areas open to fishing.

Several advantages to having the area available to trollers would be that fishers would not have to pull their gear when transiting between open fishing zones. Also this proposal would have the effect of spreading the fleet which would expand reliable tender service to Swanson Harbor. This would reduce running time and congestion at the end of the day. Furthermore, the turbulent tide rips south of Pt Couverdon may provide very productive fishing opportunities.

For these reasons your favorable consideration of Proposal 229 is requested.

Carl Peterson

Board Member

Chum Trollers Association

Submitted By
Carl Peterson
Submited On
2/9/2015 3:42:29 PM
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Chum Trollers Association

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Dear Mr. Chairman,

This letter is written in support of Proposal 226 which establishes a four day a week fishery along the Admiralty shore in District 14. As a troll chum fishery developed over the years trollers have struggled to find areas to fish where they could increase their catch. Homeshore is a great example of such a fishery. One of the biggest problems, however, has been consistency. One year the fishing is productive and the next is like fishing in the Mojave Desert. The thought has been that maybe some years fish return to the DIPAC hatchery via Icy Strait and other years via Chatham Strait. In 2011, in an attempt to expand the area available for fishing and to test this theory, the CTA worked with the Territorial Sportsman Association and the Department to establish an experimental fishery. The area was south of Funter Bay along the Admiralty Island shoreline to Hawk Inlet. The four day a week proposal was passed by the BOF and contained a sunset clause of 31 December 2014

.

Frankly the experimental fishery was less than conclusive. Only two years of data was collected. Tenders were hard to schedule and fishing time was lost at the end of the four day fishing period as vessels relocated to open fishing zones. For these reasons the fishery saw little participation by trollers

The agreement which established the experimental fishery precludes the CTA from endorsing a proposal such a 227 which provides for a seven day a week fishery in the area and to that extent 226 is an imperfect proposal. It does, however, preserve additional opporrunity for a viable commercial fishery. For that reason the Chum Trollers Association urges adoption of Proposal 226.

Carl Peterson

Board Member
Chum Trollers Association

Opposing 231

Mr. Chairman and the Board of Fish.
As chairman of the Chum Trollers Association I speak with 1 voice for 110 members.

This proposal has no science to substantiate it's claim. Fish stock returns to Naha Bay have not been tagged, marked or counted, therefore no record exists to determine whether these stocks are wild or diminishing.

If pink, chum, and/or sockeye are diminishing it is assumed these fish were caught in Naha Bay itself. With 2 to 4 years in open ocean conditions it is possible these fish could have been intercepted by multiple gear groups or natural predation.

Neets Bay is a very nearby and major component to the SSRAA aquaculture program. It is the only aquaculture association in SE. Alaska that offer trollers un-interupted access to the salmon returning to the Neets Bay THA.

It would be detrimental to the gear group farthest behind in their allocation to close Naha Bay to the trollers, especially considering SSRAA's efforts to see this gear group is given opportunity by establishing a successful troll sanctuary so near.

Finally, trollers fishing in Behm Canal have only three anchoring choices in a 9 mile stretch of water, with Naha Bay being the most western. This proposal would add additional hardship to the troll fleet by removing the ability to troll in to the anchorage.

With sincerity and respect,
Linda Danner Chairman
Chum trollers Association

Submitted By
Daniel Patterson
Submited On
2/9/2015 3:25:58 PM
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Seattle, Washington 98119

Length = ls as stated on a vessels official documents.

I am a purse seine vessel owner and operator and have had the exciting privilege of measuring a vessel at the dock to satisfy an anonymous citizen the day before I was leaving for the summer season. At the time I was a hired skipper on a tender charter. The wind was blowing, the boat was surging on its lines back and forth, and with two of my crew members and a Fish and Wild Life enforcement officer we did our best to unload all the tender cargo onto the dock, and established a normal operating trim. Now, save all your comments, we were just doing our best, and I know, I've heard it a millions times since that day, "that's not how you measure a boat".

The concerned citizen had reported that our vessel was "definitely over 58 feet" It wasn't a great time for yellow tape and a delayed departure. We were heading out to gillnet tender and in fact there was no 58' limit for tendering. Despite the timing, it seemed better to be available at the dock then later during a fishing season.

The vessel owner was engaged in another fishery and not available by phone.

The vessel had a CFEC/ADF&G triangle and current CFEC area tag, and a current AK registration sticker for the year. In the vessel documents, I produced the CFEC registration that stated the length, as well as an Alaska State registration receipt that stated length. There was a recent marine survey that stated the vessel length, as well as a United States tonnage document that stated its length.

To satisfy the concerned citizen we set out to measure the boat. It took three days and we came up with various vessel lengths with a range of nearly 2 feet. Our field measurements did not match our documents.

