tim mcdonald (907) 224-8054 p.1

RC #5

Attn: Shannon
Late Public Comments

Letter to board of Fish
Re: proposal # 21

From: Tim McDonald interested citizen , Seward, AK

Dear Ladies & Gentlmen of the Board of Fish,
I do support single hook fishing in the resurrection river estuary, the run is enhanced by smolt release and we are one of the most accesable fishing spots in Alaska. My business happens to be located next to the said estuary and I provide parking and other services to the fishermen. The red salmon run commenced on May 3rd and ended by approx june 7th of this year as far as fish entering the stream and river system, am sure they stayed in the system some time after that. Perhaps at a later time the dates for an open single hook fishery can be modified to more closely follow the season. Thank you for the opportunity to be heard.

Regards,
Tim McDonald

Tim McDonald

10-30-07

BOF

Attn: Sherry Wright
Southcentral Comm. Coordinator

RC 6

Southeast Alaska Fishermen's Alliance
9369 North Douglas Highway
Juneau, AK 99801
Phone 907-586-6652
Fax 907-523-1168 Website: http://www.seafa.org E-mail: seafa@gci.net

November 5, 2007

RECEIVED
NOV 0 5 2007
BOARDS

Alaska Department of Fish and Game
Boards Support Section
Board of Fish, Mel Morris, Chair
PO Box 25526
Juneau, AK 99802-5526

RE: Oppose all 7 Board Generated Proposals from Oct. Worksession based on process.

Southeast Alaska Fishermen's Alliance (SEAFA) opposes all 7 board generated proposals developed at the October worksession. It is unacceptable to state that the Board of fish process is a fair and open process, that allows for advisory committee participation when proposals are generated at a worksession on October 9-11 and is scheduled for action on Nov 13 with the comment deadline being October 26th. This does not allow for public or advisory committee participation. Any proposal that is not published in the proposal book and submitted by the April deadline and considered at the fall worksession should be judged by the agenda change request (ACR) criteria. In the past, board generated proposals were either submitted by the April deadline (preferred method), or submitted as an ACR and accepted using the criteria for an ACR and scheduled for the March board meeting to allow for public notification and advisory committee participation. This years board generated proposal process is unacceptable. We would also question why the board generated a proposal that appears to be a clear case of allocating within a fishery with the Chignik court case decision and HB 188 not moving through the legislature.

We are not necessarily opposed to the merits of the individual proposals and in fact would fully support one of the proposals when introduced correctly with full public participation.

Sincerely,

Kathy Hansen
Executive Director

CC: Cora Crome, Office of the Governor
Denby Lloyd, Commissioner of Fish and Game

RC7

RECEIVED
OCT 29 2007
BOARDS

October 23, 2007

ATTN: Board of Fish Comments
Alaska Dept of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Lower Cook Inlet Finfish Proposals-Oct/Nov 2007

Dear Board Members:

I have been fishing the Anchor River continuously since 1968. I would like to comment on the following proposals:

Proposal 1: "Open Anchor River king salmon fishery for 6 days per week."
Proposal 2: "Open Anchor River king salmon fishery for 5 days per week."

The current system is working fine. I believe opening the river for more days is unnecessary and will cause habitat degradation thus reducing salmon stocks in future years. I also believe there is not enough data available at this time to support these proposals.

Therefore I am opposed to Proposal 1 and Proposal 2.

Proposal 3: "Go back to opening the Anchor River on the Memorial Day weekend and continuing for 4 weekends instead of opening the weekend before Memorial Day."

This proposal could have an effect on the stocks if the water level happens to be low at this time of year. Therefore I propose staying with the early weekend and giving the area biologists the ability to open the river for the sixth weekend, if the escapement is adequate and the river has enough water flowing so as not to restrict the movement of spawners migrating up river.

Proposal 4: "Increase the limit for Anchor River and Deep Creek king salmon to 5."
Proposal 5: "Allow catch and release fishing after retaining a king salmon on the Anchor River and Deep Creek."

These proposals are both unnecessary and will damage the resource due to additional fish being taken and catch and release should only be practiced before taking your limit. The current system is working as shown in the escapement counts therefore no changes are necessary at this time.

Proposal 6, 7, 8, and 9: All proposals to reduce saltwater conservation at the mouths of Deep Creek and the Anchor River."

I am opposed to any changes to the reduction of the conservation or no fishing zones at the mouths of Deep Creek or the Anchor River. These zones have allowed a sanctuary area for king salmon and have resulted in healthy and sustainable runs of kings in these streams. In addition there are plenty of areas of open fishing to allow for trolling of king salmon without affecting the runs.

In closing, I'd like to comment on the great job the Alaska Fish and Game has done in managing our salmon fishery in Lower Cook Inlet.

Sincerely,

Robert L Ditton

Robert L. Ditton
PO Box 601
Homer, AK 99603

Board of Fish Comments
Page 2 of 2

Customary and Traditional Uses: Shellfish, Cook Inlet Area

Prepared for
Alaska Board of Fisheries
November 2007 **RC 8**

Proposal 392

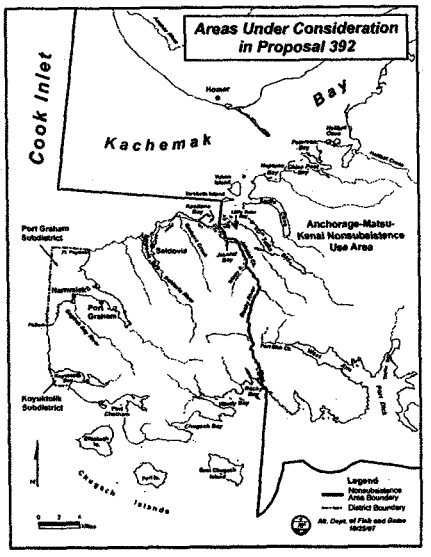
5 AAC 02.311 Customary and Traditional Uses of Shellfish Stocks. Lower Cook Inlet area.

5 AAC 02.310 Subsistence Shellfish Fishery. (harvest regulations)

Department Recommendation: Neutral

The board first reviews information on C&T uses of shellfish and determines if changes to the current finding are warranted before providing subsistence harvest regulations.

2



3

Current State Regulations Shellfish in the Cook Inlet Area

- Positive C&T finding for clams in the Port Graham Subdistrict.
- Clams may be harvested in the Port Graham Subdistrict. No size or possession limits.
- Other subsistence shellfish harvests prohibited.
- Noncommercial harvest opportunities for all shellfish provided by personal use and sport regulations. A sport fishing license is required.

4

State Subsistence Procedures

Board findings on shellfish in the Cook Inlet Area.

- Is there Customary and Traditional Use of shellfish in the Cook Inlet Area?
  - Yes, a positive finding was made for clams in the Port Graham Subdistrict in 1982.
- Is there a "Harvestable Surplus" of shellfish in the Cook Inlet Area?
  - Yes, based on biological information, for all stocks except shrimp, Dungeness crab, Tanner crab, and king crab.
- What is the Amount reasonably Necessary for Subsistence uses (ANS)?
  - No finding has been made; this is a board determination.
- Does the harvestable surplus allow for all or only some uses?
  - This is a board determination.

5

C&T Harvest and Use Patterns

Criterion 1. Long-term, consistent pattern of use.

- Shellfish have been harvested for food by people living in lower Cook Inlet communities since long before historic contact up to the present.
- From the early 1980s to 2003, harvests and uses by residents of the local communities of Nanwalek, Port Graham, and Seldovia (total estimated population 743 in 2006) have been documented through systematic household surveys.
- Residents of other Alaska communities also harvest and use shellfish from this area.

6

Criterion 1, continued

- At least 19 kinds of marine invertebrates are known to be harvested or used by Nanwalek, Port Graham, and Seldovia residents, 1980 – 2003 (Table 1 in RC 4, Tab 4).
- In all study years (except years just after the *Exxon Valdez* oil spill), a large majority of households in all three communities used and harvested shellfish (Table 2, Fig. 2, Fig. 3, RC 4).
- There is harvest and use information for each type of marine invertebrate for the 3 communities, based on household surveys (Tables 3 through 22, RC 4, Tab 4).
- Crab are among a large group of bottom-dwelling species called *uyangtaaq* in the local Alutiiq language, found in shallow bays and intertidal areas, including lower Cook Inlet.

7

Table 2. Harvest and uses of marine invertebrates in Nanwalek, Port Graham, and Seldovia

Community	Study year	Percentage of Households					Total pounds	Average pounds per HH	Per capita pounds	95% CI (± %)
		used	trying	harvesting	receving	giving				
Nanwalek	1987	97	91	91	82	76	2,811	70.3	18.6	14
Nanwalek	1989	91	88	88	67	76	2,507	61.2	16.0	15
Nanwalek	1990	97	91	91	80	69	3,074	75.0	16.7	14
Nanwalek	1991	100	90	90	79	69	3,929	95.8	24.4	37
Nanwalek	1992	100	91	91	88	88	4,232	103.2	24.8	17
Nanwalek	1993	100	97	97	91	91	3,296	89.1	23.3	17
Nanwalek	1997	83	79	79	55	72	1,512	39.8	9.0	23
Nanwalek	2003	100	100	100	95	91	3,579	70.2	15.4	68
Port Graham	1987	98	87	87	80	43	3,010	47.8	16.7	13
Port Graham	1989	71	67	65	46	48	1,385	22.7	8.6	16
Port Graham	1990	98	87	87	83	65	2,380	43.3	14.5	11
Port Graham	1991	96	80	80	90	69	3,475	59.9	21.6	16
Port Graham	1992	100	90	90	96	79	3,986	68.7	23.9	13
Port Graham	1993	100	82	80	92	73	2,786	45.7	16.0	17
Port Graham	1997	86	75	75	61	57	1,994	31.7	12.8	22
Port Graham	2003	89	74	74	79	72	1,875	28.8	12.0	21
Seldovia	1991	86	68	68	74	44	10,371	89.4	30.4	35
Seldovia	1992	89	74	74	71	51	6,673	48.7	17.8	33
Seldovia	1993	91	79	79	71	63	14,627	95.6	34.0	33

8

Figure 2. Percentage of Households Participating in Shellfish Harvesting, Nanwalek, Port Graham, and Seldovia

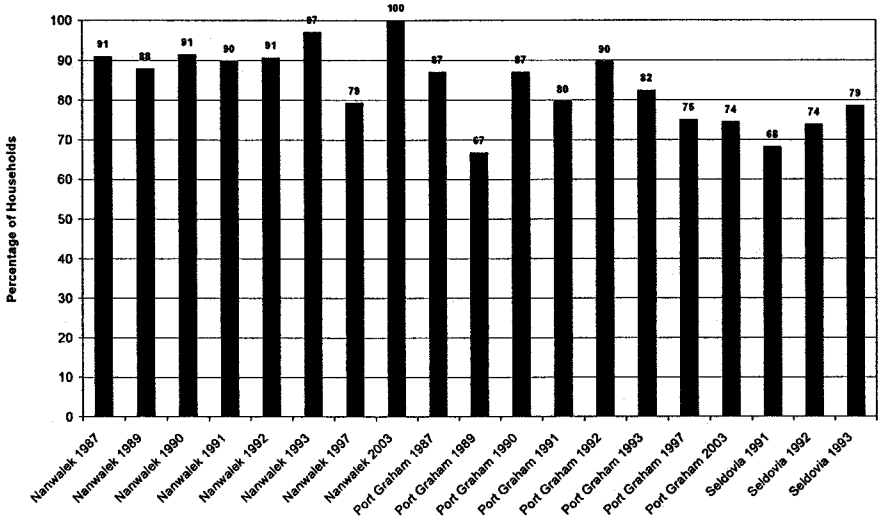
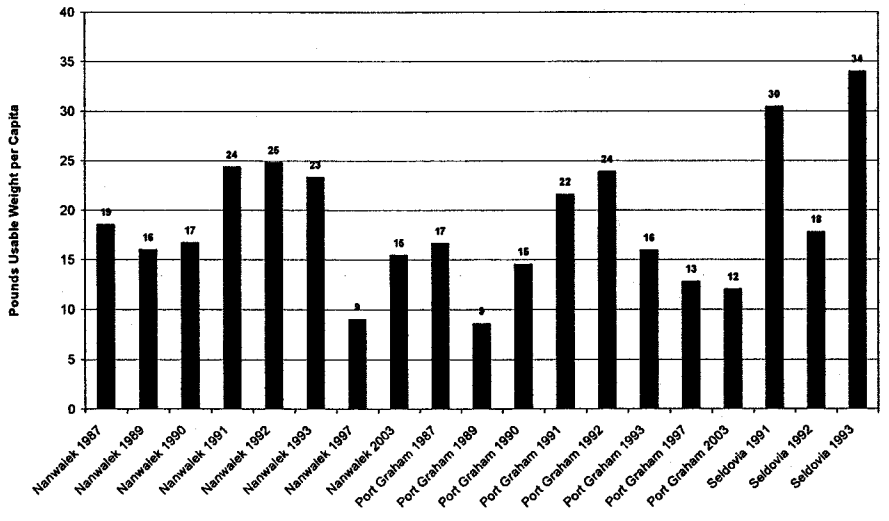


Figure 3. Estimated Harvests of Shellfish in Pounds Usable Weight per Capita, Nanwalek, Port Graham, and Seldovia



C&T Harvest and Use Patterns

Criterion 2. A use pattern recurring in specific seasons of each year.

- Marine invertebrate harvests occur throughout the year.
- Extreme low tides in spring are particularly important to access intertidal habitats of mussels, clams, limpets, chitons, cockles, snails, and octopus.

11

C&T Harvest and Use Patterns

Criterion 3. Methods and means of harvest characterized by efficiency and economy of effort and cost.

- Traditionally, marine invertebrates were gathered by hand or with small, hand-held tools such as knives, sticks, spears, hooks, and shovels.
- Since the mid-20th century, pots set for crab and shrimp.
- Access to harvest areas is on foot or by small skiffs.

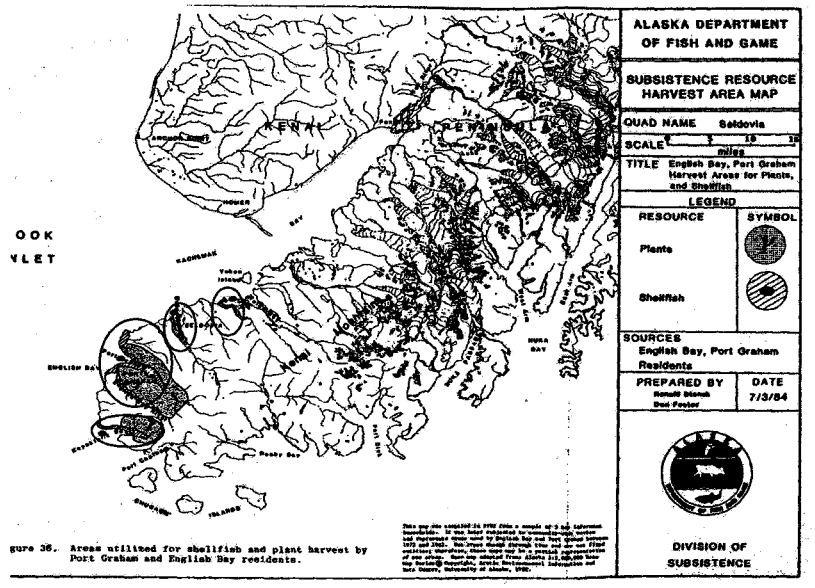
12

C&T Harvest and Use Patterns

Criterion 4. The area in which the pattern of use has been established.

- For local community residents, most harvest areas within easy reach of community, accessed on foot or by small boat. A road connects Seldovia with Jacolof and Kasitsna bay harvest areas.
- Most frequently used areas include Jacolof, Kasitsna, Seldovia, Port Graham, and Koyuktolik bays, and beaches within the Port Graham Subdistrict (Fig. 4).
- Other areas used in the past include Port Chatham, Chugach Bay, Windy Bay, and Rocky Bay.

13



gure 36. Areas utilized for shellfish and plant harvest by Port Graham and English Bay residents.

C&T Harvest and Use Patterns

Criterion 5. Means of handling, preserving, and storing game that have been traditionally used by past generations, but not excluding recent technological advances.

- Historically, marine invertebrates were stored in seal oil for later use.
- Currently, most shellfish are consumed soon after harvest, in chowders, sauces, fried, boiled, or other dishes.
- Clams, crab, or chitons, are typically frozen when harvested in large amounts.

15

C&T Harvest and Use Patterns

Criterion 6. The handing down of knowledge of hunting skills, values, and lore from generation to generation.

- Shellfish harvesting is a highly social activity in local communities and involves people of all ages, male and female.
- Harvesting creates a social context in which young people learn harvest methods, values, and traditions, from older generations.

16

C&T Harvest and Use Patterns

Criterion 7. The harvest effort or the products of that harvest are distributed or shared.

- Marine invertebrates are widely shared within and between local Cook Inlet communities.
- In most study years, 70% or more of households in Nanwalek, Port Graham, and Seldovia received shellfish and over half shared shellfish harvests with other households (Table 2, in RC 4, Tab 4).
- Some resources, such as crab, traditionally were taken by a relatively small number of harvesters and then widely shared, resulting in a high percentage of households using the resource.

17

C&T Harvest and Use Patterns

Criterion 8. A pattern that includes the taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources.

- Marine invertebrates are one of several groups of resources harvested and used by local Cook Inlet communities in the 1980s, 1990s, and early 2000s.
- Overall harvests for home use in Nanwalek, Port Graham, and Seldovia are relatively high, ranging from about 200 to 400 lbs per person per year over this time period (Table 23, RC 4, Tab 4).
- Harvests and uses are diverse. In 2003, the average household in Nanwalek used 25 kinds of wild foods and Port Graham households used an average of 18. In 1993-94, the average household in Seldovia used 13 kinds of wild foods.

18

Table 23. Uses and Harvests of Wild Resources, Nanwalek, Port Graham, and Seldovia

Community	Year	Percentage of Households					Usable Lbs Harvested	
		using	trying	harvesting	receiving	giving	Per Household	Per Capita
Nanwalek	1987	97	94	94	94	94	1,078	285
Nanwalek	1989	100	100	100	100	94	538	141
Nanwalek	1990	100	100	100	100	97	813	181
Nanwalek	1991	100	100	100	100	100	1,017	259
Nanwalek	1992	100	100	100	100	94	1,160	279
Nanwalek	1993	100	100	100	100	97	1,164	305
Nanwalek	1997	100	100	100	100	90	1,121	254
Nanwalek	2003	100	100	100	100	100	1,787	393
Port Graham	1987	100	100	100	98	82	657	229
Port Graham	1989	96	94	94	92	65	323	122
Port Graham	1990	100	100	100	98	89	637	214
Port Graham	1991	100	96	96	98	88	780	281
Port Graham	1992	100	100	100	100	98	784	273
Port Graham	1993	100	98	98	100	90	608	212
Port Graham	1997	100	98	98	96	86	628	253
Port Graham	2003	98	96	96	98	94	1,121	466
Seldovia	1991	99	92	92	96	85	604	205
Seldovia	1992	99	94	94	95	85	397	145
Seldovia	1993	95	95	95	86	79	517	184

19

Proposal 392

Summary:

- This proposal revises 5 AAC 02.311, Customary and Traditional Uses of Shellfish Stocks, and 5 AAC 02.310 Subsistence Shellfish Fishery (harvest regulations), for areas outside the nonsubsistence area in the Lower Cook Inlet Area.