"Dock measured length" was not on any of my documents, but it was what we came up with. The boats trim had the most significant impact on the measured length. The painted water line was not parallel with the deck or the keel as far as we could tell and the bulkheads were not at 90 degrees with the deck. The boat could be loaded in the front and the plumb bob hung out past the end of the bulbous bow. But empty holds and a seine on the stern the plumb bob swung aft and the rake of the bow became more vertical and the vessel measured shorter. Our "dock measured length" had a range that was affected by wind blowing the plumb bob, vessel trim options, and numerous definitions for where we started measuring and ended, that made the whole process subjective.

The officer and I conferred that bulbous bows were not included in the measurement, but the current Area M 2009 salmon regulations book that I had on board did not comment on bulbous bows or anchor rollers. I had nothing in writing. Questions continued to arise during the process. The offensive over length part, from the dock, was the bulbous bow.

A marine architect had decided the bulb length for efficiency through the water and a professional marine surveyor had measured the rest of the boat out of the water. The vessel documents and current decals should have represented us in this matter.

Typically the USCG is the governing body in this matter and they delegate vessel measurement to a short list of qualified organizations. Its not practical to measure a boat in the water and its not industry standard. "Vessel Length" is an operational word that incorporates the hundreds of intricacies of vessel design, purposes, function and capacity. Maritime tradition and precedence are also factors, that influence measurement guidelines that accredited agencies refer to when measuring boats.

This example is a pretty familiar one. For the purpose of Alaskan fisheries we have decided that bulbous bows are not included in a vessels length description. We are conscious of our environmental impact because we live off it and it makes an existing piece of equipment more efficient. The USCG omits swim steps, trim tabs, motor brackets, bumpkins, other attachments and anchor rollers in fishing vessel length. Buoyant envelope is the defining figure they are after. Our Alaskan length limit is an effort to manage the catch capacity of our fleet, to aid the fisherman and biologist management partnership.

Stabilizer poles and divers change the performance character of a narrow boat to that of a wider boat. A bulbous bow makes a short waterline more like a longer waterline. A purse seiner can have a main boom that extends aft beyond its stern and side rollers that extend beyond its beam. These extremities allow the machinery to operate outside of the buoyant envelope. An anchor roller extends beyond the hull and if you measure an anchor roller you are measuring a piece of rigging that does not affect the buoyant envelope. Innovations in rigging have increased our vessel efficiency and ability. The above are elements of rigging that operate outside a vessels buoyant envelope that are common, appropriate and not a part of a length definition we are trying to manage.

There is an open description of an attachment. This allows for innovation and a wide range of water craft. No limit to the length or style of an attachment, it can be a thirty foot long catwalk for spearing sleeping sword fish or a wooden carving of a topless maiden, or an inflatable duck. With these established trends in mind an attachment or rigging can have any shape it needs to. If someone is afraid of sea monsters they can have a topless a seamaiden under their bow sprit. If you take a WWII amphibious landing craft and perch an inflatable duck on its roof you can parade it around town. If someone cuts off their bow, and repurposes the old material as an attachment for the anchor, it can look just like a bow.

Boat builders, accredited surveyors and boat owners have been using these standards. I seine Salmon for a living. The vessel I own now was purchased because it could Seine Salmon in Alaska. I bought a seine permit for my boat and a net. I called the Coast Guard my self, read the current Alaska regulations and provided pictures of what I intended, and with the guidance of an accredited surveyor I had my boat rebuilt to the published standards.

The CFEC references the USCG measurement description for its fees. What the USCG determines for length is a workable definition for our purposes. The Alaska department of Wild life enforcement office is not authorized by the USCG to measure boats. Length has been traditionally determined by surveyors who can approach the task on land in a controled maner with the luxury of time.

Then there is the case that I do not use my boat for recreation, I use it for work. When it's in the field I am working, its just like being in a conversation on the phone. No one really likes the interruption. I would like to do the administrative and legal compliance aspects of this business when I'm not in my raingear engaged in a fishery, or loading the boat on a charter. Year after year the enforcement officers are patiently waiting in their zodiac for a moment in between a salmon set for an appropriate moment to board. Lets continue to make that transaction as streamlined as possible.

The coast guard does complimentary safety exams in the off-season to stream line its marine safety compliance program. You get a sticker. They see the sticker at sea they know you are in compliance. This is done prior to the fishing season.

Our Fish and Wildlife enforcement officers can scan the marina or bay and see your triangle with a current area and year tag and know that you are compliant. I am comfortable that a sticker means you have paid your fees for participation for the year and that your vessel is compliant with the current set of rules. This way, fisherman who are not naval architects can concentrate on fishing and our enforcement officers are free to enforce the numerous other possible violations as they relate to management of the resource.

Lets continue to have accredited surveyors measure boats for the USCG with all the critical factors in mind. The CFEC does a great job regulating participation before the season. Lets support their efforts by recognizing the documents they produce and allow enforcement to reference those documents if needed in the field.

Southeast Alaska Fishermen's Alliance
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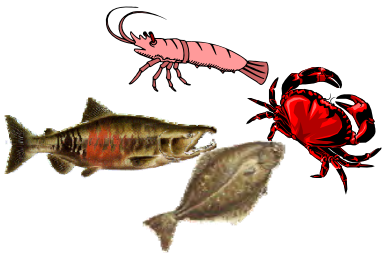

February 9, 2015

Alaska Department of Fish and Game
Tom Kluberton, Vice-Chairman
PO Box 115526
Juneau, AK 99811-5526

RE: Southeast & Yakutat Finfish Proposal Comments

Dear Vice-Chair Kluberton and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species non-profit membership based organization representing our 300+ members involved in salmon, crab, shrimp and longline fisheries of Southeast Alaska and Yakutat. Our longline division represents our members in groundfish fisheries in Southeast Alaska and halibut fisheries in SE and the Gulf of Alaska. We appreciate the opportunity to offer these comments on the proposals for the upcoming Board of Fish finfish meeting.

SEAFA has no written position on any of the herring proposals but may offer comments during the Board of Fisheries process.

Proposals 131- 134: SEAFA supports these proposals to allow the use of pots for sablefish in the inside waters of Southeast Alaska with the development of a regulatory regime that would allow a fisherman to choose the gear (longline or pots) that is suitable for their operation and to minimize conflict between the different gear types. We support this potential change as a conservation measure to help reduce mortality of sablefish due to whale predation.

Proposal 135: Support. We see this proposal as housekeeping if the above proposals are not adopted.

Proposal 136 & 137: Support. SEAFA supports the adoption of a reasonable harvest limit or restrictions for personal use sablefish fishing. Since there already is a harvest record required in this fishery, the regulation for an annual limit could be easily integrated into this program of recordkeeping. Having an annual limit of sablefish or a vessel possession limit or limiting the number of hooks will help reduce the abuses of putting out more gear than necessary, and slow down personal use sablefish from being sold because of having caught excess fish. If a hook limit is implemented SEAFA believes if should be more like 50 or less hooks per set. You can make a second set in a day if you don't get enough but more hooks than this leads to waste. Table 136-1 of the RC2 (Staff Comments) estimate the average number of hooks per permit, per year fished was 235 and 160 for 2012 & 2013 respectively. Sablefish stocks in both SE state and federal waters have been on a decline (RC2 staff comments) and there is no evidence of a strong recruitment class coming into the fishery.

Proposal #138: Support. SEAFA supports the Department's proposal to require dinglebar, mechanical jig, or hand troll gear groundfish fishermen to report their data providing latitude and longitude in the logbooks so actual harvest is accurately accounted for per statistical sub-district. Better accounting helps maintain sustainable fisheries.

Proposal #139: Support. SEAFA supports defining mechanical jigging gear separate from the dinglebar troll gear. Clarity in regulations is always helpful.

Proposal #140: Oppose. SEAFA opposes changing the size limit of commercially caught ling cod. There are no known conservation issues with ling cod in the Southeast region. The 27" size limit on ling cod was based on biological information to protect immature females. The proposers are trying to match the sport fish size limits with the commercial size limit but the sport fish size limit is a result of allocation (i.e. the size that keeps the harvest below their GHL for the year).

Proposal #142 & 145: Support. SEAFA considers both these proposals housekeeping as they have no effect on the fishery or regulations because the regulations published by EO yearly are more conservative.

Proposal #113: Oppose. SEAFA opposes this proposal by the Naha Conservation Society to establish a marine conservation zone which would prohibit all (commercial, sport & personal use) bottomfish, crab and shrimp fishing. This proposal was considered in 2012 and at the January meeting for shellfish and did not pass and we do not see any conservation or biological reasons on any of these species for adoption this cycle. There are closed waters near Cache Island already.

Proposal #144: Oppose. SEAFA opposes this proposal to repeal mandatory retention requirement for non-pelagic rockfish. This regulation was implemented in order to help conserve the resource and keep the sport fish fishery within their allocation.

Proposal #146, 147 & 148: Support. SEAFA supports revising the salmon amounts necessary for subsistence (ANS) for the Angoon (District 12) and Hoonah (District 14) by separating them from the non-subsistence area of Juneau and District 16 which does not have a C&T finding for the district. SEAFA supports and acknowledges that subsistence customary and traditional use is a priority in the State of Alaska.