Department Recommendation: Neutral

Make a C&T finding for shellfish before any changes to harvest regulations.

20

RC 9

TOUR FISHING COMMITTEE REPORT

The Board of Fisheries committee on tour fishing (John Jensen, Larry Edfelt) met in Juneau with department staff and Dept. Public Safety on October 31, 2007. Present in person or by teleconference were Jensen, Edfelt, Mel Morris, Jim Marcotte, Rob Bentz, Patti Nelson, Kerri Tonkin, Scott Walker, Craig Farrington, Sara Larsen, and Capt. Al Cain from DPS.

Scott Walker reviewed a written report he submitted, which summarized department concerns and questions about tour fishing and related fisheries. The report is attached.

The staff pointed out that there were several new types of fishing activities that could be construed as "commercial", yet were permitted under the commissioner's authority to issue permits for scientific, educational, propagative, or exhibition purposes. These included "tour fishing" (mostly in the Ketchikan area, although expected to expand to other southeast communities that are visited by cruise ships), aquarium fishing, and snorkeling tour operations.

All of these involve handling of invertebrates, some small scale, some large scale, with potential handling mortality and other impacts, particularly for shellfish in summer. Enforcement is difficult for any of these fisheries as to maintaining permit limits and species.

As set out in Walker's report, the department staff also felt uncomfortable issuing permits for crab or other species which were already fully allocated within existing subsistence, sport, commercial, and personal use fisheries.

Tour fishing was divided into two concerns: operation in the Annette Island Reserve, and operations everywhere else. It is unknown what, if anything, can be done with respect to the Annette Island Reserve, except if fishing takes place in state waters to stock pots in the reserve for later pulling by the tour vessel. If additional vessels enter this fishery in the Annette Reserve, resource impacts could be substantial.

There are several potential allocation concerns and several issues of potential shellfish mortality from handling if tour fishing grows. Much of the tour fishing takes place in waters closed to commercial fishing, or for

species already fully allocated in existing fisheries, or during critical times post-mating and molting.

The committee agreed that the allocative aspects should be addressed by the board, with the tour operator submitting a proposal to the board that could be evaluated within the board's existing allocation criteria in order to obtain a slice of the resource.

The department will recommend to the commissioner that permits not be issued for species covered by limited entry permits. The department will draft a letter to the tour operators explaining the need for a proposal to the board for allocation of already fully utilized resources. The proposal deadline will be included in the letter along with forms.

The department would continue to permit aquaria for the time being, limiting their take to species not fully allocated in existing fisheries.

The committee agreed to meet again within two months, after the commissioner's views are known with respect to the recommendations herein.

Submitted by:
Larry Edfelt
Committee Chair

Note: The October issue of National Fisherman has a cover story about the Bering Sea crabber Aleutian Ballad that has been re-rigged for tour fishing, and is operating in Ketchikan. A copy is attached.

TOUR FISHING

Eco-Tourism BOF Subcommittee

October 31, 2007 9:00am

Content:

REGULATIONS CURRENTLY IN PLACE

16.05.920. Prohibited conduct generally. (page 60 in Lexis)

(a) Unless permitted by AS 16.05 - AS 16.40, by AS 41.14, or by regulation adopted under AS 16.05 - AS 16.40 or AS 41.14, a person may not take, possess, transport, sell, offer to sell, purchase, or offer to purchase fish, game, or marine aquatic plants, or any part of fish, game, or aquatic plants, or a nest or egg of fish or game.

16.05.930. Exempted activities. (page 61 in Lexis)

(a) This chapter does not prevent the collection or exportation of fish and game, a part of fish or game or a nest or egg of a bird for scientific or educational purposes, or for propagation or exhibition purposes under a permit that **the department may issue and prescribe the terms** thereof.

5 AAC 41.005. Permit required (page 621 in Lexis)

(a) No person may transport, possess, export from the state, or release into the waters of the state, any live fish unless the person holds a fish transport permit issued by the commissioner or his authorized designee, and the person is in compliance with all conditions of the permit and the provisions of this chapter. A fish transport permit will be issued for a fixed term subject to the provisions of (c) of this section. (this section continues on until 5 AAC41.060)

CURRENT DEPARTMENT POLICY

1 Permits are required for all collections of fish, shellfish, and aquatic plants not covered by existing regulations.
2 This requirement includes methods and means (gear), numbers, locations, seasons, or the possession and/or transportation of live fish in any life-stage outside of existing sport, Personal Use, aquatic farm, and commercial regulations.
3 Fishery Resource Permits will be issued only to those organizations and individuals who meet the departmental requirements specified in this policy, and who are engaged in scientific, educational, propagative, or exhibition activities.
4 Permits are issued on a yearly basis
5 Renewal is based on past performance and any new information
6 Denial may occur if it is determined if permit will adversely affect the continuen health and perpetuation of wild fish, shellfish, aquatic plants, or their habitat, or disrupt traditional common property fisheries.

THREE TYPES OF PERMITS HAVE BEEN DEFINED:

1 Collection - either 'Scientific' or 'Educational' and applicants must be involved in legitimate research or educational activities
2 Holding (aquaria) – applicants must be involved in in legitimate research or educational activities
3 Propagation – a permit in this category allows fish culture activities.

DEFINITIONS:

1 Scientific - pertaining to legitimate research; conforming to recognized scientific principles or recognized rules and standards which benefit the state or department.
2 Educational - pertaining to legitimate educational activities; no definition available.
3 Propagative - the breeding and reproduction of fish, shellfish, or aquatic plants for the purpose of achieving scientific, educational, or vocational objectives.

DEPARTMENT CONCERNS and QUESTIONS:

1 Allocation concerns. Can ADFG allow a permit holder to "take" part of a resource where the commercial use is already allocated to a limited entry fishery?
2 DOES ADFG want to allow for a "take and show" commercial use permit.
3 CAN ADFG allow "take and show" operators to set pots and longlines in State Waters?
4 Enforceable concerns. Special marking on support vessel like Maine? Onboard observers?
5 Mortalities of aquarium and pot held animals. What are acceptable limits?
6 Mortalities of "viewed animals". Should ADFG allow handling of animals?
7 Localized area depletions. Does ADFG need rules to spread out operators?
8 What regulations are made by the BOF and what regulations can ADFG create under a Commissioners Permit?
9 If more than one applicant wants to use a resource how are allocations made?
10 Does ADFG want to allow a transport permit for a "take and show" fisher that operates in Annette Island waters but may be conducting activities that the state does not deem as appropriate.
11 Should there be a grandfather clause for operations that would be denied under new permit regulations?

RELATED REGULATIONS IN ALASKA

Regulations for Game:

5 AAC 92.033. Permit for scientific, educational, propagative, or public safety purposes

Notwithstanding restrictions in 5 AAC 78 - 5 AAC 88, the department may issue a permit for the taking, possessing, importing, or exporting of game for scientific, educational, propagative, or public safety purposes.

5 AAC 92.034. Permit to take game for cultural purposes

The commissioner may issue a permit for the taking of game for the teaching and preservation of historic or traditional Alaskan cultural practices, knowledge, and values, only under the terms of a permit issued by the department upon application. A permit may not be issued if the taking of the game can be reasonably accommodated under existing regulations. For purposes of this section, "game" includes

EXAMPLE OF WHAT ANOTHER STATED DOES.
THE STATE OF MAINE.

Maine has a fishery demonstration license. I have attached the application. You pay $25 bucks for the license, buy trap tags, take a written exam if it is your first time (another $15) and go grab some tourists. Currently there are approximately 20 operators. They can have 20 pots. Demo operators must paint a 12 inch orange circle on the side of their boat.

Just like Alaska, Maine started to get requests that didn't fall under their educational permits so they went to the legislature (in 2003) and created a law allowing demonstration fishery.

Here is the statute which created the license: This law was created in 2003
http://janus.state.me.us/legis/statutes/12/title12sec6810-A.html

And here are the regulations that back it up:
http://www.maine.gov/sos/cec/rules/13/188/188c110.doc

Maine Department of Marine Resources
Phone: 207.624.6576

Here is a example of a operator…$25 for a bit over an hour tour..
http://www.captainjacklobstertours.com/

Incorporating
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ER 2007
INFORMED FISHERMEN • PROFITABLE FISH[illegible] • SUSTAINABLE FISH

how time!

ering Sea crabber
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A salmon netter gets just what he wanted

The easy and hard of

LIVELIEST CATCH

An enterprising crabber offers tourists a gull's eye view

By Susan Chambers

Nine years in the wheelhouse of a Bering Sea crabber is a long time to think about a way to bring commercial fishing to life for the non-crabbing folk.

The culmination of those thoughts — turning an honest-to-goodness, wave-battered, king crab-catching vessel into a tourist business — collided with the burgeoning popularity of "Deadliest Catch," the Discovery Channel's most-watched TV show.

"At that time, I saw the vision to take [illegible] out commercial fishing out of Ketchikan," says David Lethin, skipper of the Aleutian Ballad and owner of the Bering Sea Crab Fishermen's Tour. "I would look at the ocean. I would look at the crew. I kept thinking, 'If you could just bring that to life...'"

Lethin admits it was an off-the-wall idea, but one that already has paid off in terms of customer approval. Lethin and the crew of the Aleutian Ballad began taking up to 150 visitors per trip from Ketchikan to nearby Annette Island in July — and showing them the thrills of catching king crab, Dungeness crab, octopus, longlining for blackcod, halibut and rockfish and the natural beauty of Southeast Alaska.

So far, only a couple people have called Bering Sea veteran Lethin crazy, though one did say he's "sold out."

But Lethin's fishing career reads like the career of many a highliner, but with a new twist to the most recent chapter: Chapter 1: Dream of fishing. Chapter 2: Deckhand. Chapter 3: Buy a boat. Chapter 4: Buy a bigger boat. Chapter 5: Build an even bigger boat. Chapter 6: Put your quota and other boats to work, build on the popularity of the "Deadliest Catch" and run a tourist business.

Lethin's idea of taking a solid player in the Bering Sea crab fishery and turning it into a tour business — on the face of it — may seem crazy or a "sellout" to some.

But it doesn't take long for the Aleutian Ballad's owner to convince anyone that the vessel's new job description means two things: It could be a money maker in a more stable business than crab fishing and it could provide a platform from which to share the adventure of commercial fishing with the public.

Lethin grew up in Oregon's Willamette Valley, in Salem, but spent time around his dad's charter boat business on the coast.

"I could hardly wait to go commercial fishing," Lethin says.

He fished on the Columbia River — for one year, then headed to Alaska. It wasn't long before he wanted his own boat.

Lethin had heard that a 67-foot aluminum boat named the Ballad, was for sale.

Lethin didn't know where in Charleston, Ore., the Ballad was tied up, but he ran into a boatbuilder named Don Giddings, who at the time was building a series of schooner-type, house-aft tenders to go to Alaska, and asked him if he knew where to find the Ballad.

Giddings pointed it out, and Lethin eventually purchased the boat for $150,000, then gutted the vessel and rebuilt it.

For Lethin, the next few years consisted of hard work, crabbing in Washington, Oregon and California and fishing for halibut and blackcod in Southeast Alaska.

"We brought in more than a million pounds of Dungies," says Lethin, referring to Dungeness crab.

But Lethin, a captain always willing to put his college degree in business to use and unafraid to take risks, wanted to tackle Alaska again, and he'd heard that the Bering Sea crab fishery was going to go limited entry in the early 19

"The door was going to slam sl says of the fisheries for king anc crab. "I wanted in that door."

He'd never fished the Bering S that didn't stop him. The advice crab pioneer Francis Miller only his dreams.

"His advice was, 'Build the bigg you can,'" Lethin says.

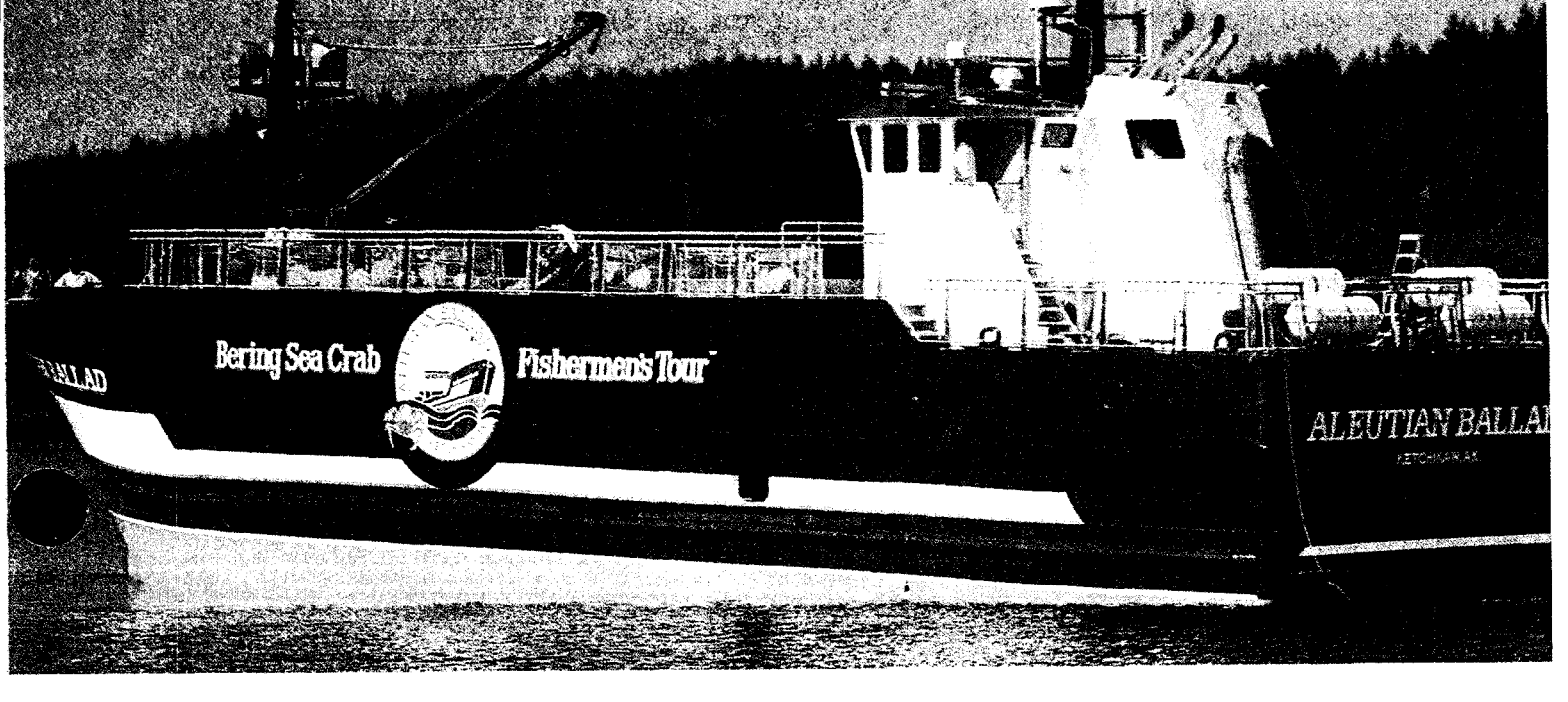
The Bering Sea chapter of fishing career began in 1992. H Miller's advice and traveled to Bi Batre, Ala., where the 115' x 30' hc Ocean Ballad was built.

It was only a few years later bought the Aleutian Ballad. In 1 returned to Charleston with a Don Jester, and built the 127' x 3 crabber Arctic Venture built at G Boat Works.

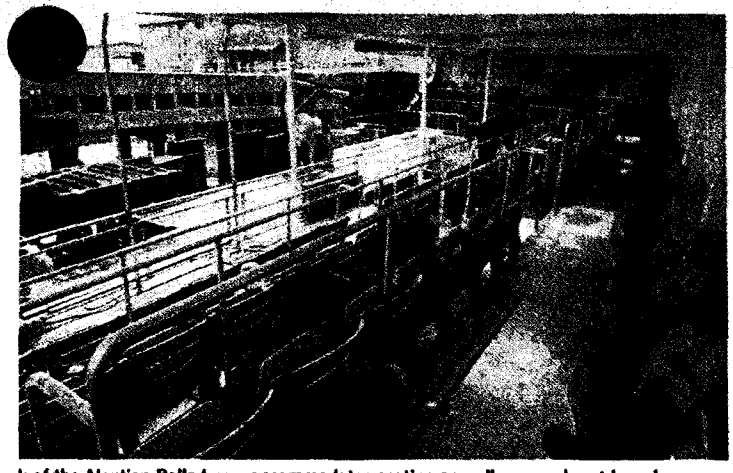
Fast-forward through years of Sea crab fishing and the years c troversy over crab rationalization. came out a winner, selling the Arc ture and Ocean Ballad but retain Ballad, the Aleutian Ballad, and a ful of other vessels as well as holdi valuable blackcod and halibut qu of course, Bering Sea crab quota quotas still are fishing. Lethin's usin but some of it is leased — particul Aleutian Ballad's quota.

It's June 2007, and Lethin is back dings Boat Works, staring throu wheelhouse windows aboard the A Ballad.

Electronics are being installed are hanging down from the ceili tools, moldings, cords, sheet meta pieces and dust are scattered abou



The Aleutian Ballad has rigged over fro catching crabs in the Bering Sea to catching tourists in Ketchikan, Alaska.



k of the Aleutian Ballad now accommodates seating as well as a crab pot launcher, : hauler and crab block. The conversion took more than seven months.

e calm waters and forested hillsides :h Slough remind him of Southeast and the inlets and islands around can.

in is anxious.

r seven months of grinding, scrap- aring, sanding, pulling, tugging, g, negotiating, planning, designing tting, the Aleutian Ballad is finally n the water.

nly when the Aleutian Ballad is and safely tied to the dock he a sigh of release, but still es in wonder at the changes in his at.

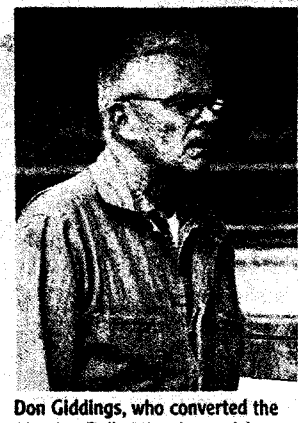
:e tiers of blue, stadium-style seat- rounds him on the deck. More seats top of the covered deck, designed y tourists out in the weather, if they ose. The seats all face the starboard here a pot launcher, sorting table, longline puller and Dungeness crab block all are installed. In front of the seats are rails, but instead of horizontal bars, there is stiff netting, the kind of mesh found on any king crab pot.