Two proposals were submitted to the Board of Fisheries for consideration during the **2009 cycle** that requested changes for Angoon, one was to the Amount Necessary for subsistence on an individual stream basis. Provided below is additional information on this proposal and why the decisions were made in 2009. Failure to act on this proposal in 2009 is part of the background basis for the ETJ petition submitted by Kootznoowoo and their justification that the State of Alaska processes does not consider their subsistence priority. Proposal #236 was a request to modify findings regarding the amount of salmon reasonably necessary to provide for subsistence uses (ANS) in the Southeast Alaska Area. The staff comments for this proposal summarized how the ANS finding for Southeast Alaska salmon were determined in 2006 which replaced the 1993 finding. At the Jan 2006 meeting, the previous finding was considered low because it was based on reported rather than estimated subsistence harvest. The current ANS findings are for Districts 11, 12, 14 and 16 combined at 4,178 – 10,133. During the committee meeting held during the middle of the Board of Fish meeting (committee C) there was a discussion of this proposal and the committee report summarizing the discussion contained the following statements.

Department: Department cannot manage a subsistence salmon ANS (Amount Necessary for Subsistence) on a stream specific basis.
Federal Subsistence Representative: stated that they support using the best available information but are neutral on what the ANS numbers should be or how they are derived.
Support: Support the department's option 2 in Staff Reports (RC3) (which was to take no action, with a directive to ADF&G and the public to develop comprehensive options for the next Southeast Alaska Finfish meeting (in 2012) for more precise ANS findings for salmon).
Opposition: Public expressed concerns about managing for specific stocks as opposed to mixed stocks, as agreed to in the US/Canada Pacific Salmon Treaty.
The board took no action and directed the Dept. to look at this more comprehensively and suggested that another proposal be submitted next cycle sub-dividing the ANS finding to derive an Angoon Community ANS separate from the rest of the Juneau Management Area. During deliberations, Board members tried to work further on developing a current ANS findings but the subsistence staff was unable to produce at such short notice the information being requested and prior ANS worksheets. No proposal was submitted in the 2012 cycle. Failure to act on this proposal is part of the justification for the ETJ petition and the failure of the State of Alaska to consider the subsistence priority.

SEAFA believes that an ANS finding for salmon should be for a reasonable opportunity to gather salmon of ALL SPECIES combined and from a combination of systems. We do not support setting an ANS finding for just sockeye salmon from just the Kanalku system. Part of the change to the access to sockeye specifically for subsistence was that historically seine vessels would keep sockeye from their commercial catches. When it got to the point where there were no more seine vessel owned by Angoon residents was at the point when Angoon residents started to be concerned about meeting their subsistence needs. While there isn't access to local seine vessels anymore there are charter vessel within the village that are capable of crossing Chatham Straits to fish some of the traditional other sockeye sites.

Proposal #154: Support. SEAFA supports this Department proposal to correct the regulations moving the District 5 Shipley Bay gillnet fishery from the personal use section to the subsistence section.

Proposal #155: Oppose. SEAFA does not support party fishing on charter vessels. A bag and possession limit belongs to the individual fisherman not to the charter vessel. This definition is consistent across the state and should be maintained and is also consistent with federal halibut regulations.

Proposal #156: Oppose. We don't believe that bow and arrow is an appropriate gear type for fishing.
Proposal #157: Oppose. SEAFA opposes changing the sport fish king salmon size limit from 28 inches to 26 inches. We believe that there would be Pacific Salmon Treaty considerations to this proposal and would require changes to the sport fish king salmon management plan to provide additional management measures.

Proposal #158: Oppose. SEAFA opposes this proposal requesting set bag limits on an annual basis. The king salmon management plan has been working fairly adequately since 2003 to maintain the sport fishery within the sport fish allocation but even so has still with changing bag limits inseason exceeded its share of the allocation in 2006, 2007, 2008, 2009 and 2010 although some years was very close.

Proposal #159 & 160: Support. SEAFA support this proposal even though there is no conservation concern for salmon. Our preferred solution would actually be to change the possession limit so that processed fish counts as part of the possession limit and therefore a possession limit is actually a possession limit as it is in almost any other state. In our belief in listening to SE RAC meeting that the issue this proposal is trying to address is the large amount of fish that a non-resident takes home and then trades and sells to neighbors in order to finance the fishing trip to Alaska. Non-residents should be required to fill out harvest records and have limits before subsistence or personal use fishermen should have these requirements.

Proposal #166: AMEND. SEAFA supports part of this proposal and opposes part of this proposal. SEAFA supports changing the effective date for D-11 sport fishery to April 1st to help simplify and clarify regulations. SEAFA does not support opening the upper waters of Taku Inlet. We strongly feel this proposal has Pacific Salmon Treaty implications; this area was closed to

protect king salmon and rebuild the run. An extensive process through the Juneau Douglas Fish and Game Advisory committee reviewed this closure when the PSC considered the Taku and Stikine fisheries as rebuilt and started allowing directed fisheries when there is surplus fish to escapement allowed to be harvested under the sharing arrangements negotiated under the Pacific Salmon Treaty. The Taku king salmon did not meet escapement goal in 2014 and another poor return is expected in 2015. This is not the time to make changes that harvest additional Taku king salmon.