"I wanted them to feel like they're sitting in a stack of king crab pots," Lethin says, referring to the tourists. "I want to show people what's below the water."

Skylights in the shelter deck add to the ambiance. In addition to adding light to the main deck, passengers can look up and see mock king-crab pots, complete with buoys, above them.

The boat still has a galley, but it's been enlarged to include a small gift shop and a big, specialty coffee machine. The staterooms double as an infirmary in case any tourists feel under the weather. The large crane on deck is gone, replaced by the stadium seats that have also supplanted stacks

Boatbuilder to the stars



Don Giddings, who converted the Aleutian Ballad, has been plying his craft for decades.

The wall in Don Giddings' office next to his Charleston, Ore., shop is adorned with pictures of the boats he's built: The Maverick, Westling, Beauty Bay, Time Bandit and many more.

They're a testament to his nearly 30 years in the world of steel boatbuilding on the Pacific Coast.

Giddings Boat Works first opened shop in 1979. Giddings has built more than 20 boats in all: draggers, crabbers, combination boats and, in the early 1980s, a fleet of flat-bottomed, schooner-type tenders/crabbers, such as the Maverick and Time Bandit, that went to Alaska to crab in the winter and tender in the summer.

He also has done several refits, conversions and other projects over the years.

A former fisherman and U.S. Coast Guardsman, he built his business not so much on steel and design, but on integrity, his customers say.

"He's a fair man," says Aleutian Ballad owner David Lethin. "You know you're gonna get a fair deal. You don't even question it."

Lethin went to Giddings to have the king crabber Aleutian Ballad converted to a tourist vessel. The project took seven months and Lethin's devotion to Giddings never wavered.

"He does a good job," Lethin says. "You're lookin' at it."

Through the years, Giddings was able to get business away from some of the bigger shipyards in Seattle that catered to the Alaska fleet. It was his style of work that attracted boat owners to an out-of-the-way spot on the southern Oregon coast.

The prices are better, Lethin says, and so are Giddings' shop rates. He's also easy to work with and allows the vessel's crewmen to work alongside his workers, Lethin adds.

Giddings is never one to gloat or talk about his own success stories, but he did admit one day — in his typical, brief style — that he was proud to see the Maverick and Time Bandit as successful crabbers on the Discovery Channel's "Deadliest Catch" series.

"Wow," Giddings says, admitting, "yeah, it was kinda neat."

He has four grown daughters and no sons to take over the family business, and as of early August, he was in negotiations to sell to another local business. It may be a while yet before he is completely out of the boatbuilding business.

But even with all the pictures of boats on his wall, the photo that always catches Gidding's eye is one of his granddaughter, sitting in the cockpit of one of the planes his son-in-law flies in the U.S. Coast Guard.

And the only thing he'll say formally about retirement is, "I just don't know." — S.C.

of crab pots.

Five lifeboats and more than 150 life jackets are stored on board and all new [e]tronics have been installed, as well as [g]enerators to power deck lights and [w]ers. Fish holds have been converted to ballast tanks and cargo holds. The aft house was raised more than a foot and pushed forward about five feet, all in the name of safety: The captain must be able to have a good view of the deck and tourists.

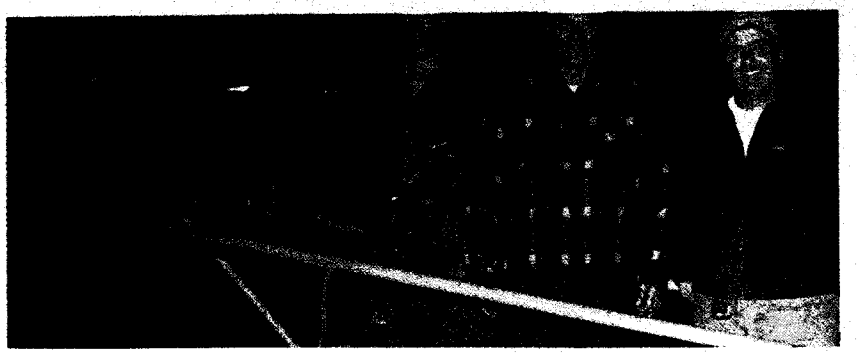
The crew, hardworking fishermen accustomed to hours of non-stop work, each now serves partly as crew member, partly as performer. They run the gear and run the boat but also wear wireless headsets, sharing their sea stories with the visitors.

One of them, Alan (Kiwi) Brann, jokes, "This is my retirement."

Lethin's Bering Sea Crab Fishermen's Tour aboard the Aleutian Ballad is ready to roll.

"You should see them," Lethin said excitedly referring to his new stock in trade — tourists — during July a phone call.

He and his crew, which includes Kiwi, Terry Barkley and Jerry (Corky) Tilley , all of whom who fished with him in the Bering Sea, have completed their first few tours, taking landlubbers out to Annette Island, near Ketchikan.



Alan (Kiwi) Brann (left), Don Giddings and owner David Lethin pause as they ready the Aleutian Ballad for Ketchikan.

Lethin says the tourists' eyes were wide open and in shock as the king crab pot landed on deck, not 15 feet away from them. One woman told Lethin this was the best thing she'd ever done in her life. "They were in awe," he said.

Thanks to a lot of time on the Bering Sea and his schooling in business, Lethin has a plan that virtually locks him into a future of tours.

Not that it was easy.

The U.S. Coast Guard doesn't have any regulations that specifically cover a cross-breed of fishing vessel and tour boat of this size. Coast Guard personnel were on the boat almost daily as it was being converted.

Another obstacle was the multitude of tour businesses already established in Ketchikan that cater to cruise ship passengers. There are more than a hundred, and Lethin is competing against fishing charters, float-planes, whale-watching vessels and more.

But he's not worried. He knows cruise ships will begin to book the Bering Sea Crab Fishermen's Tour as soon as word gets out.

Last but not least, the fishing premise itself created a hurdle. Lethin's plan was for the tour to be catch-and-release.

"We don't want to decimate the resource," He says. " We want to enhance it."

Figuring he would be hard-pressed to get an exemption to catch crab and other species out of season in U.S. waters, he approached the Metlakatla Indians, the only federally recognized Native American tribe in Alaska with sovereign nation status and their own island.

He worked a deal with the tri[be] fishes their waters exclusively a tribe gets a cut of the profit.

The four-hour tour takes visi[tors] Annette Island, where the Aleutian[s] sets crab pots, longlines and octop[us] Crab, wolf eel, octopus, prawns, blackcod and any other animals are in live tanks in front of the seati[ng] The boat also passes herring, salm[on] other fishermen, giving tourists a [look] other working vessels.

"It's just amazing," Lethin says, ing like a tourist himself. "You know what you're going to see."

Susan Chambers is a page design edit[or] reporter for the Coos Bay (Ore.) Worl[d]

PC 10

UNITED FISHERMEN OF ALASKA

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Juneau, Alaska 99801-1172
(907) 586-2820
(907) 463-2545 Fax
E-Mail: ufa@ufa-fish.org
www.ufa-fish.org

November 5, 2007

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

RECEIVED
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BOARDS

Dear Chairman Morris,

United Fishermen of Alaska (UFA) is an association comprised of 36 member fishermen's associations from across Alaska. UFA member groups represent every gear group and every major commercial fishery in Alaska. UFA unanimously opposes all 7 of the Board of Fisheries (BOF)-generated proposals approved at the recent work session in October 2007. UFA has watched with increasing concern in recent years as this "board generated proposal" process has been used increasingly to circumvent the established proposal process.

UFA supports the established proposal process which allows for regular and thorough public and Advisory Committee review. For unusual or unanticipated circumstances, UFA supports the Agenda Change Request (ACR) process which has clearly established criteria for consideration by the Board. The current suite of accepted Board generated proposals include actions that are clearly allocative and would not be acceptable under ACR criteria.

Clearly, proposals that can be generated by the board and scheduled for final action in as little as 30 days do not provide sufficient time for public review and therefore make a mockery of public process.

UFA opposes all 7 of the Board generated proposal accepted by the Board of Fisheries at the October 2007 work session. UFA is opposed to any further improper use of this process in the future. Board generated proposals need to be submitted using the same process and timing of a proposal submitted by the public in order to meet the standard of an "open and transparent process".

Sincerely,

Mark Vinsel
Executive Director

CC Honorable Sarah Palin, Governor, State of Alaska
Cora Crome, Office of Governor Sarah Palin

PC 11

ALASKA FEDERATION OF NATIVES, INC.
1577 C Street, Suite 300, Anchorage, Alaska 99501
907-274-3611 Fax 907-276-7989

November 7, 2007

RECEIVED
NOV 0 8 2007
BOARDS

The Honorable Sarah Palin
Governor of the State of Alaska
P.O. Box 110001
Juneau, Alaska 99811-0001

Dear Governor Palin:

I am writing, on behalf of the Alaska Federation of Natives, in support of the position taken by Ahtna, Inc. in response to the Alaska Outdoor Council's letter to you dated October 15, 2007. That letter criticized the decision of the Joint Boards of Fish and Game to reject further analysis and consideration of Proposal 38, which would create a non-subsistence use area encompassing most of GMUs 11 and 13. AFN shares Ahtna's concerns over the AOC's effort - and that of at least one member of the Board of Game - to reconvene the Joint Boards to reconsider the issue.

The AOC's attacks on the Division of Subsistence are unwarranted. Prior to the Joint Boards' meeting in Anchorage on October 8, AFN reviewed the Division's written report regarding Proposal 38 and submitted comments on the proposal (attached.) AFN agreed with what is obvious from the Division's report, and to anyone who has any understanding of the Ahtna region: There simply are no data to support reclassification of that area as a non-subsistence use area. The proposal is without merit.

The AOC's criticism of the Subsistence Division is essentially a charge that no information should have been presented to the Board regarding the subsistence uses of Ahtna communities located outside the proposed non-subsistence use area boundary. The AOC takes this position, despite the fact that these communities depend on the proposed non-subsistence use area to meet their food needs. This view is extreme and has the potential to create arbitrary non-subsistence use areas far beyond the Ahtna region. AFN is firmly opposed to the AOC's hostile interpretation of the information which is necessary in making decisions about non-subsistence use areas. AFN joins Ahtna in urging you to reject the AOC's assertions.

AFN also joins with Ahtna in expressing the deep frustration felt by many residents of rural Alaska over the constant regulatory attack on subsistence rights, Proposal 38 being only the latest example. As we pointed out in our comments, the proposal "appears to be motivated not by a change in the socio-economic status of the area, but by a desire on the part of non-subsistence hunters to open the area to sport hunting at the expense of subsistence users..." Fortunately, the Joint Boards agreed that the proposal should not be advanced, and that decision should stand. ADF&G should

support the Board's decision and refuse to be drawn in on the side of an organization like the AOC.

Thank you for this opportunity to express our views.

Sincerely,

Julie Kitka

Julie Kitka
President

/chd

Enclosure – AFN Comments on Joint Boards Proposal 38

cc: Denby Lloyd, Alaska Commissioner of Fish and Game
Jim Marcotte, Executive Director, Alaska Board of Fisheries
Kristy Tibbles, Executive Director, Alaska Board of Game
Ken Johns, President & CEO, Ahtna, Inc.
Brenda Rebne, Chairperson, AFN Subsistence Work Group

RECEIVED TIME NOV. 8. 2:35PM

RC12

LOWER COOK INLET

DELIBERATION MATERIAL FOR THE NOVEMBER 2007 BOARD OF FISHERIES MEETING

~SALMON (SPORT, PERSONAL USE) & GROUNDFISH (SPORT)~

Homer, Alaska
Prepared by:

Division of Sport Fish
and
Division of Commercial Fisheries

TABLE OF CONTENTS

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Proposals #1-2

Table 1 & 2A.-Estimated harvests of Anchor River king salmon from exploitation rates in the range sustained by Alaskan king salmon stocks.

Year	Anchor River escapement	Freshwater harvest	Estimated marine Harvest[b]	Total run	Current exploitation rate	Projected Anchor River harvests at higher exploitation rates					
						0.20	0.25	0.30	0.35	0.40	0.45
2003	9,237 [a]	1,011									
2004	12,016	1,561	566	14,143	0.15	2,829	3,536	4,243	4,950	5,657	6,364
2005	11,095	1,432	525	13,052	0.15	2,610	3,263	3,915	4,568	5,221	5,873
2006	8,945	1,394	431	10,770	0.17	2,154	2,692	3,231	3,769	4,308	4,846
2007	9,622										
Average 2004-2006	10,685	1,462	507	12,655	0.16	2,531	3,164	3,796	4,429	5,062	5,695

[a]Partial count

[b]Estimated marine harvest is 4% of total run based upon Deep Creek and Ninilchik River hatchery marine exploitation rates estimated from coded wire tags.

1-2A

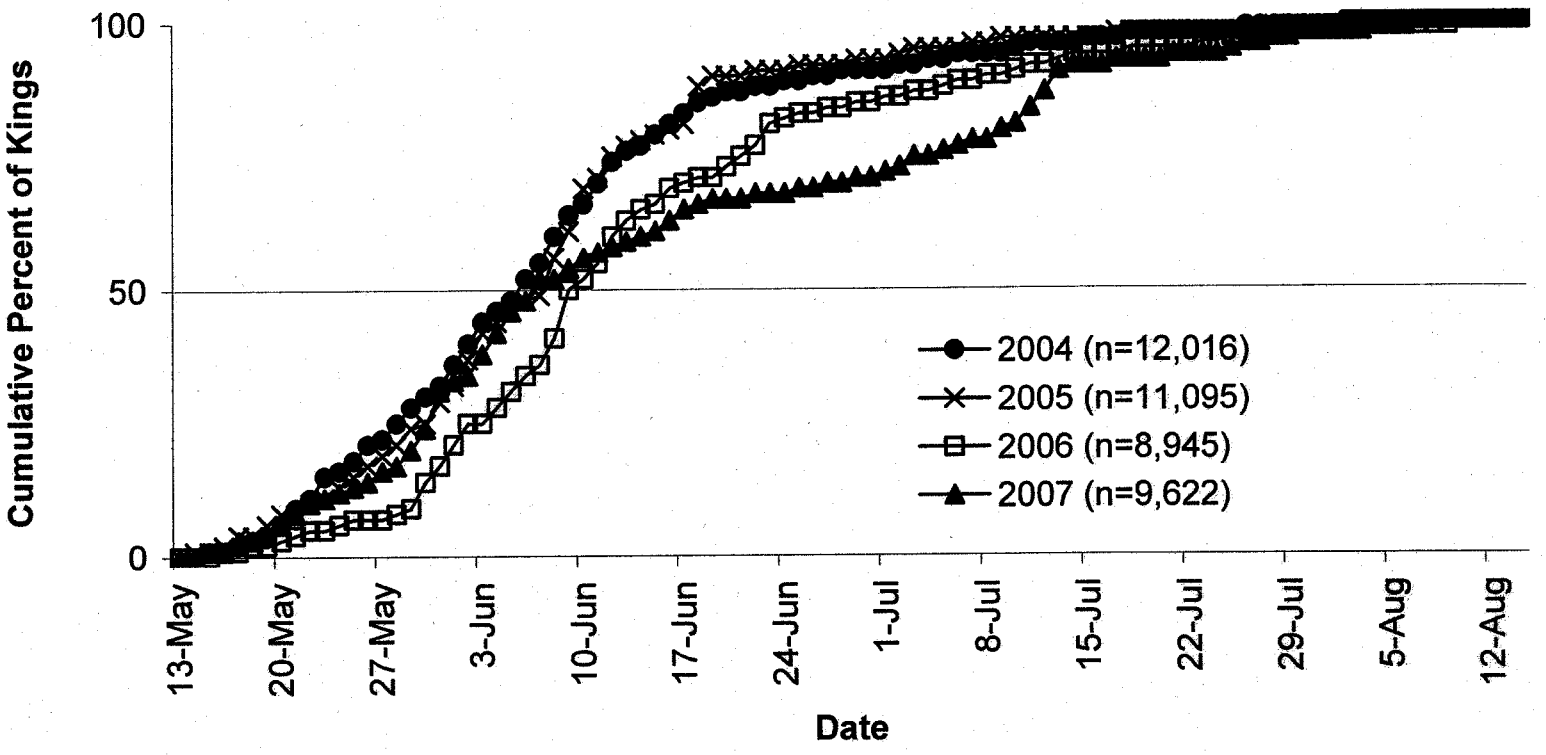


Figure 1 & 2B- Run timing of Anchor River king salmon at the sonar/weir site from 2004 to 2007.

1-2B

1-2C

Table 1 & 2C.- Number of emigrating steelhead trout captured in nets during the sonar operation on the Anchor River from 2003 to 2007.

	Caught in Nets	
Year	Date	Steelhead Catch
2003	21-May to 10-Jul	0
2004	1-Jun to 24-Jun	0
2005	19-May	2
	31-May	1
	2-Jun	0
	8-Jun	6
	10-Jun	2
Total		11
2006	24-May	1
	30-May	3
	31-May	7
	6-Jun	3
	8-Jun	3
	13-Jun	1
	15-Jun	3
Total		21
2007	23-May	11
	25-May	12
	29-May	12
	31-May	21
Total		56

1-2D

Table 1 &2D- Counts of immigrating steelhead trout through weirs on the Anchor River in from 1987 to 1995, and from 2004 to 2007.

Year	Date of Operation	Total Count	Cumulative Count on Sept. 11
1987[a]	July 4 - Sept. 11	136	136
1988[a]	July 3 - Oct. 5	878	220
1989[a]	July 6 - Nov. 5	769	358
1990[a]	July 4 - Aug. 15	3	Weir Out
1991[a]	July 4 - Aug. 15	5	Weir Out
1992[a]	July 4 - Oct. 1	1,261	390
1993[a]	July 3 - Aug. 16	1	Weir Out
1994[a]	July 3 - Aug. 16	1	Weir Out
1995[a]	July 4 - Aug. 12	10	Weir Out
2004[b]	June 9- Sept. 13	20	20
2005[b]	June 3- Sept. 9	107	Weir Out
2006[b]	June 13- Aug. 24	2	Weir Out
2007[b]	June 7-Sept. 12	336	326

[a]Source: Larson et al. 1988 and 1989, Larson 1990-1995, 1997 when escapment weir was located approximatly 1 mile upstream of the mouth.

[b]Project location is approximatly 2 miles upstream from mouth.

Proposals #3-5

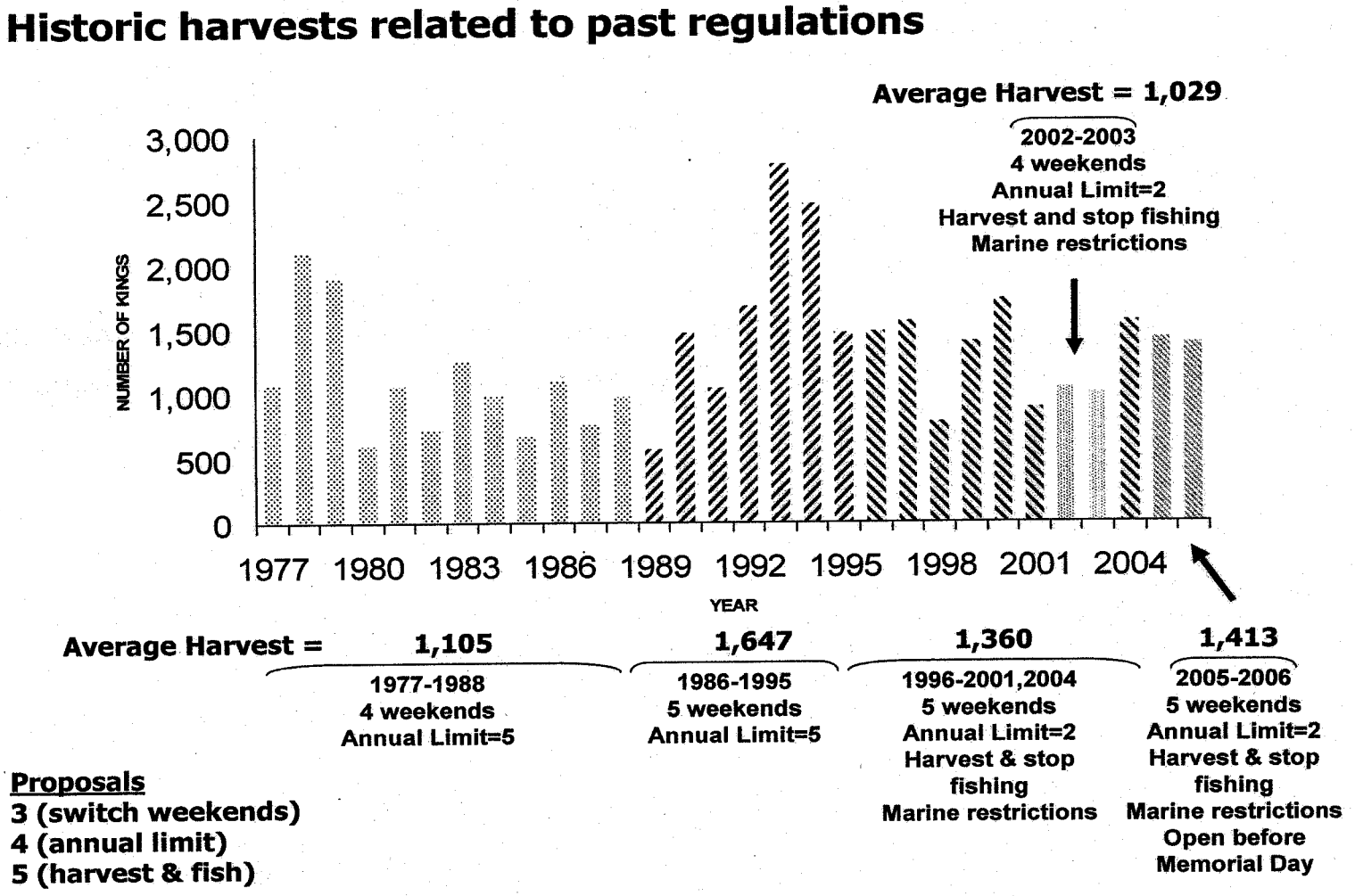


Figure 3-5A.-Anchor River historic freshwater king salmon harvests related to past regulations

3-5A

Daily Escapement Counts & Weekend Openings

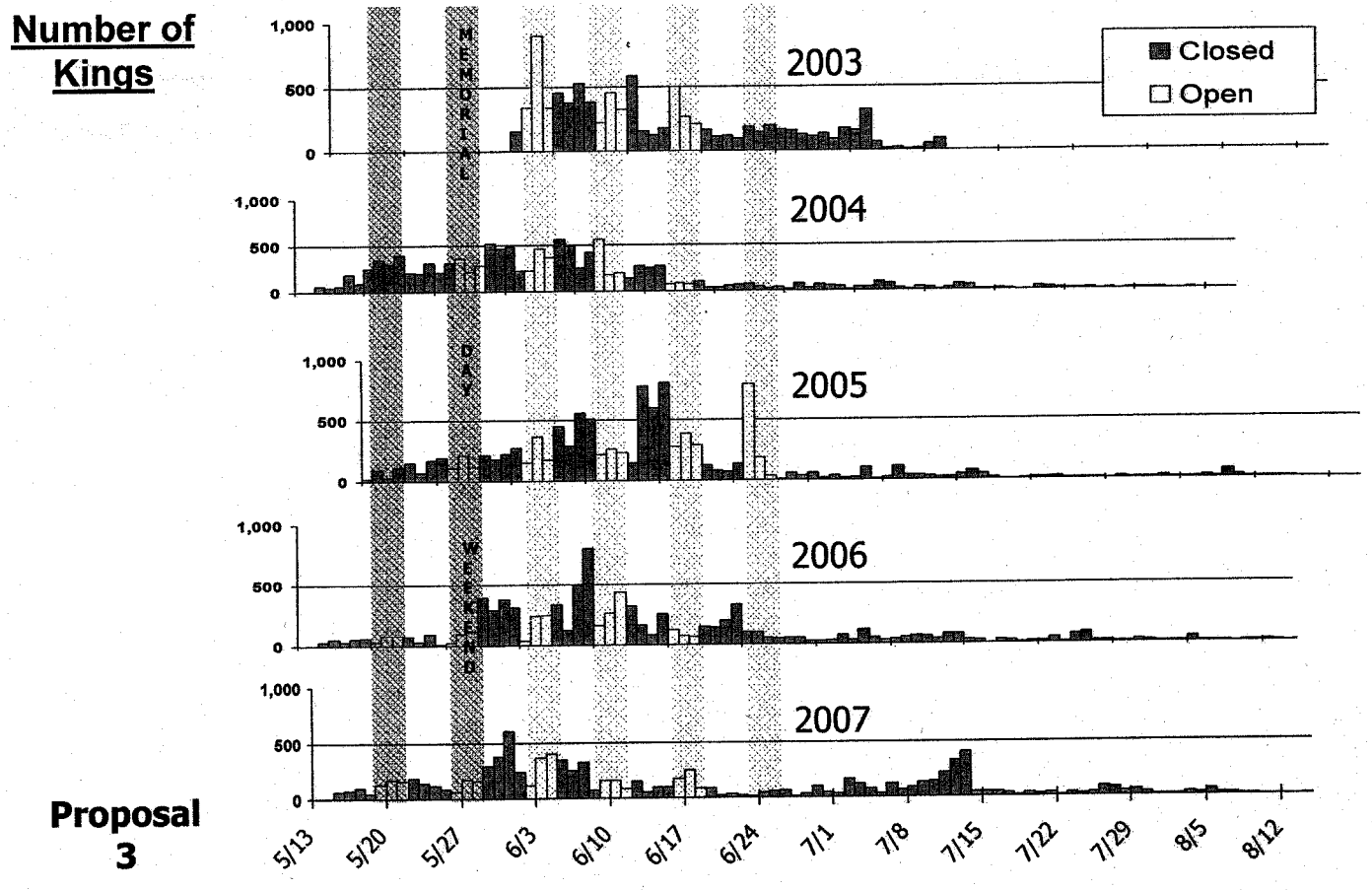


Figure 3-5B.-Anchor River daily escapement counts of king salmon related to weekend openings, 2003 to 2007.

3-5B

10-11
A&B

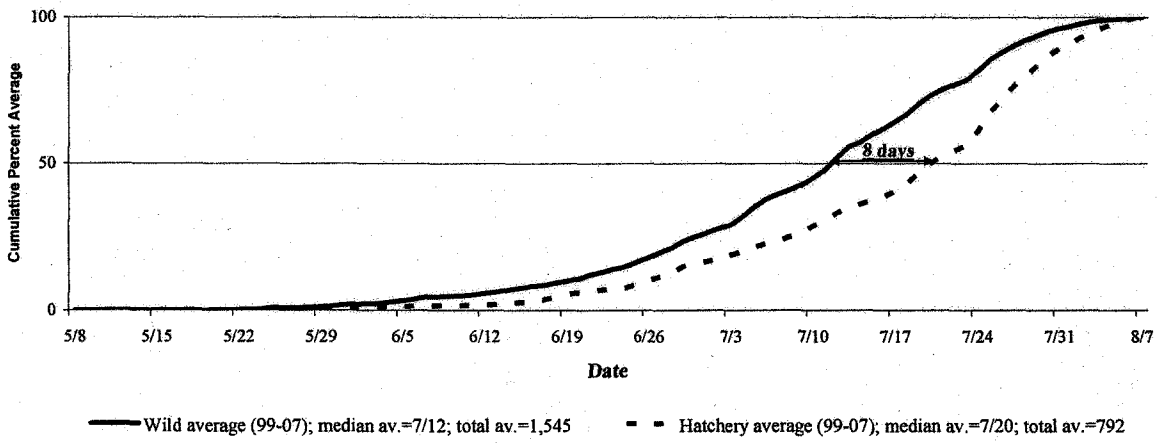


Figure 10-11A.- Run timing by cumulative percent, of the average daily weir count of wild and hatchery reared king salmon counted through the Ninilchik River weir from 1999 to 2007.

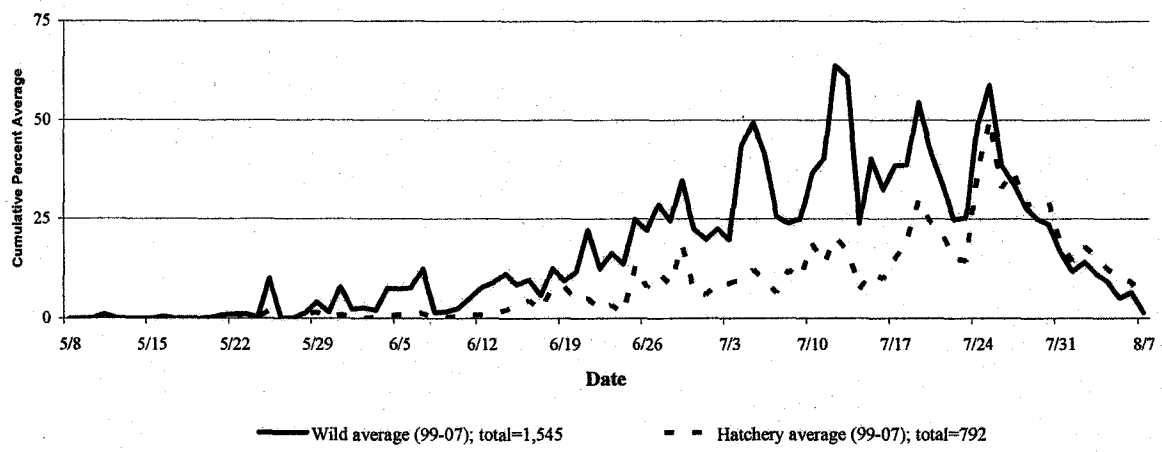


Figure 10-11B.- Average daily count of wild and hatchery reared king salmon through the Ninilchik River weir from 1999 to 2007.

10-11
C&D

Table 10-11C.- Summary of wild and hatchery reared composition estimates from Ninilchik River sport harvest samples collected during weekend fisheries, 2000 through 2006.

		King Salmon Harvest Samples Including Jacks							King Salmon Harvest Samples Excluding Jacks							
		Wild			Hatchery			Total		Wild			Hatchery			Total
Year	Weekend	Number Sampled	Percent	SE	Number Sampled	Percent	SE	Number Sampled	Weekend	Number Sampled	Percent	SE	Number Sampled	Percent	SE	Number Sampled
2000	1	37	47	8	42	53	8	79								
	2	53	51	7	51	49	7	104								
	3	55	55	7	45	45	8	100								
	Total	145	51	4	138	49	4	283								
2001	1	57	58	7	42	42	8	99								
	2	34	42	9	47	58	7	81								
	3	43	52	8	39	48	8	82								
	4	20	33	11	41	67	7	61								
	Total	154	48	4	169	52	4	323								
2002	3	77	78	5	22	22	9	99								
2003	3	37	69	8	17	31	12	54								
2006	1	44	75	7	15	25	12	59	1	41	45	8	13	55	7	54
	2	63	58	6	46	42	7	109	2	59	43	7	23	57	6	82
	3	82	57	5	61	43	6	143	3	79	43	6	41	57	5	120
		189	61	4	122	39	4	311		179	43	4	77	57	3	256
	Avg. weekend 3	59	62	6	37	38	8	96								

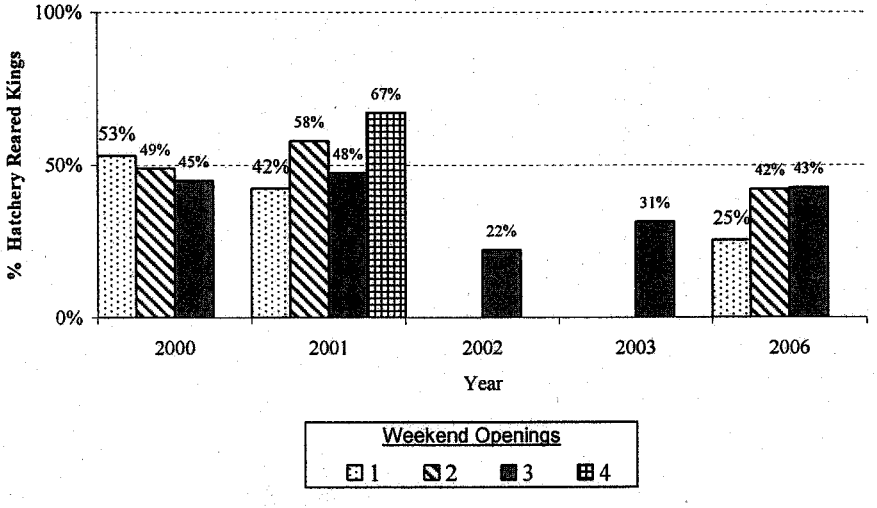


Figure 10-11D.- Percentage of hatchery reared king salmon from sport harvest samples collected during weekend fisheries from 2000 through 2006.

10-11
E&F

Table 10-11E.- Beach seine catch of wild and hatchery reared king salmon, and steelhead trout within the area open to sport fishing on the Ninilchik River in 2007.

Date	King Salmon Caught			Percent	Steelhead
	Wild	Hatchery	Total	Hatchery	Caught
5/24	26	7	33	21%	18
5/30	23	0	23	0%	7
6/6	45	6	51	12%	13
6/13	34	6	40	15%	14
6/20	73	14	87	16%	2
6/27	93	21	114	18%	0
7/5	105	11	116	9%	0
7/11	44	14	58	24%	0
Total	443	79	522	15%	54

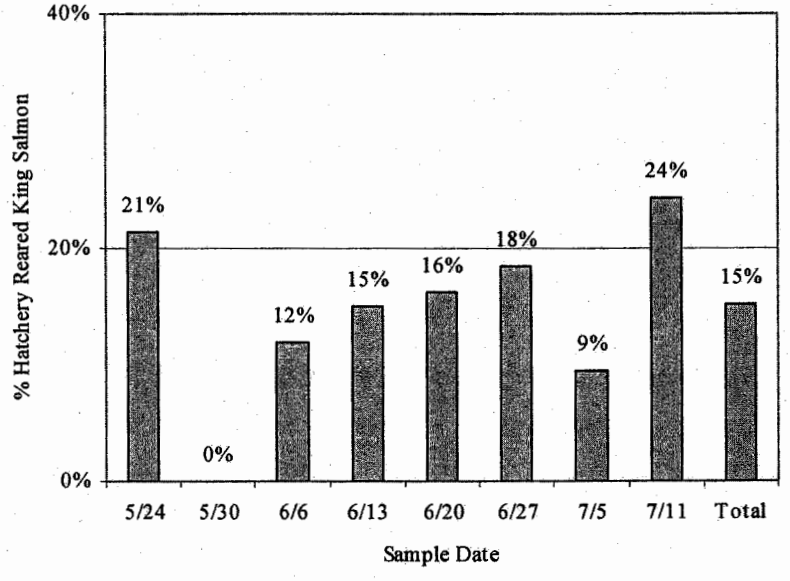


Figure 10-11F.- Percentage of hatchery reared king salmon caught in a beach seine within the area open to sport fishing on the Ninilchik River in 2007.

10-11
G&H

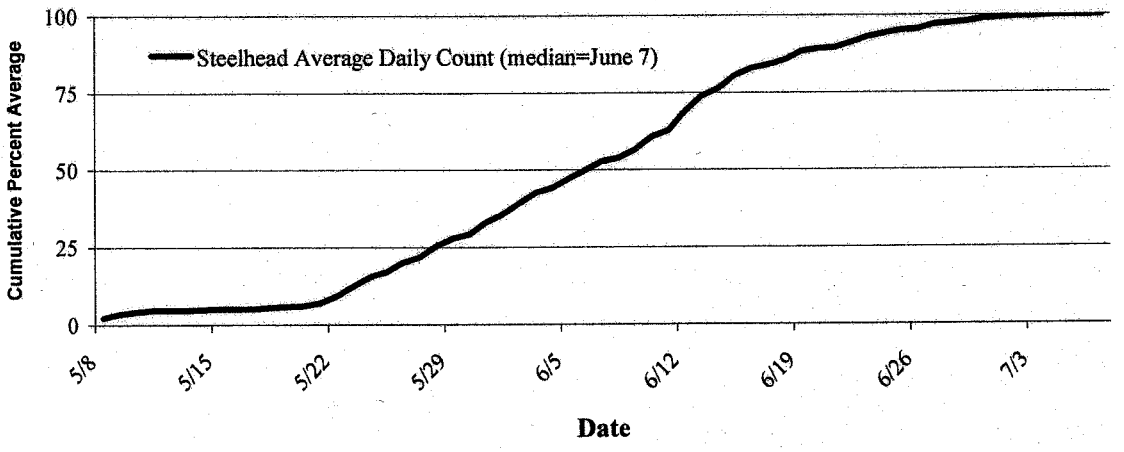


Figure 10-11G.- Cumulative percent of the average daily counts of emigrating steelhead trout past the Ninilchik River weir from 1999 to 2005.