Proposal #167: Support. SEAFA supports this proposal. The Department has been implementing these regulations by yearly EO's – this puts the current practice into regulation.

Proposal #168: N/A based on Proposal #167.

Proposal #172: Support. SEAFA supports this Department proposal to clean up unnecessary and confusing regulations.

Proposal #173: Oppose. SEAFA opposes this proposal that would require the board to address habitat, conservation, subsistence priority and consult with local affected communities if C&T subsistence might be affected. The Board of Fish currently through their legislative, regulatory, policies and guidelines are already required to address and consider habitat, conservation and subsistence priority. The individual board members may not publically convey all their considerations and elaborate as fully as this proposal would require on the record but they are a part of the current process. The portion of the proposal that local affected communities if C&T subsistence might be affected must be consulted is also a part of the process if the members of the community took part in all aspects of the Board process by establishing and participating in a local fish and game advisory committee, by having local tribes and community associations submit written testimony providing information about possible effects of a proposal and by participating in the board meeting.

Proposal #175: Oppose. SEAFA opposes at this time the establishment of a new task force. If changes to the SE Enhanced Allocation Plan becomes necessary it would become apparent to the Regional Planning Team (RPT) and they would be the appropriate body to take steps to reconsider the

allocation plan. An important component of the SE Enhanced Allocation plan is the Board of Fish Finding (#94-148).

Proposal #176: Oppose. The SE Enhanced Allocation plan is a **region wide** plan and not a species and site specific plan. While the proposal states the joint RPT and hatcheries have failed to develop a successful solution to solve the troll imbalance there are other factors that influence decisions. The hatchery associations spend the largest portion of their budgets trying to provide coho and king salmon to the troll fleet. What the hatchery boards cannot influence other than putting the hatchery fish in the water and working with the Board of Fish and Department to provide time and area is having the troll fleet target the hatchery fish. There are substantial amount of king and coho salmon that are produced by the associations that end up being cleaned up in THA by the gillnet and seine fleet which further exacerbates the situation. There are many trollers that will not participate in the hatchery spring king salmon fisheries because they are hatchery fish, or don't fish the chum salmon peaks because they are occurring at the same time as the summer king salmon opening. It might be that the troll allocation percentages were not set at an appropriate level but the RPT and hatchery associations have always tried to provide fish, time and area which is all they can do.

Proposal #177 & duplicate proposal #178: Support. SEAFA supports this proposal submitted by NSRAA to close a small portion of the Mist Cove SHA in order to protect the floats, barrier nets, net pens and provide safety to the NSRAA staff.

Proposal #179 and duplicate proposal #180: Support SEAFA supports this proposal submitted by NSRAA to close a small portion of Kasnyku Bay SHA to protect coho, chinook, and chum salmon broodstock to commercial fishing.

Proposal #181: Support: SEAFA supports this ADF&G housekeeping proposal to formally codify the Neck Lake SHA.

Proposal #184: SEAFA supports this SSRAA generated proposal to allow troll of chum salmon to occur in the Kendrick Bay THA June 15 to September 30 and allow the Department to close trolling if necessary by EO during this time period. This would provide an opportunity for trolling

concurrently with seine openings.

Proposal #188: Oppose. SEAFA opposes this proposal and the strategy behind it. Allowing one of the net gear groups to fish periodically through the week allows the darker chum salmon to be kept cleaned out of the area and better quality fish to be sold into the marketplace by all gear groups.

Proposal #189: Support. SEAFA supports this proposal submitted by the Department to remove an incorrect reference to the *Northern Southeast* seine *salmon fishery management plan.*

Proposal #192: No Action. SEAFA supports the Board taking no action on this proposal as it is already required that all salmon taken for personal use during commercial fishing operations (regardless of gear type) to be recorded on a fish ticket.

Proposal #193: Oppose. SEAFA opposes this proposal that closes the seine fishery and takes away management flexibility by the department. The reports provided by the department for this meeting and in particular *Northern Chatham Strait sockeye salmon: 2014 updated stock status, fishery management, and subsistence fisheries. (by Bednarski, J., D. K. Harris, and S. C. Heinl. 2014)* provides the information and background for a determination that purse seine fishing in District 12 as managed by ADF&G provides adequate protection of the salmon to provide for the customary and traditional amounts of salmon. There is no apparent correlation between the amount of escapement and harvest combined and the time, effort and harvest of salmon in district 12 by the seine fleet.