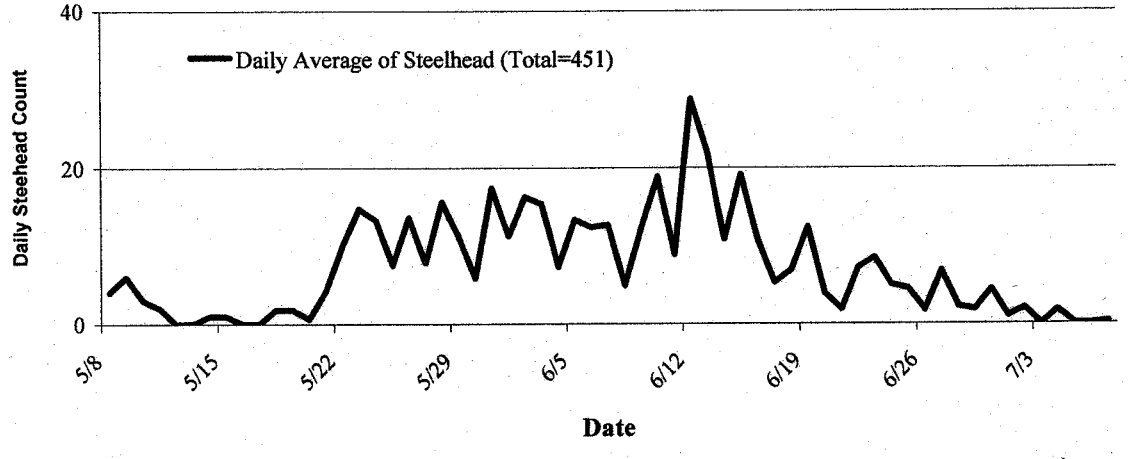


Figure 10-11H.- Average daily count of emigrating steelhead trout past the Ninilchik River weir from 1999 to 2005.

Proposal #15

15A

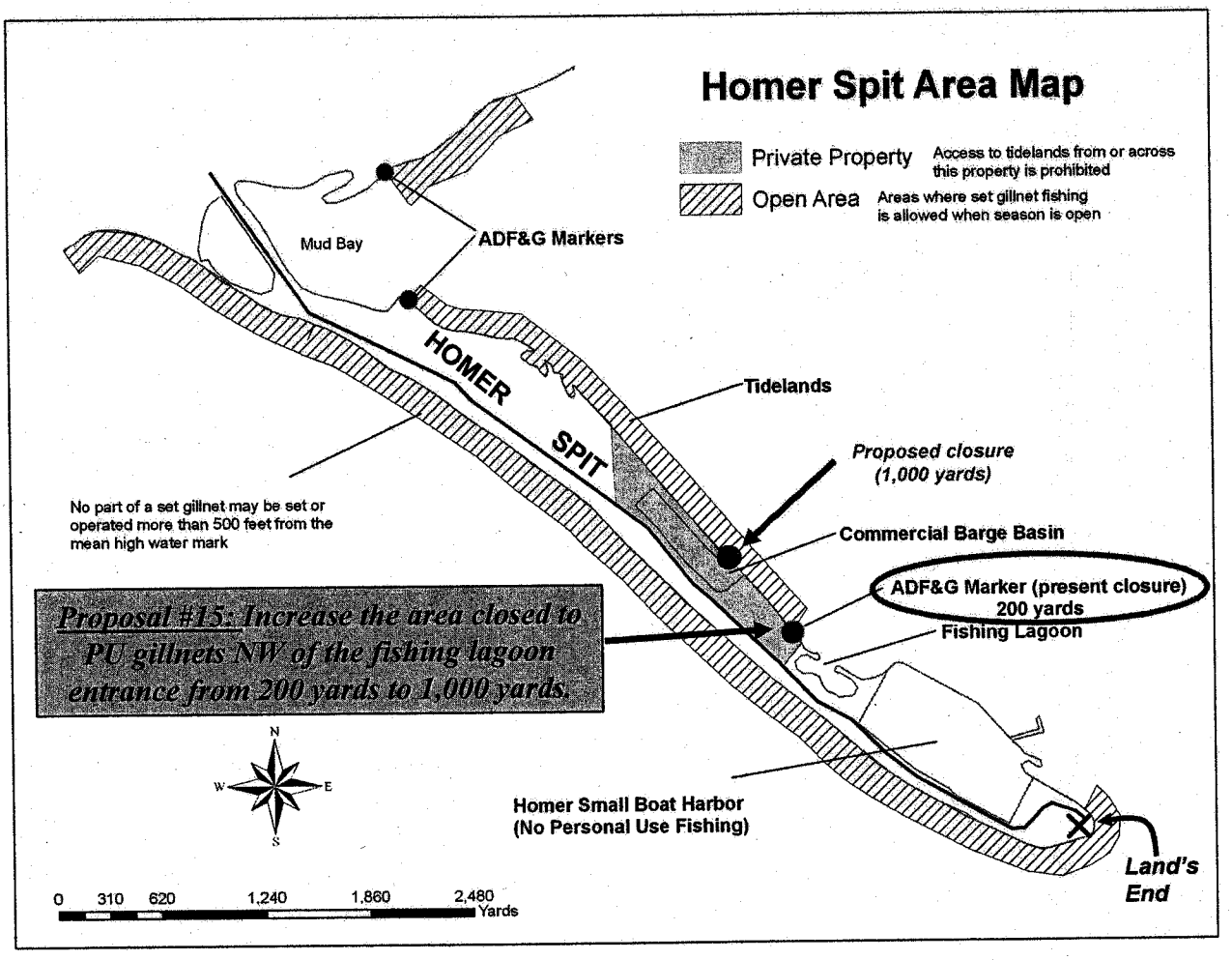


Figure 15A.-Area closed to personal use gillnets NW of the fishing lagoon entrance.

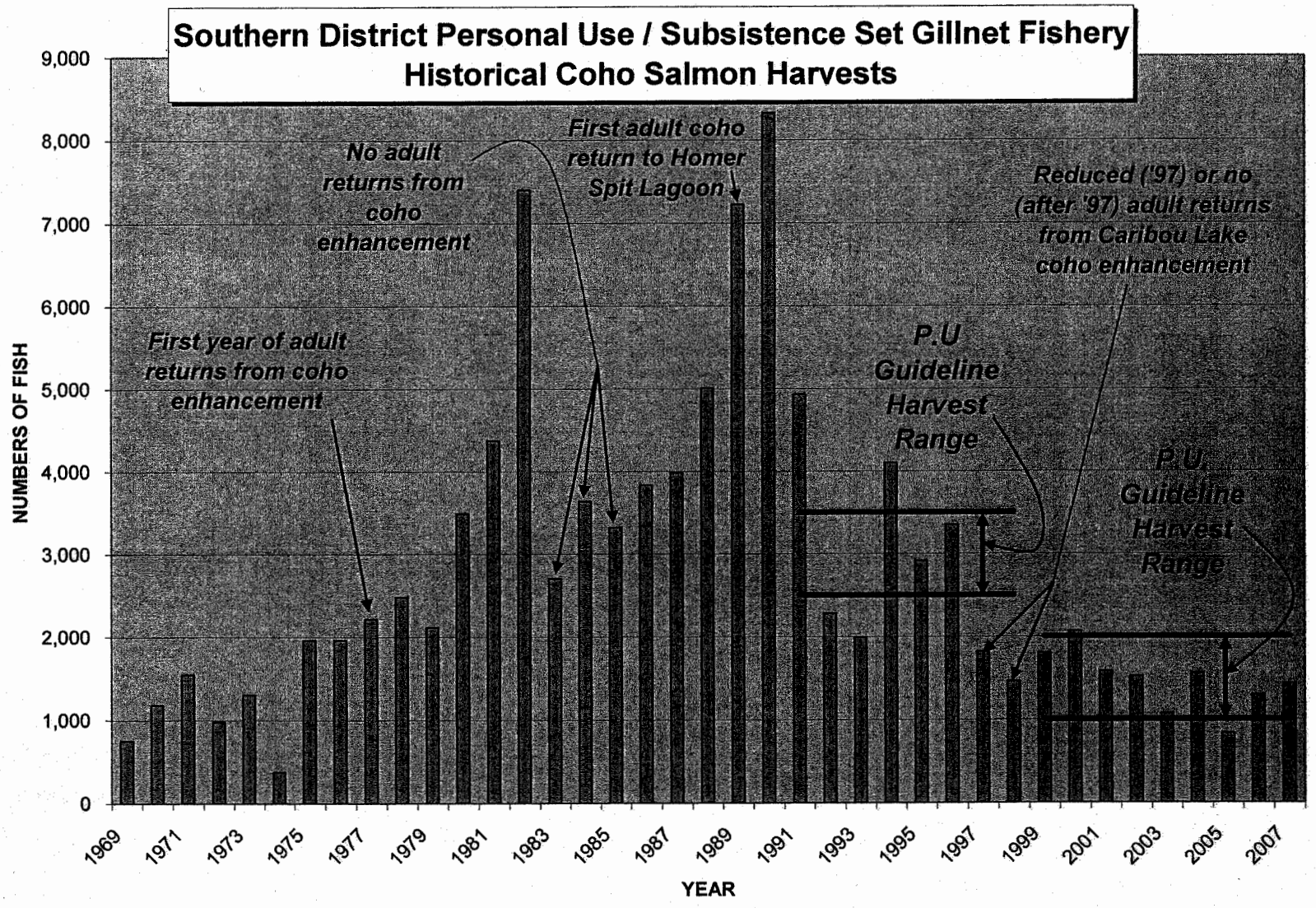


Figure 15B.-Southern District personal use / subsistence set gillnet fishery historical coho salmon harvests.

15B

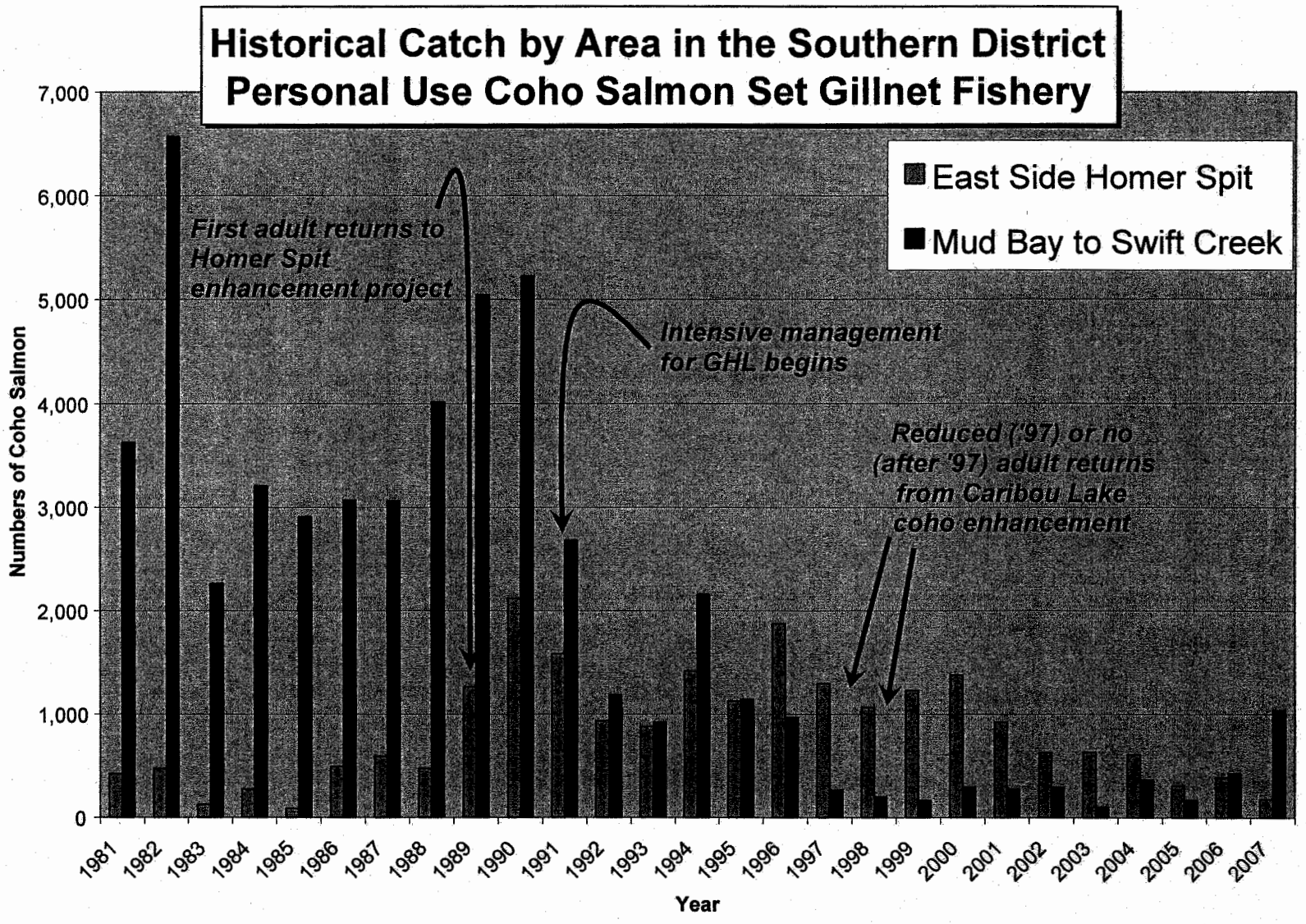


Figure 15C.-Historical catch by Area in the Southern District personal use coho salmon set gillnet fishery.

15C

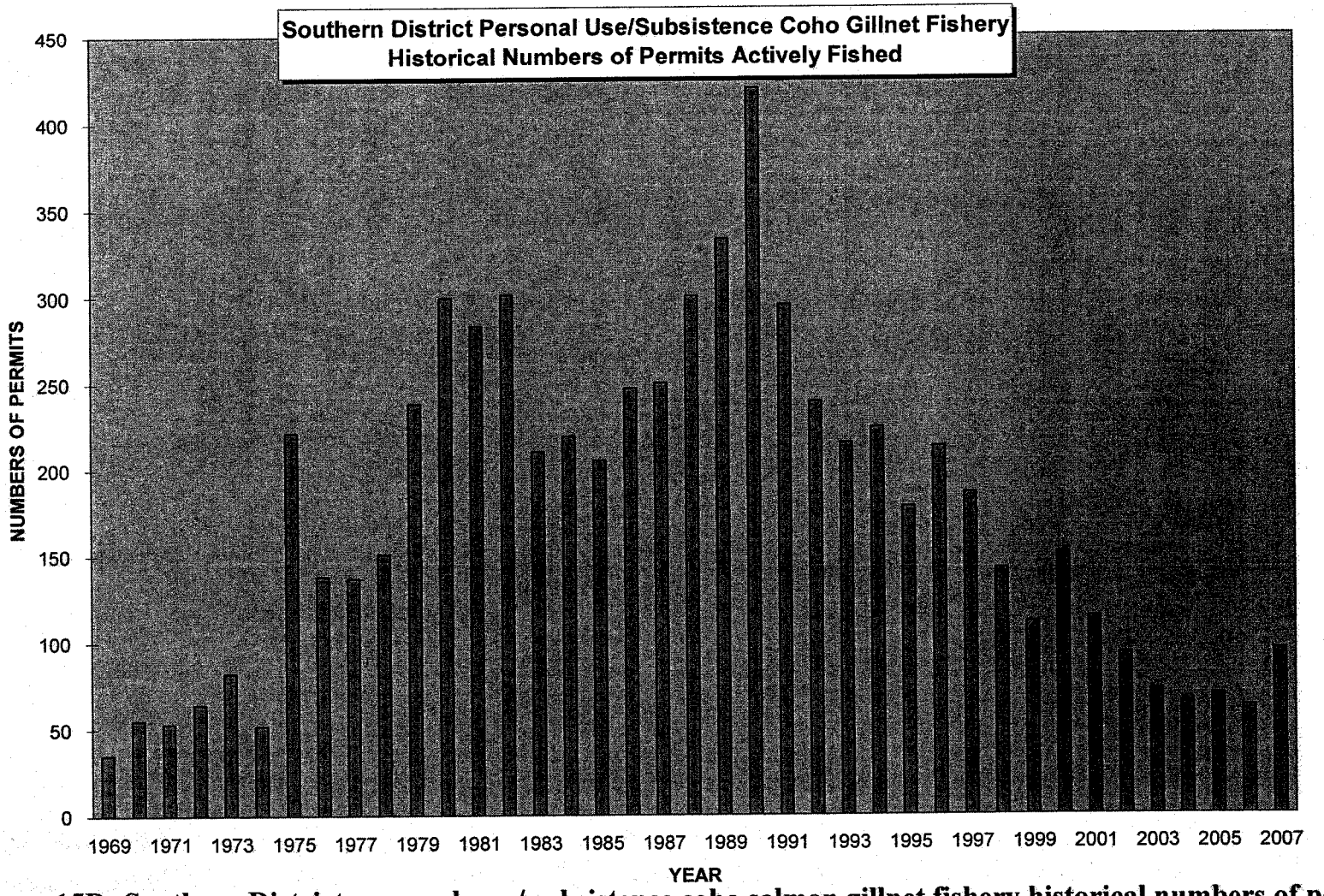


Figure 15D.-Southern District personal use / subsistence coho salmon gillnet fishery historical numbers of permits actively fished.

15D

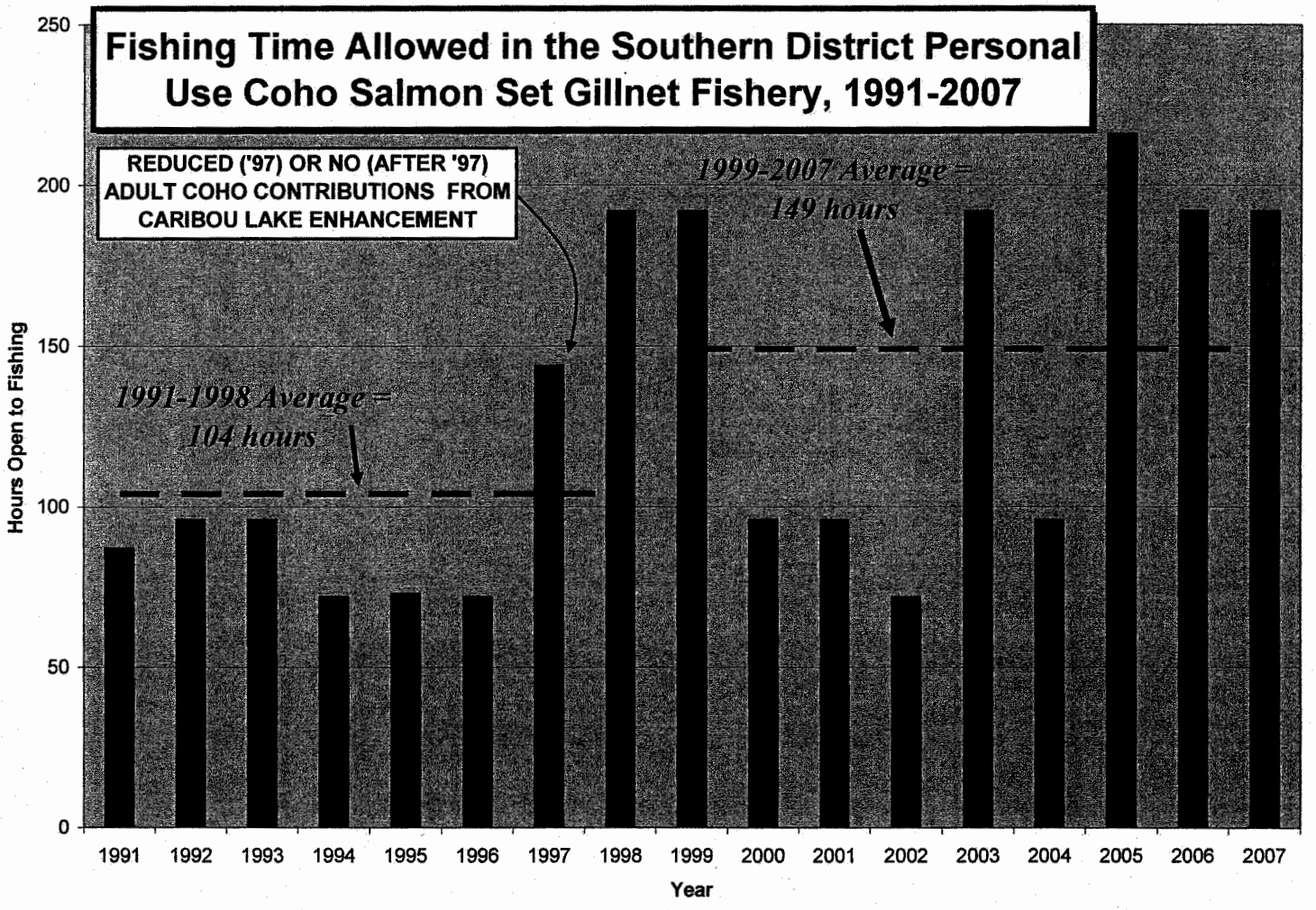


Figure 15E.-Fishing time allowed in the Southern District personal use coho salmon set gillnet fishery, 1991-2007

15E

15F

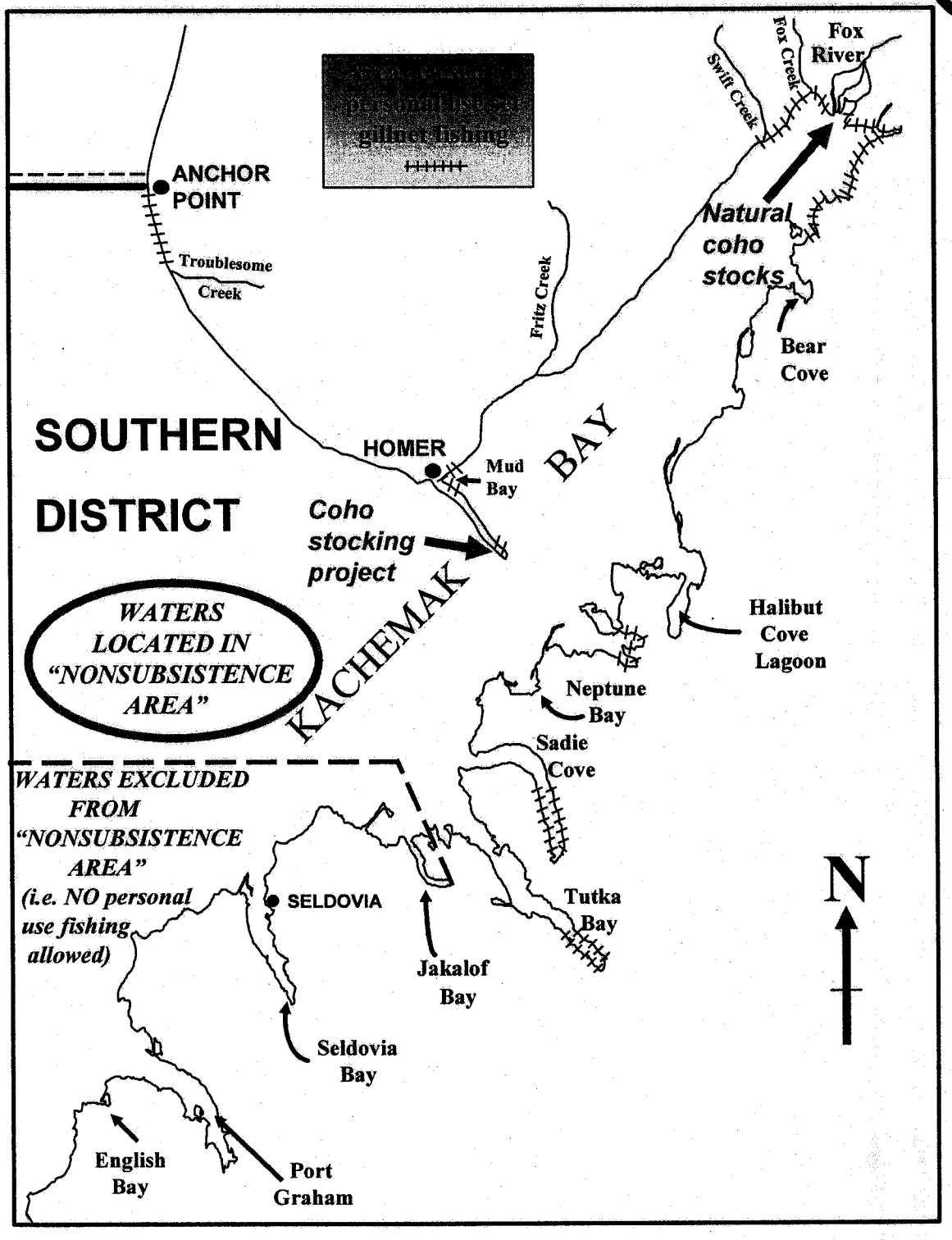


Figure 15F.-Area closed to personal use gillnets NW of the fishing lagoon entrance.

18A

Proposal #18

5 AAC 75.026(b) Use of Sport-caught fish as bait.

(b) Whitefish, herring, and other species of fish for which no seasonal or harvest limits are specified in 5 AAC 47 - 5 AAC 75, as well as the head, tail, fins, and viscera of legally taken sport-caught fish taken under 5 AAC 47- 5 AAC 75, may be used for bait, ***or other purposes***.

Table 18A.- Shark harvest (all species) in the Cook Inlet-Resurrection Bay Saltwater Area estimated by the Statewide Harvest Survey.

Year	Cook Inlet	North Gulf	Total
1998	235	196	**431**
1999	184	234	**418**
2000	128	199	**327**
2001	285	66	**351**
2002	158	177	**335**
2003	450	183	**633**
2004	206	110	**316**
2005	476	358	**834**
2006	325	116	**441**

18B

Table 18B.- Sport spiny dogfish catch and retention by anglers interviewed in the Cook Inlet-Resurrection Bay Saltwater Area, 2003-2007.

Port	Year	No. Int.	AnglDays	SDFcatch	SDFkept	% retained
CCI[a]	2003	638	3,124	1,132	1	0.1%
	2004	471	2,393	1,262	12	1.0%
	2005	473	2,452	1,097	2	0.2%
	2006	608	3,364	707	1	0.1%
	2007	664	3,063	727	2	0.3%
Homer	2003	570	3,389	200	1	0.5%
	2004	622	3,838	434	9	2.1%
	2005	781	4,494	1,090	3	0.3%
	2006	716	3,785	1,077	2	0.2%
	2007	690	3,591	580	13	2.2%
Seward	2003	498	3,007	1,198	0	0.0%
	2004	922	5,822	2,866	9	0.3%
	2005	329	1,974	2,010	13	0.6%
	2006	537	3,477	2,099	1	0.0%
	2007	375	2,287	1,257	3	0.2%

[a]- Central Cook Inlet = Deep Creek and Anchor Point

18C

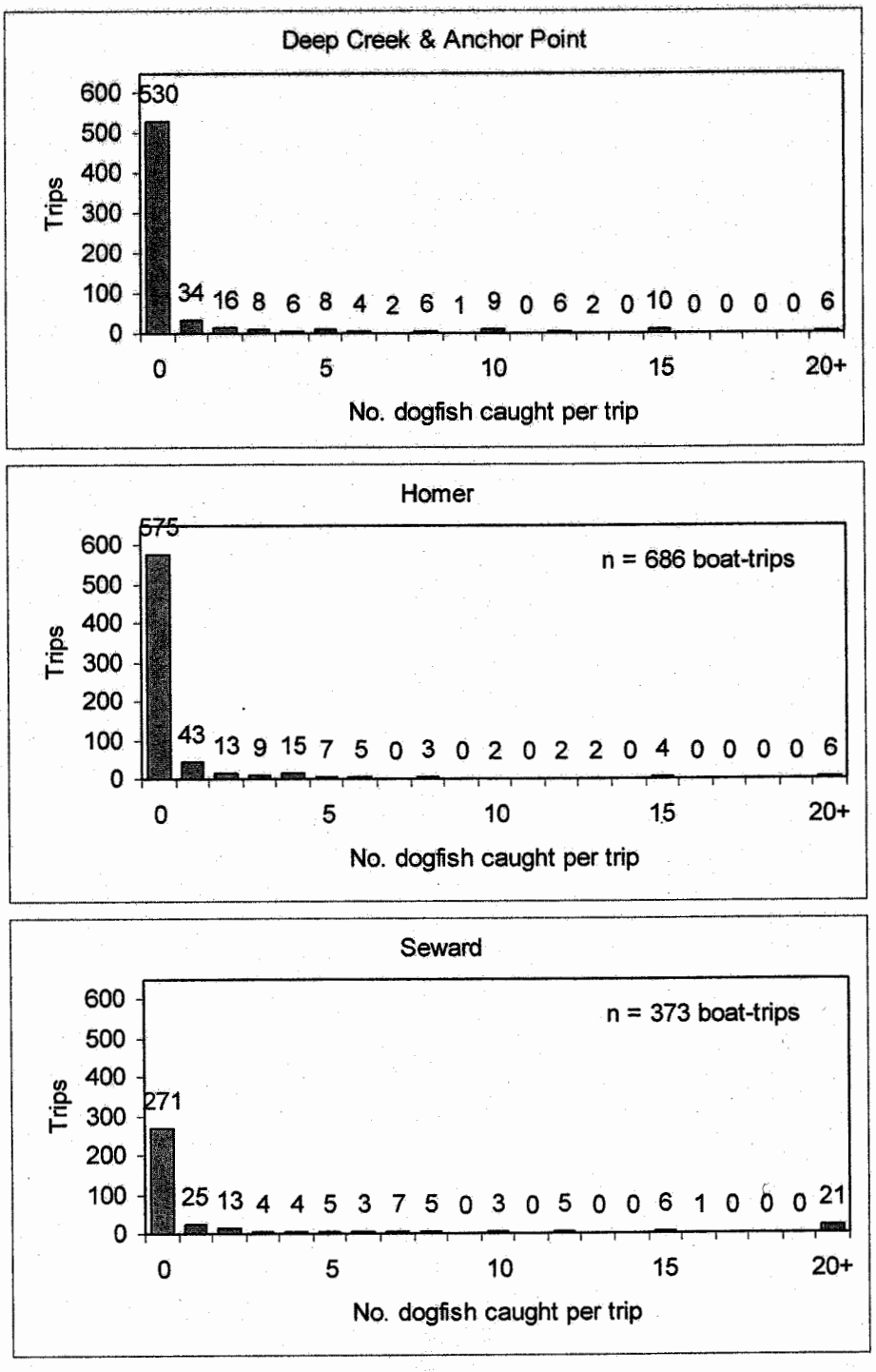


Figure 18C.- Frequency distribution of reported spiny dogfish catch per boat-trip in Cook Inlet-Resurrection Bay fisheries in 2007.

19A

Proposal #19

Reduce daily possession limit of rockfish between Gore Point to Cape Puget

Table 19A.- Estimates of recreational rockfish harvest (number of fish) landed at the Port of Seward, 1984-2006. Estimates of charter and non-charter harvest are not available before 1986.

year	Catch	Total Harvest	Released	Percent Released
1984		23,211		
1985		17,105		
1986		38,838		
1987		12,880		
1988		35,768		
1989		24,957		
1990	32,770	19,243	13,527	41%
1991	27,784	19,868	7,916	28%
1992	40,119	28,729	11,390	28%
1993	41,445	25,003	16,442	40%
1994	43,080	28,256	14,824	34%
1995	25,568	17,360	8,208	32%
1996	33,018	21,461	11,557	35%
1997	35,636	20,385	15,251	43%
1998	40,580	20,875	19,705	49%
1999	41,334	24,008	17,326	42%
2000	54,600	30,354	24,246	44%
2001	56,504	32,461	24,043	43%
2002	61,557	39,959	21,598	35%
2003	50,019	30,450	19,569	39%
2004	81,211	47,342	33,869	42%
2005	64,361	38,512	25,849	40%
2006	64,027	38,673	25,354	40%
97-06	54,983	32,302	22,681	38%

19B

Table 19B. Recreational rockfish harvest by assemblage, North Gulf Coast, 1991-2006.

Year	Demersal	Pelagic	Slope	Total
1991	5,675	13,821	372	**19,868**
1992	6,407	21,532	789	**28,729**
1993	7,646	16,531	826	**25,003**
1994	6,270	21,164	823	**28,256**
1995	7,267	9,446	647	**17,360**
1996	3,066	18,295	101	**21,461**
1997	5,306	14,847	233	**20,385**
1998	3,942	16,575	358	**20,875**
1999	8,016	15,307	685	**24,008**
2000	10,175	20,009	171	**30,354**
2001	7,819	24,583	59	**32,461**
2002	6,625	32,920	414	**39,959**
2003	3,635	26,592	223	**30,450**
2004	10,072	36,776	493	**47,342**
2005	8,430	28,884	1,198	**38,512**
2006	8,765	29,155	753	**38,673**

19C

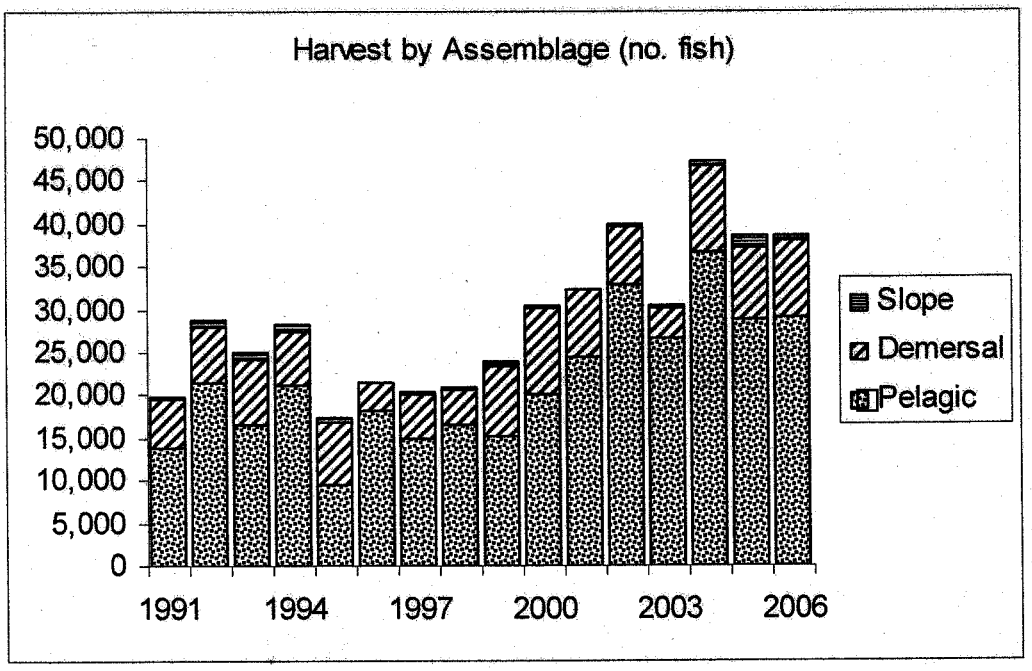


Figure 19C. Recreational rockfish harvest by assemblage, North Gulf Coast, 1991-2006.

19D

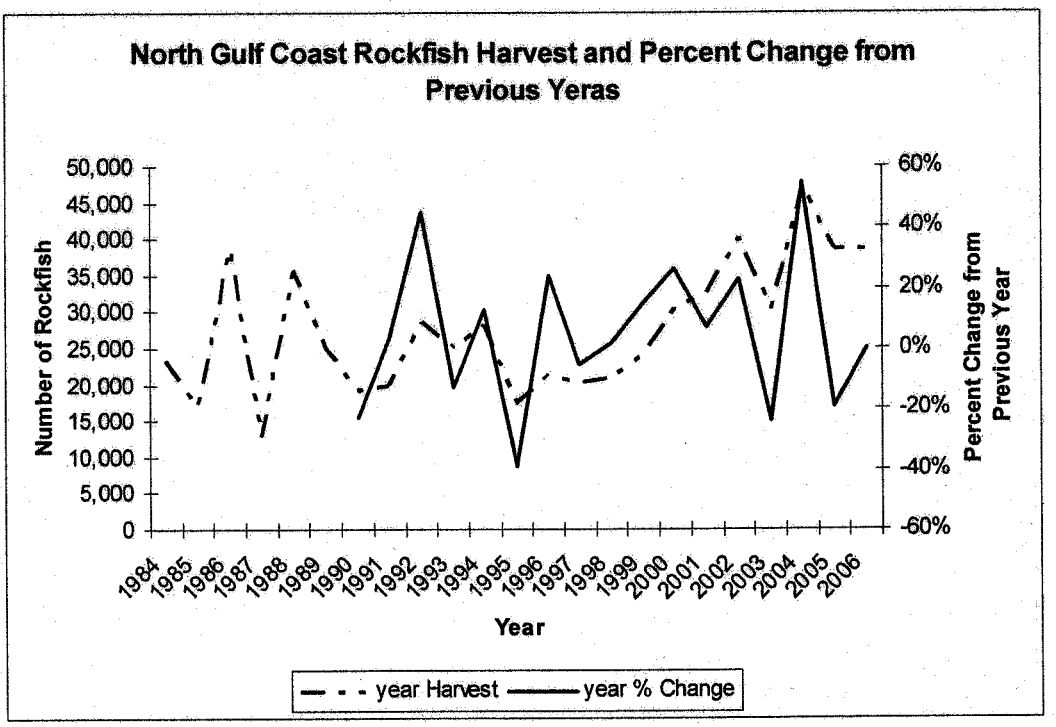


Figure 19D. The estimated harvest of rockfish in North Gulf Coast waters varies as much as +55% to -39% annually

19E

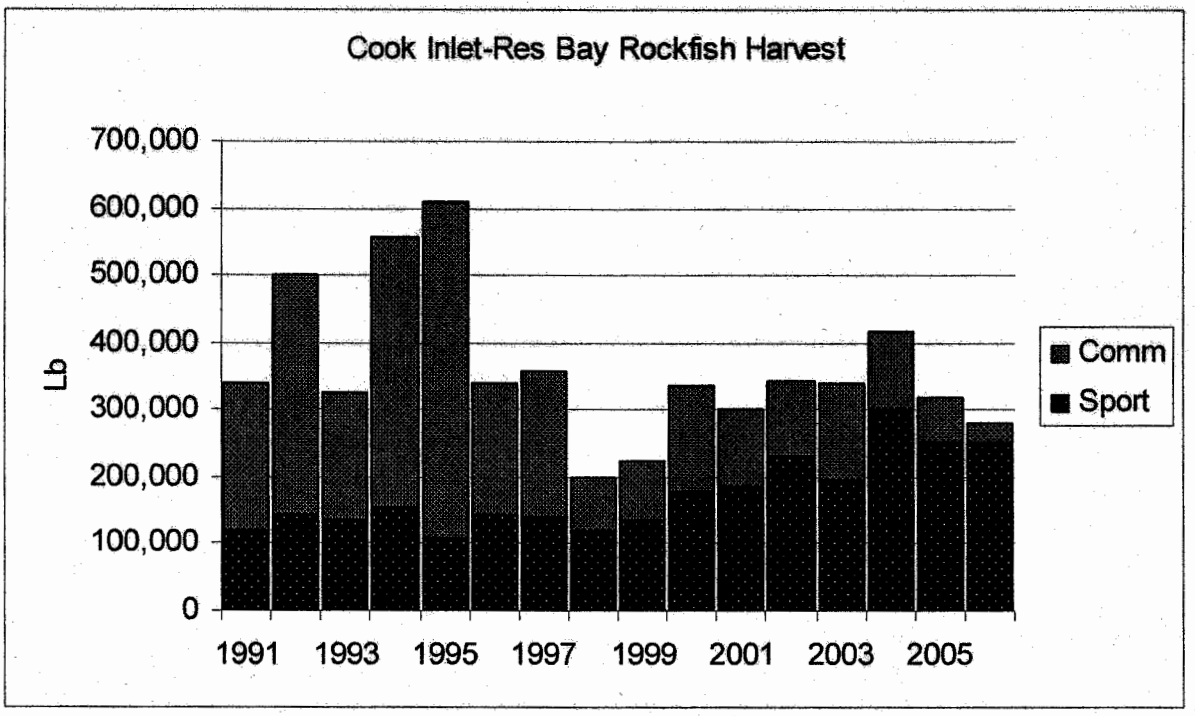


Figure 19E. Sport and commercial rockfish harvest in the Cook Inlet-Resurrection Bay Area, 1991-2006.