A similar proposal was brought forth in 2009 (Proposal #262) and staff comments at the time stated, the Department was "*neutral on the allocative aspects of this proposal*". But did state "*The department has for many years implemented effective conservation measures to protect sockeye salmon stocks in Chatham Strait that are important to subsistence users." "These measures include closing waters in the approaches to the terminal areas of Kook and Kanalku lakes and structuring fishery openings so that local Chatham Strait stocks are provided adequate time, free of commercial exploitation, to reach the terminal areas. . . . The Chatham Strait sockeye salmon issue appears to be a socioeconomic rather than resource competition issue. Local Chatham Strait sockeye salmon stocks are small with inherently limited productivity. Recent increased subsistence harvest demands have been placed on these stocks that do not appear to be sustainable when directed at only one particular stock (i.e.*

Kanalku Lake). However, these harvest demands may very well be sustainable if the harvest is spread over several stocks.[1]"

SEAFA believes that this is still true today and that it is still appropriate for ADFG to manage the seine fishery by Emergency Order. This management provides flexibility to react to in-season changes and abundance of all species, monitoring stream & escapements.

The Northern Southeast seine salmon fishery management plan is an allocation plan between gillnet and seine fleets for north bound sockeye salmon.

Proposal #194 & 195: Oppose. SEAFA opposes closing a portion of Lisianski Inlet to commercial fishing. We support the department having the flexibility to manage by EO authority based on what they are viewing in season for escapement, subsistence priorities and on run strength.

Proposal #198 & 201: Support. SEAFA supports the department proposal to codify the areas around sockeye streams in the Angoon that have been closed by EO authority for over 10 years to provide for a subsistence priority.

Proposal #199, & 201: Oppose. SEAFA opposes this proposal to close the seine fishery. See comments above on proposal #193.

Proposal #203: Oppose. SEAFA does not believe that the maximum speed at which a purse seine can be towed is the appropriate way to regulate seine gear if the issue is the new nets being fished. See staff comments.

Proposal #204 & 205: Oppose. The use of spotter planes has historically been used in the fishery and their use does not create a conservation issue.

Proposal #206: Support. SEAFA supports this ADF&G housekeeping proposal.

Proposal #208: Oppose as written. SEAFA opposes the proposal as written for a maximum mesh size of 6" when there is no directed king fishing in District 8. A maximum mesh size is problematic with gillnet web as the web permanently stretches as it is soaked in water and fished. So although the

[1] 2009 staff comments RC 2 http://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.pastmeetinginfo

fisherman buys a net they expect to be legal, often it is not legal after it has been fished. That said, SEAFA does not oppose the Department having the management tool in District 8 to require maximum 6" web when necessary to protect escapement.

Proposal #209: Oppose. SEAFA opposes this proposal to use deeper nets with a maximum mesh size of 4-7/8 inches. See comments on Proposal #208 about maximum size nets. If looking to increase pink salmon harvest in the gillnet fishery, single filament web would be a more effective tool. When we queried are members about this proposal we had many oppose the proposal and almost no support for the deeper nets.

Proposal #210: Support. SEAFA supports this proposal to allow single-filament web. When our members were queried, only one fisherman reported back to the office that they oppose this proposal. Many fishermen appreciated having the choice but weren't sure if they would buy a single-filament net or not. The benefits are the cost of buying the cheaper single-filament web compared to the cost of 6 strand or multi-strand gillnet web.

In 1987, the department evaluated 4 different types of gillnet web[2] including the six strand gear that became legal in 1988. In this report[2] it states, *"No difference was found between the recently legalized six-strand monofilament nylon gear and mono-twist with center-core used commercially for the past several years. The six-strand gear did appear to be twice as efficient as the multi-filament in clear water (as represented by the Sumner Strait results figure 6) but our results were inconclusive, probably due to low catch rates and small sample sizes."* They go on to state that the gillnet coho catch is used as an indicator and has treaty implications, the same as the staff comments in RC2 this year but the gillnet study states, "*The results indicate that the six-strand gear may be more efficient than the older multi-filament gear for coho salmon in clear water fisheries. In order to address this problem additional study is planned in Sumner Strait, which will focus on the two gear types, multi-filament and six-strand, to hopefully provide a more precise estimate of relative efficiency by increasing the sample sizes."* The six-strand gear is a legal gear where the more inefficient center core gear is now no longer legal. The department adjusted to these