19F

Table 19F. Percent reduction in overall rockfish harvest associated with bag limit options, North Gulf Coast.

Bag Limit	2003	2004	2005	2006	2007	Average
4 fish	7.0%	5.8%	4.6%	4.8%	5.1%	**5.5%**
3 fish	18.2%	16.6%	12.5%	15.0%	15.1%	**15.5%**
2 fish	34.2%	32.2%	24.1%	28.9%	29.9%	**29.9%**

Table 20-21A.- Hatchery releases in Resurrection Bay from 1997-2007.

Stocking location	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007
Coho fry											
Bear Lake	448,700	409,000	306,000	316,000	310,000	404,700	404,800	406,000	400,500	447,300	520,900
Bear Creek											
Coho smolt											
Bear Creek	153,000	177,000	51,000	102,000	120,500	123,800	253,400	285,000	488,200	115,300	237,000
Lowell Creek	61,687	65,687	62,580	54,184	125,618	119,512	124,225	131,989	132,276	131,261	130,862
Seward Lagoon	144,112	74,365	109,142	145,693	124,703	121,743	123,718	131,798	132,229	131,326	132,811
Seward Sealife								192,000		146,100	
Chinook smolt											
Lowell Creek	117,208	101,992	85,502	109,461	114,748	93,296	110,331	89,388	100,088	0	0
Seward Lagoon	203,932	205,133	88,066	212,873	113,147	100,314	109,976	109,600	114,847	226,621	0
Seward Sealife								30,066	96,702	76,596	117,842
Sockeye fry											
Bear Lake	788,000	265,000	1,380,000	1,796,000	145,000	2,407,700	1,467,000	2,406,000	2,416,000	2,413,900	2,437,100
Sockeye smolt & Pre-smolt											
Bear Lake		506,703				802,600	334,000	603,000	1,005,700		
Bear Creek										979,200	618,900
Grouse Lake	2,428,000	1,514,000									
Rainbow trout catchables											
First Lake				1,000	1,000	1,007	1,427	955	760	405	0
Rainbow trout fingerling											
Lost Lake			42,802		25,000						
Arctic grayling carchables											
First Lake											478

Source: Marianne McNair, ADF&G, CFMD, Juneau; Jeff Hetrick and Robert Blankenship, CIAA, Trail Lakes Hatchery; ADF&G, Division of Sport Fish stocking records

21
B & C

Table 21B.- Resurrection Bay saltwater sport catch (1990-2005) and harvest (1990-2006) of sockeye salmon.

	Boat		Shore		Total	
Year	Catch	Harvest	Catch	Harvest	Catch	Harvest
1990	681	340	185	78	866	418
1991	536	464	692	519	1,228	983
1992	765	609	699	526	1,464	1,135
1993	1,693	1,353	666	512	2,359	1,865
1994	982	714	748	701	1,730	1,415
1995	616	482	833	812	1,449	1,294
1996	916	486	491	281	1,407	767
1997	1,094	569	1,447	1,217	2,541	1,786
1998	1,107	870	716	399	1,823	1,269
1999	870	805	280	259	1,150	1,064
2000	2,069	808	712	677	2,781	1,485
2001	1,580	998	374	265	1,954	1,263
2002	2,946	2,339	900	773	3,846	3,112
2003	1,865	1,437	938	640	2,803	2,077
2004	2,798	2,205	888	779	3,686	2,984
2005	3,320	2,768	2,960	2,692	6,280	5,460
2006	4,073	2,953	2,292	2,024	6,365	4,977
97-06	2,172	1,575	1,151	973	3,323	2,548

Source: Mills (1979-1994), Howe et al. (1995, 1996, 2001a-d), Walker et al. (2003), and Jennings et al. (2004, 2006a-b, In prep a-b)
1996-1999 estimates were recalculated due to error in original, published data analysis

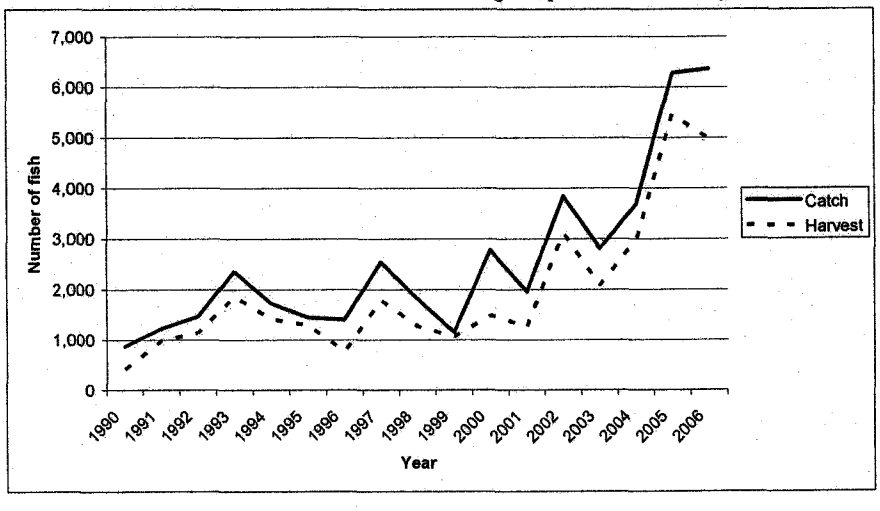


Figure 21C.- Total saltwater sockeye salmon harvest landed in the North Gulf Coast, 1990-2006.

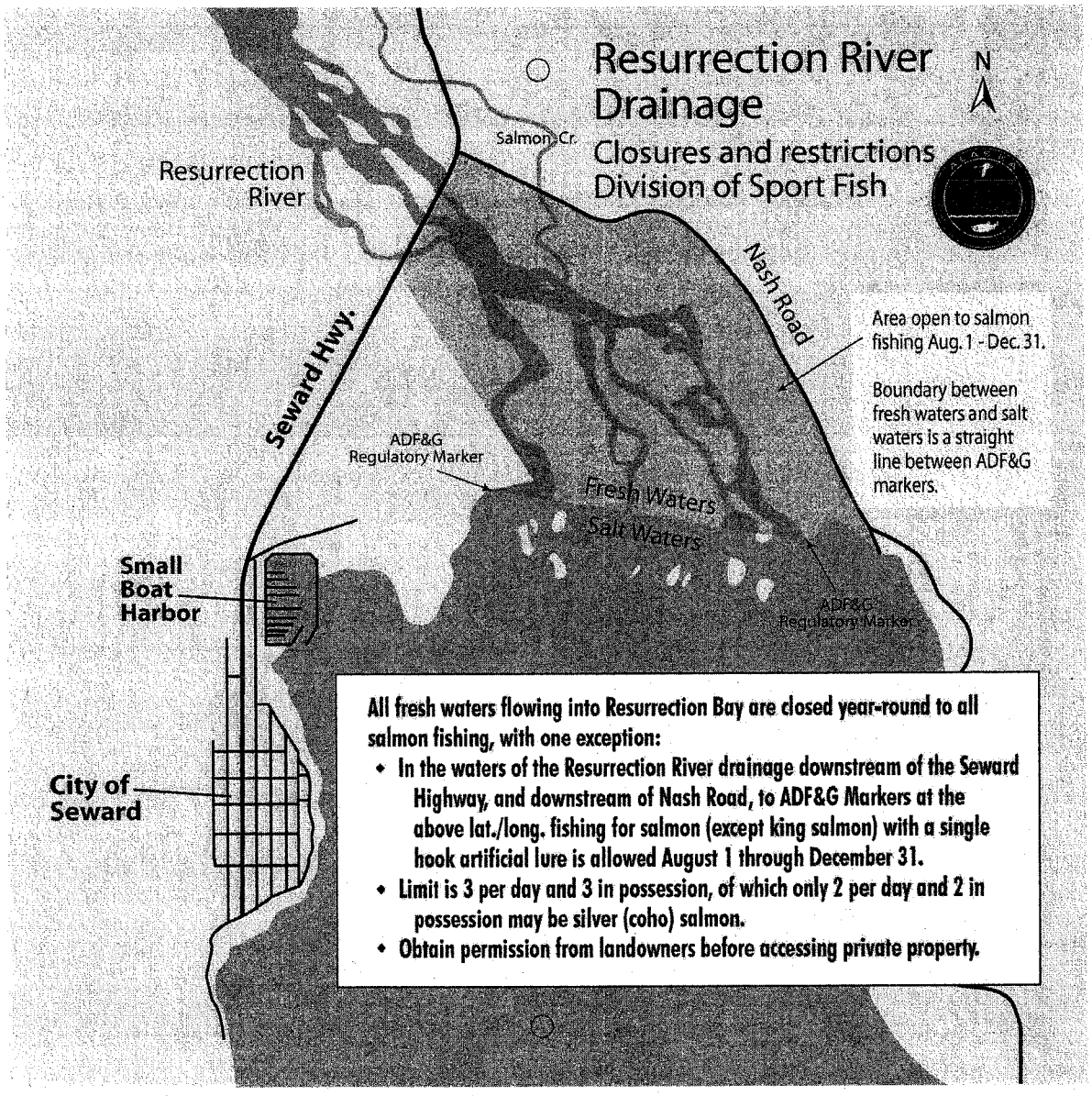


Figure 21D.- Map of Resurrection River drainage.

RC 13

King Career Center
Natural Resources Class
November 7, 2007

I was invited to provide an overview of the Board's process at the King Career Center, and while we talked about the process, the children in the class provided their comments on Proposal 20 – which deals with the youth fishery in the Seward Lagoon.

The following are notes taken during open class discussion, with the students written comments attached. The age range of participants was 14 – 18 year olds.

Alaska Board of Fisheries **Proposal 20**

Supporting comments (9 total) Kids need to have the experience of fishing. This allows a learning opportunity, a fun life event and also teaches good Alaska spirit – it's what we do here. This would protect children from combat fishing. There are some 7 year olds that are really good fishers, too. Not sure they agree with the age factor on how well they will do.

Opposing comments (5 total) This allows children to fish at the mouth where the fish flow into the lagoon. This should be from infant to 10 year old youth only. Others who are taking their time and effort to come and fish, may lose opportunity. Children and the adults could fish together, which would be more fun (example of the Campbell Creek youth fishery cited). Prefer families enter into a drawing so the entire family could fish. The artificial hooks is a problem. They should be able to use the same gear as an experienced fisher, so they can learn how to use the proper gear. Bait should also be real (no limit on gear).

Submitted by Sherry Wright, Regional Coordinator

11/4

Name: Jenny Wegener
Age: 16

Comment: This proposal would be a great idea because the kids need to have the experience of fishing too. It'd give them a learning opportunity as well as a fun life event. It gives a good Alaska Spirit!

Oppose: It wouldn't be a good idea if the children weren't properly supervised. They should be able to have families reserve a time in a day to just fish with their family only.
They should be able to experience the whole fishing process, to use just as much equipement as experienced fishers.

Joseph Predmore

Age 18

I think the proposal is wrong to give a child 15 and younger the chance to fish in

Katherine E. Sirois

agree	disagree
• childern learn on their own.	• could use help From more experiment people.
• hang out with their own age group	• they don't know the rules and they need help.
• Intimadated by older people	• they might cause harm to others
• No compat fishing	• Might need supervison

Jacob Thompson 17 years-old KCC Natural Resource Class

I disagree with this proposal for one main reason. first I disagree with this proposal because 11 through 15 year-olds could fish pretty well if they're going fishing

Daniel COX
17 yrs

~~I~~ I support the fact of Snagging should not be allowd because more and more fish would gone and the population may run low, and in fact of fish only the Single Artificia Hook should be used, so that kids can have some kind of experience with this.


Oppose, youth dont have to have a Permit to fish, they can fish with adults. It would be very nice for kids to have fun tying to fish but what about the adults that want to fish in the time period during the children's fishery.

The kids can fish with the adults and the adults can help, it'll be funner (more fun) :)

Zoe Ihitskaya

11/07/07

Donald 14

That is a good Idea because It gives Kids chances to catch Fish with out combat Fishen and it might help more Fish come in and out OF there.

Adriana Briseno
17 years old

I totally agree with Proposal 20. I think it would be a good idea to have an all children's fishery, they have good memories and just be fun. There children it's a good spot to learn how and ~~how to learn~~ meet other children.

I Support This Proposal

Because This would not only give Kids the opportunity Learn how to Fish and area.

I support the proposal, because I thinks it's good for youth fishers to get to learn how to fish at a young age.

I agree this proposal.

RC 14

UNITED FISHERMEN OF ALASKA

211 Fourth Street, Suite 110
Juneau, Alaska 99801-1172
(907) 586-2820
(907) 463-2545 Fax
E-Mail: ufa@ufa-fish.org
www.ufa-fish.org

November 10, 2007

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

Dear Chairman Morris:

During the December 4-12, 2006 regularly scheduled Board of Fish meeting in Dillingham, proposals 15, 21 and 39 were "tabled to board restructuring committee; with possible action next cycle". While proposal 39 requesting repeal of the 32-foot vessel length limit for the Bristol Bay drift fishery was controversial, industry clearly expected that further consideration would take place through a timely and open restructuring process. The other two proposals, both relating to 'permit stacking', were cleared for board action by industry-supported legislation HB 251, passed into law in 2006. Although United Fishermen of Alaska (UFA) carefully monitors actions taken and the processes used by the Board to develop policies and regulations, we are unaware of any activity by the restructuring committee other than naming members. In spite of BOF discussion of additional restructuring proposals in other areas of the state, a review of the BOF web site reveals little or no substantive information about the progress of <u>any</u> restructuring proposal.

Realizing that a competitive world market requires a responsive regulatory system that can deal with restructuring issues in a timely and public fashion--as the Legislative Salmon Task Force did in funding the Board of Fish Restructuring Panel, it is crucial for the Board of Fish to follow through. At this point, it is unclear whether the there is any utility in the restructuring process other than for the board to sidestep consideration of issues that appear to be controversial. To date, it is the collective belief of the UFA board that the restructuring committee and process seems only to resemble a 'black hole' rather than a functional tool that can address industry needs.

Given the critical importance of a responsive regulatory process, UFA is requesting that the Board either act on restructuring proposals in a timely, effective and public manner or scrap the process and committee altogether in order to make way for an alternative means of dealing with issues responsibly.

UFA is an umbrella organization representing 36 Alaska commercial fishing associations, participating in fisheries throughout the state and its offshore waters. We appreciate your consideration of our comments on this matter, and your service on the Board of Fisheries.

Sincerely,

Mark Vinsel
Executive Director

CC: Denby Lloyd, Commissioner, Alaska Department of Fish and Game
Cora Crome, Office of Governor Sarah Palin

RC 15

RECEIVED
NOV 0 8 2007
BOARDS

Juneau Douglas Fish and Game Advisory Committee
Kathy Hansen, Chair
9369 North Douglas Hwy
Juneau, AK 99801

November 8, 2007

Alaska Department of Fish and Game
Boards Support Section
Board of Fish, Mel Morris, Chair
PO Box 25526
Juneau, AK 99802-5526

RE: Board Generated Proposals from Oct Work-session

The Juneau Douglas Fish and Game Advisory committee met on November 7th. At the end of the meeting we discussed the 7 board generated proposals that are listed on the summary of board actions from the October work-session. We would like to point out that our advisory committee has still not received any official notification of these proposals existence. We are expressing our opposition to proposals that are generated at the work-session, with a comment deadline 2 weeks later and action scheduled for mid-November. This is an unacceptable timeline for pubic notification and for advisory committee participation in the process. We also believe that board generated proposals need to be submitted during the regular timeframe for proposals or submitted as agenda change requests (ACR) and the criteria for ACR's used to determine the appropriateness of the proposal being considered out of cycle. We feel these proposals have been handled with no consideration of the importance of the advisory committee system.

Sincerely,

Kathy Hansen
Chair, Juneau Douglas Fish and Game Advisory Committee

RC16

KENAI AREA FISHERMAN'S COALITION

PO Box 375 Kenai, Ak, 99611 * (907) 283-1054 * dwimar@gci.net

Comments on Lower Cook Inlet Fishery Proposals and Issues

Anchor River Escapement Goal Input:

ADF&G has recommended an SEG threshold for the Anchor River of 5000 Chinook. We think that this new threshold type, which is not defined in the Sustainable Salmon Fishery Policy, should not be applied to this river. ADF&G reported that data are available to set a BEG or SEG range, and we support the range of 3400 to 6800 fish provided in the stock status report as a start for discussions (Fishery Manuscript No 07-05). We do have some concerns about the limited data set, and therefore a higher upper end may be more appropriate.

If the Board feels that non-biological issues are important then an OEG range should be set that takes into account those concerns.

We understand that ADF&G intends to bring this issue to the Board. We support and appreciate ADF&G efforts in this matter and welcome that discussion on the record.

Our position is that ADF&G should have the flexibility to manage to this range via emergency order authority using time, area, and bag limit adjustments

Comments on Lower Cook Inlet Proposals:

1-2. Oppose. We support ADF&G efforts to add to the exploitation rate by giving additional fishing time within the currently defined season dates and suggest that it be in the form of one additional day per week.