[2] Alexandersdottir, M., Muir, J., and Lynch, B. *Gillnet Gear Evaluation Study in Southeast Alaska, 1987* Alaska Department of Fish and Game, Commercial Fisheries Division, Juneau, Alaska, Sept. 1988 Regional Information Report No. 1J88-19 http://www.sf.adfg.state.ak.us/FedAidPDFs/RIR.1J.1988.19.pdf

gear changes without effects on the fishery. **SEAFA supports the following three additional criteria for passage of this proposal: 1.) the gear does not become legal until January 1, 2016; 2.) fisherman fishing with single-filament gear be required to register with the Department in the district they are fishing so that the managers can know the number of fisherman in the district using mono, the amount of mono in the net so they department could when looking at CPUE data over the short term determine if the boats fishing mono have significantly different catch rates; and 3.) a sunset date in three years so that fishermen and department can report back to the Board about the use of mono (i.e. did the department change the amount of time fished in any district because of increased catch rates with the use of mono).**

Proposal #211: Support. SEAFA supports this Yakutat Advisory Committee proposal to remove the sunset clause for the set gillnet permit stacking regulation.

Proposal #212: Support. SEAFA supports this Yakutat Advisory Committee proposal to allow the owner of two commercial set gillnet permits to fish both permits throughout the Yakutat region.

Proposal #213: Support. SEAFA supports this Yakutat Advisory Committee proposal to allow the historical practice of allowing set net fishermen to co-op their fish by splitting on the fish tickets the number of fish by permit holder upon an agreed upon settlement rather than trying to assign one net and keeping the fish separate from that net with other nets.

Proposal #214: Oppose. SEAFA opposes this proposal for deeper nets while there is a management concern for Chinook salmon but supports the department having the management authority to allow deeper nets when appropriate and there are no management concerns.

Proposal #215: Support. SEAFA supports this proposal to allow 60 mesh deep nets in Yakutat Bay after July 1st.

Proposal #216: Support. SEAFA supports this proposal to change the day of the week that gear on the East River switches from one to two 20 fathom gillnets.

Proposal #217: Oppose. SEAFA opposes this proposal to establish and opening date in regulation for the Tsiu as it takes away department flexibility to respond to in-season information.

Proposal #218: Support. SEAFA supports this ADF&G housekeeping proposal to bring clarity to the closed waters of the Lost River due to physical changes to the river landscape.

Proposal #219: No Position. SEAFA would highlight part of the issue raised in this proposal regarding using the Anadromous Waters Catalog for determination of streams for protection by the 500 yard closure.

Proposal #222: Support. SEAFA supports this ADF&G proposal to clarify that it is Alaska hatchery salmon that counts towards the 20% necessary for a spring troll fishery not any hatchery fish.

Proposal #223: Oppose. SEAFA opposes this proposal to change the allocation between the two summer king salmon openings.

Proposal #225: Support. SEAFA supports extending the sunset date for an additional three years for the District 12 and District 14 Enhanced Chum Salmon Troll Fisheries Management Plan but also believes it is very important for ADF&G to gather additional data on this fishery to make sure that harvest of out-migrating smolt being caught on the smaller chum salmon hooks is not causing the declines in the Chilkat and Taku chinook returns.

Proposal #226, 227 & 229: Oppose. SEAFA does not at this time support this as a permanent or expanded fishery until more is known about the interaction of the small chum salmon hooks on out-migrating Chinook salmon.

Proposal #228: Oppose. SEAFA opposes a mandatory 10 day closure for coho at the beginning of August. This takes away the departments flexibility to manage all fisheries while protecting the resource first.

Proposal #231: Oppose. SEAFA opposes an increased closure for trolling in the waters of Naha Bay. This is the same proponents for creating a marine reserve in Proposal #113. They just don't want anyone in the area.

Proposal #232: Support. SEAFA supports the Departments proposal to clarify the definition of power troll gear.

Thank you for considering our comments on these proposals. We will be at the meeting and can provide more information during the Board of Fish public process or please contact us if we can provide any additional information.

Sincerely,

Kathy Hansen
Executive Director

To: Board of Fish
From: Matthew Donohoe
Po. Box 3114
Sitka, Ak. 99835

2/4/15

Members of the Board of Fisheries, I have been a sports and commercial fisherman and an Alaska resident since the 1970's. I am writing you today in support of several proposals and to oppose a few. There are four pages. First the support.

Proposal 229 Support
I support this proposal and not just because I wrote it. As you probably know by now commercial salmon trollers are significantly behind in their Board of Fish mandated share of Southeast Alaska's hatchery salmon. This imbalance has been going on for many years. Part of the reason for this is the very success of Alaska's non-profit hatchery programs, the International Salmon Treaty, and changes in the market place.

The salmon treaty, in effect, limits how many Alaska hatchery kings trollers can take. Alaska's Department of Fish and Game, because of treaty restraints, places caps on how many treaty fish trollers are allowed to catch during specially designed hatchery access openings. When a cap is reached the effected area is closed. This is particularly limiting in years of high salmon abundance when the ratio of treaty fish to Alaska hatchery fish is greater. In recent years the combined take of Alaska hatchery king salmon by commercial net fishermen has significantly exceeded the troll harvest. This situation was not, I think, anticipated by planners of our hatchery operations. They didn't understand how politics in the Pacific Northwest would trump science and treaty language promising fair access for Alaska to whatever success treaty mandated rebuilding programs would produce. The International Salmon Treaty is anything but fair to Alaska and the reality is that it limits harvest even on hatchery fish paid for by Alaska trollers.

Trollers responding to the reality on the ground have developed effective techniques for harvesting some of the highly successful Alaska hatchery chum production. Troll harvest of chum salmon, however, was not part of the planning by designers of Alaska Hatchery programs. Today there are

already significant "turf wars" over access to hatchery chums without throwing trollers into the mix. Proposal 229 concerns a small area that would not cause commercial gear group conflicts. It has been vetted with Territorial Sportsmen in Juneau and although I can't speak for them they don't seem hostile to the idea. At their request the proposed area doesn't include the shallows off Pt. Couverden (see chart). The proposed area connects two previous existing troll areas and allows more practical troll access to the Northern Chatham troll area by eliminating a small closed section between Homeshore and Northern Chatham.

Proposal 227 Support
I support this proposal because of the above.

Proposal 226 Support
I support this proposal. Ibid

Proposal 224 Support
I support this proposal. Alaska is already being screwed by the salmon treaty. In years when the Treaty mandated troll quota is low (especially in years like 2013 when the deeply flawed treaty process erroneously under predicted a king salmon run by an order of magnitude) it is difficult for ADF&G to manage small remnants of quota in areas the size of Southeast Alaska with a fleet of potentially 1000 boats. It has been the practice of the Department to leave anything less that 10,000 fish (or so) on the table rather than open the fishery and risk going over the quota. This is detrimental to Southeast Alaska's economy and in years of low quota even more so because the price of king salmon is high.

Proposal 159 Support
I support this proposal

The following are proposals I oppose

Proposal 113 Oppose

Proposal 174 Oppose
This second guesses the science based escapement goal of the Department. No data is given for what the actual number of king salmon caught by commercial trollers is in the effected area especially in years of low predictions. Those numbers are available. Does accurate data exist on catch as well as hook and release by the sports industry in the area? Unlike sports harvesters commercial trollers release no legal sized king salmon during the hatchery fisheries. Unlike the sports industry there is hard data in the form of fish tickets for every encounter of legal sized king salmon in the commercial fishery at this time of year.

Proposal 175 Oppose
Why on God's Green Earth would we want to open a can of worms like a BOF mandated Task Force to potentially enable a fish grab by one commercial fleet from another segment of the industry?

Proposal 220 Oppose
This is a fish grab pure and simple. Yakutat is currently the second best place to catch winter kings in the region. The Board already moved the Yakutat winter line out once. The existing winter line is westward of Ocean Cape by several miles. Why is Yakutat different in this aspect than any other area? We would all like to move our winter troll lines out. I would love to fish five miles westward of Kruzof Island. There would be more justification for moving the winter line in the Craig area from Cape Bartolome to Cape Lookout than five miles West of Ocean Cape. At least a Bartolome/Lookout line would be "point to point" and fishermen in the Craig area have a much lower winter catch rate than Yakutat. Why not ignore our Treaty obligations? We could just eliminate the summer catch and get them all in the winter.

Proposal 228 Oppose
Good Grief! Let's ignore science based management and mandate a pointless and debilitating closure on the troll fleet after historic record escapement of Coho in Southeast Alaska. Why not tie the Departments hands and say, "No matter what kind of record run there is we're going to

have an automatic ten day closure at the peak of it". This proposal doesn't seem to care if the troll fishery is even catching any Angoon area bound fish.

Proposal 230 Oppose
This proposal pretends that troll efficiency is somewhere in the ballpark of gillnetting and that trollers could in any way compete with gillnetting production on an hour to hour basis or even fish around a gillnet fleet. Hogwash. By the way what's the percentage of wild fish in the Lynn Canal chum gillnet fishery? As to "anecdotal evidence" in this case it's just another phrase for "self generated" rumor. I've trolled in Icy Straights for Chums three years in a row, however not in the last two seasons, and have hooked fewer than 10 sublegal kings a year. That's while fishing every day for at least three weeks. I have "anecdotal evidence" that there's thousands of twelve inch king salmon killed in the gillnet sockeye fishery. Let's not base our arguments on "anecdotal evidence".

Proposal 231 Oppose (I think)
There is no description in the proposal of where the line would be. Where, for instance, on the shore of Revillagigedo Island would the line come to? Where on Cache Island would it start? Is there any data to support this proposal?

That's about it for now.
Thanks for your consideration.

Matt Donohoe