3. Oppose. We support ADF&G efforts to add to the exploitation rate by giving additional fishing time within the currently defined season dates.

4. Oppose. We support the ADF&G position to increase harvest in the Anchor River and agree that no additional harvest of Deep Creek Chinook salmon is warranted

5. Oppose.

6. Neutral. The dept is neutral and believes that if passed, there will be no measurable increase in the harvest of Anchor River bound Chinook salmon.

7. Oppose. We support the ADF&G position to increase harvest in the Anchor River by providing an additional day of in-river fishing within the currently defined season dates. We oppose a liberalization of the marine fishery by reducing the sanctuary area for the entire season.

8-9. Oppose. As in Proposal 7, we oppose a liberalization of the marine fishery by reducing the sanctuary area for the entire season. We agree that no additional salt water harvest of Ninilchik River or Deep Creek Chinook salmon is warranted

10. Support. This proposal puts current Dept. Emergency Order strategy into regulation.

RC17

-----Original Message-----
From: "ADMIN" <sea.venture@amosconnect.com>

Date: Mon, 12 Nov 2007 19:35:21
To:"Dan Gunn" <dancatchcrab@aol.com>
To the board of Fisheries

Dear sirs. My name is James Pennington captain of the F/V Sea Venture a 104 foot vessel that participates in the BSAI state water pot cod fishery and IFQ/CDQ Sablefish fishery. My letter is in concern for the proposal to limit the size of vessels in the BSAI state/water p-cod/pot fishery in Adak to 60 feet and under. If I may please let me tell you a little bit about myself and the Sea Venture. I have been a registered voter in Adak for over 2 years, currently seeking to purchase a residence there. The Sea Venture delivered over 1/2 a million pounds of p-cod to Adak last year, and somewhere in the same vicinity of sablefish the year before. We have also prior to the last 2 years made deliveries of red king crab and sablefish to Adak. We hire local Adakian and Dutch Harbor fisherman and non fisherman first and foremost before flying in any outside help and currently have on the vessel Daniel Thompson an Alaska Native and resident of Adak as well as 2 locals from Dutch Harbor. Dan has worked for me on the Sea Venture off and on for over a year and probably will continue to do so. We purchase groceries in Adak, rent vehicles in Adak, are regular patrons of the restaurants in Adak, buy fuel in Adak and however and whenever trade with any and all local businesses in Adak. The Sea Venture many times has brought to Adak free of charge automobiles and misc/freight for the citizens and businesses of Adak. I also could go on and on about how we have spent millions of dollars on the Sea Venture for these particular fisheries and that I myself have fished in AK for over 20 years, that 65% or more of our income will come from this state water fishery this year as we are out here fishing as of this moment, and that I am currently engaged in becoming part owner of the Sea Venture but I hope I have already made my point. I consider myself an Alaskan, I spend my money here, I pretty much reside here and it would hurt Me, my boat, my crew and Adak if we were no longer allowed to go to work on the ocean. Just a couple other points I would like to make one is that in the proposal it paints a picture of the over 60 foot boat as being the spoiler that comes along and decimates the quota at a rate much faster than the small boat operator, this cannot be because no matter how big the boat he can only haul one pot at a time the same as the little boat, whether longlining or single pot fishing all boats are equal when it comes to hauling gear. My second point dear sirs is that Iam no longer 18 years old. Iam 48 and some of my crew are not so young either, those smaller boats are for the young guys to go rock and roll around on out here, come on out I invite you to come see! Just kidding and hope you will please consider the Sea Venture and all those we touch in our endeavor to make an honest living. sincerely James Pennington. 11/12/07

RC 18

November 12.2007

ATTN: Board of Fish Comments
Alaska Department of Fish and Game
Board Support Section

Re: Proposal 397

Dear Board Members:

The Captian, crew and owners of the F/V Sea Venture would like to express our opposition to Proposal 397. If adopted, Proposal 397 will cause severe financial hardship for our vessel and its crew. Compitition in the Aleutian Island area would be reduced in the harvesting and buying sectors. Vessels currently working in the fishery would be eliminated in the hope of attracting under 60' vessels. Many years of experiance in this area has taught us that even with vessel our size, it is a very difficult place to work and with its extreme weather, tidal and current conditions it is a very **dangerous** place for small boats, especially small pot boats, to work.

The Sea Venture is a 104' pot longliner that has been fishing in the Western Aleutians for Pacific Cod and Sablefish .We recently added (at great expense) an H&G freezer factory to the vessel. We made these changes so that under the current State Aleutian Islands Pacific Cod Management Plan we could work anywhere in the AI State Water district and realize the greatest possible value from the fishery by produce the highest quality frozen at sea product. Being a pot catcher vessel we utilize a very selective gear type that has very little bycatch and little or no impact on the marine ecosystem and bottom terrain. Our vessel is limited to a maximum harvest capacity of 75,000 lbs. roundweight cod due to its limited freezing capacity. This is well below the daily catch limit of 150,000 lb. in the current management plan which coincides with the Board of Fish's objective of a slower paced fishery. .

We are providing economic support for the community and small businesses in Adak. Almost every trip that the vessel has made in the AI district the boat has stopped in Adak and we have purchased supplies, food, fuel , bait and expediting services. The crew has spent money at the local restaurants, stores and and bars. We have transported frieght, trucks, propane tanks and other materials to and from Adak for residents free of charge. We are a relatively small vessel with limited holding capacity , so it would be very advantages for us to be able to offload in Adak.

The Sea Venture's Captain, is a registered voter in Adak and has been fishing the Bering Sea and Aleutian Islands for over 20 years. Most of our crew is recruited in Adak and Dutch Harbor, about 30-40% are Aleut and 1 lives in Adak. About 65% of the vessel and crew's income this year will be derived from the State Water fishery and it is very important to us! Loss of this fishery would have a substantially damaging impact on these individuals and their families' income as well as other participants.

We are concerned that limiting the vessel size to 60' will result in a fishery that will only be exploited in a small area close to Adak creating a potintial for localized depletion of the stocks. Quotas are based on stokes distributed throughout the Aleutian Island district west of 170 degrees and unnessecarily limiting the take to a small area is not a good idea. The Sea Venture, as a catcher/processor, has the ability to stay at sea for up to 60 days enabling it

to work anywhere in the district that we can find fish.

Proposal 398
We are opposed to Proposal 398. The seasonal allocations should remain the same for Stellar Sea lion conservation.

Proposal 399
We support Proposal 399. The increased tunnel size would allow the catch of larger size cod more valuable in the market places and harvesting the older cod is beneficial. For the natural mortality rate is greater for these older cod fish which would be a lost resource. We have experiance a very low ocurance of bycatch in the AI area and do not believe that bycatch with larger tunnel openings will be a problem.

Thank you very much for your consideration.

Sincerely,

Daniel Gunn
F/V Sea Venture

EDWARD "BUSTER" SHIASHNIKOFF
Unalaska, Alaska

RC 19

November 12, 2007

State of Alaska Board of Fisheries

Dear Board Members:

I strongly OPPOSE proposals 397 and 398.

I am an Aleut native, born in Unalaska and am a current resident. I have been an active participant in the Sate of Alaska Bering Sea and Aleutian Islands fisheries these last 40 years as a Captain of vessels ranging from 50 feet to 180 feet.

I have fished the Aleutian Islands in a 60 foot vessel and found it very difficult and dangerous because of the weather, current and tidal conditions. I feel that a 60 foot vessel is too small

I am now the Captain on the F/V *Katmai*, a 93 foot catcher processor, and have been active in the vessel's conversion to a Pot Cod catcher processor preparing to fish the State water fishery in the Aleutian Islands.

These proposals, if adopted by the Board, would eliminate the *Katmai* from entry into the State water fisher which would result in severe financial impact for myself, my crew and our Alaskan families.

Sincerely,

Edward "Buster" Shiashnikoff
Captain, F/V *Katmai*

c:\katmai\Buster11-12-07

MARTIN MORIN

RC 20

NOVEMBER 11, 2007

All ALASKAN SEAFOODS

F/V KATMAI

TABLE 1 : National Marine Fisheries Service

Aleutian Cod Biomass

FIGURE 1 : National Marine Fisheries Service distribution and relative abundance of pacific cod from the 2006 Aleutian Islands trawl survey

Proposal 397 - OPPOSE

This proposal, if adopted, will cause severe financial hardship for our Alaskan owned catcher processor F/V Katmai. The Katmai , a 93 ft. catcher/processor vessel, was originally designed and utilized for shellfish. The most recent fishery the Katmai participated in Alaska was a shrimp pot fishery in western Alaska. A lack of history in the federally managed groundfish fisheries provides the Alaska owners of the vessel scant opportunities in alternate fisheries.

Following the adoption of the current State Aleutian Islands Pacific Cod management plan we developed a business plan that centered on a vessel conversion to a pot cod catcher/processor to specifically fish state waters for Pacific cod in the Aleutian Island District. This investment anticipated that we would commence fishing in January 2008. Only three weeks ago we learned of this proposal which will negate all of the time and money that we invested to participate in this State water fishery. The loss of entry into this fishery may force foreclosure of our vessel due to the limited options currently available to us.

The state has identified these overarching goals for its fisheries.

1. Obtaining optimum sustained yield while minimizing adverse impacts on the marine ecosystem.

The Katmai being a Pot Cod catcher vessel has a very selective gear type for target species and any by catch is relatively low when compared to other gear types, also has little or no impact on marine ecosystem and bottom terrain.

2. Realizing the greatest value from the fishery and providing economic opportunity and community stability.

The Katmai being a catcher/processor is able to produce a quality product that receives a higher value in the marketplace. The Katmai having a limited capacity for product storage, fuel, and other supplies, needs the support of Adak to meet these needs. Prior to my knowledge of this proposal I had contacted Adak Commercial Properties, which is part of Aleutian Enterprise L.L.C. To discuss the support facilities that are available in Adak i.e. cold storage, fuel, storage rental space, repair facilities, etc. It is our intent to use Adak as our logistical Homeport in the Aleutian Islands, which would provide more economic opportunity for Adak.

3. Bringing the greatest share of that value to Alaskans and Alaska.

The Katmai's Captain, an Aleut, resident from Unalaska, has 40 years of fishing experience in the Aleutian Islands and the Bering Sea; and three others current crew members are native residents. Loss of entry into this fishery would have a substantially damaging impact on these individuals and their families' income as well as other participants.

Harvest Rate

The 7 pot catcher vessel that operated in the state waters A season were vessels greater than 60 ft., there was no participation of catcher vessels less than 60 ft. It is difficult and dangerous for vessels less than 60 ft. to fish pots in the Aleutian Islands due to limited deck space, stability issues, harsh weather and tidal activity in the Aleutian Islands. Limiting size of vessels to 60 ft. would be a safety issue. The fisheries rationalization plan in the Bering Sea was adopted to help insure safety at sea.

The harvest of the 7 pot catcher vessel caught only 15% of the A season harvest. Our vessel is limited to a maximum harvest capacity of 40,000 lbs. round weight cod due to its limited freezing capacity. This is well below the daily catch limit of 150,000 lb. in the current management plan which coincides with the Board of Fish's objective of a slower paced fishery.

There is also a biological concern for limiting the vessel size to 60 ft. Cod is distributed throughout the Aleutian Island district west of 170 degrees as can be seen from figure 1 and table 1 produced by N.M.F.S. summer trawl survey of the Aleutian Islands. The Aleutian Islands extends 1200 miles west of 170 degrees W. Effort in the cod fisheries has been concentrated approximately within 150 miles of Adak covering about 25% of the Aleutian District. Limiting the size of vessels to 60 ft. due to constraints of distance to market, weather conditions and re supply support would increase the concentration of localized effort near Adak. This could cause the localized depletion of the cod stocks. It is well understood in fisheries management that harvest should be conducted throughout a district to avoid the problem of localized stock depletion. The Katmai, a catcher/processor, has a 30 day at-sea duration and an ability to harvest cod fish throughout the Aleutian Islands. Fishing in areas that have not been traditionally fished would provide additional information to biologist on the seasonal distribution of cod throughout the district as well as the potential of finding additional resources and exploitation potential.

The Katmai does not have a ground fish L.L.P. for Alaska; an L.L.P for a 93 ft. catcher/processor vessel is currently unavailable, and we are actively seeking an L.L.P that

matches the Katmai economic profile in order to develop all the opportunities we can for our vessel if unable to participate in the State Waters as we invested in. Without a groundfish L.L.P. we have a very poor outlook if the BOF approves this proposal.

Proposal 398 - OPPOSE

The seasonal allocations should remain the same for Stellar Sea lion conservation. The B season is also a slower paced fishery contrary to the faster paced A season. The slower paced B season allows fisheries to exploit areas that are more distant rather than the more traditional fishing areas, and harvest fish in the district not traditionally fished, helping to minimize the potential for localized depletion of cod stocks.

The proposal if adopted may potentially cause the entire GHL harvest to be taken in the A season leaving no allocation for the B season. The management should insure fisheries in the non-spawning period to spread out harvest to exploit evenly in both space and time.

The B season Sept. 1 trigger should remain the same for pot catcher vessels greater than 60 ft.

Proposal 399 – SUPPORT

The increased tunnel size would allow the catch of larger size cod more valuable in the market places and harvesting the older cod is beneficial. For the natural mortality rate is greater for these older cod fish which would be a lost resource.

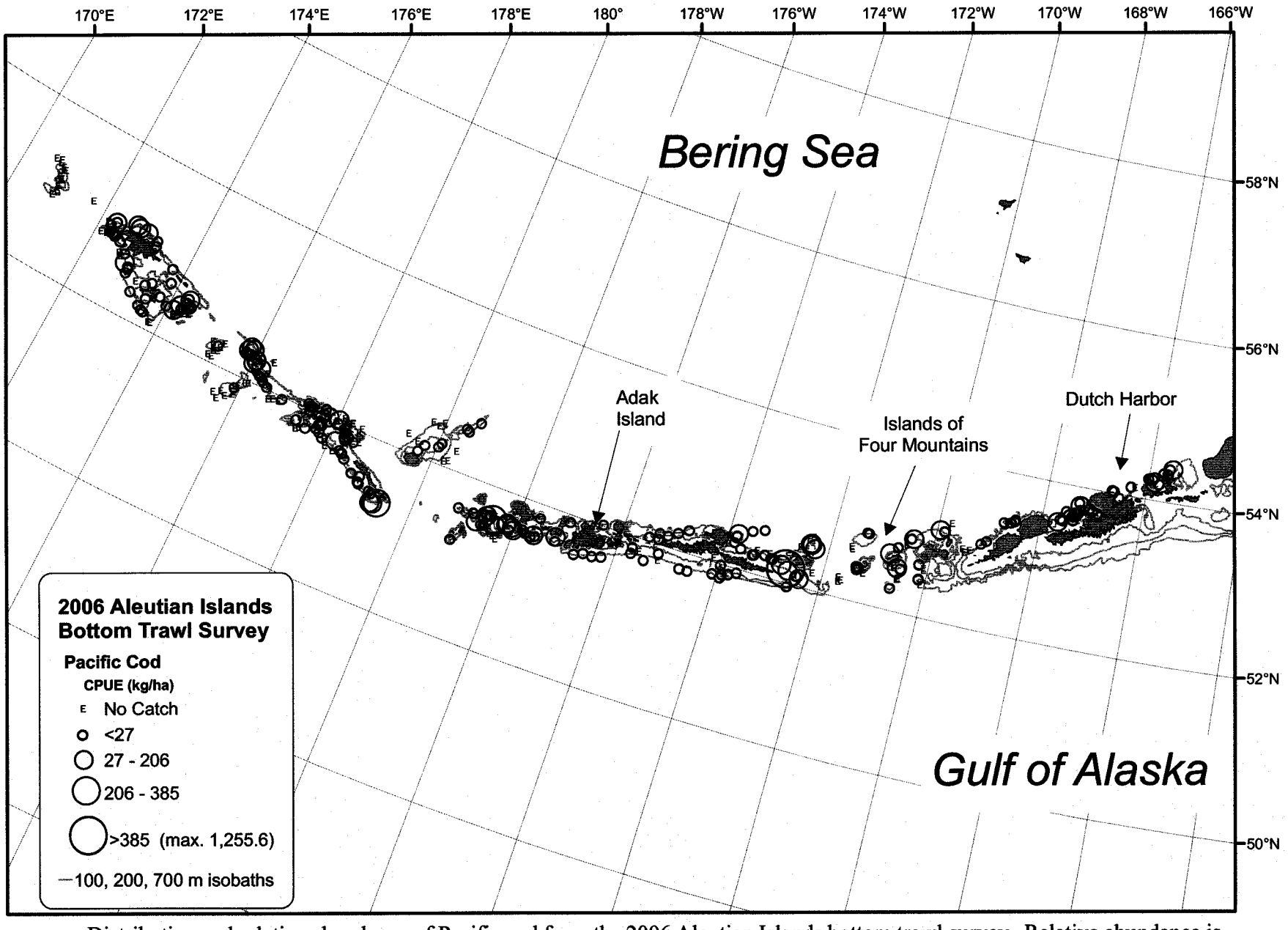


Figure xx.--Distribution and relative abundance of Pacific cod from the 2006 Aleutian Islands bottom trawl survey. Relative abundance is categorized by no catch, sample CPUE less than the mean CPUE, between the mean CPUE and two standard deviations above the mean, between two and four standard deviations above the mean, and greater than four standard deviations above the mean.

Aleutian Cod Biomass

YEAR	SURVEY	SPECIES CODE	SUMMARY AREA DEPTH	INPFC AREA	MININMUM DEPTH (m)	MAXIMUM DEPTH (m)	HAUL COUNT	CATCH COUNT	AREA BIOMASS (metric tons)	MEAN WGT CPUE (kg/km^2)	MEAN NUM CPUE ($number/km^2$)
2002	AI	21720	791	Southern Bering Sea	1	100	30	30	6758.1	1678.65114	755.2322558
2002	AI	21720	792	Southern Bering Sea	101	200	16	16	1379.7	746.3823334	464.7371403
2002	AI	21720	793	Southern Bering Sea	201	300	7	7	1237.7	2195.1	836.9
2002	AI	21720	794	Southern Bering Sea	301	500	8	4	225.5	216.1	62.9
2002	AI	21720	5691	Eastern Aleutians	1	100	16	11	4280.8	625.1319793	854.7461172
2002	AI	21720	5692	Eastern Aleutians	101	200	47	32	18231.4	2346.961504	731.8447238
2002	AI	21720	5693	Eastern Aleutians	201	300	42	22	2534.5	517.0764337	196.504758
2002	AI	21720	5694	Eastern Aleutians	301	500	27	2	193.9	34.14950473	13.55482517
2002	AI	21720	3491	Central Aleutians	1	100	30	26	12517	2140.645594	582.1767444
2002	AI	21720	3492	Central Aleutians	101	200	45	40	11333.2	2460.69088	653.8939343
2002	AI	21720	3493	Central Aleutians	201	300	23	14	477	226.2170861	84.92832942
2002	AI	21720	3494	Central Aleutians	301	500	17	0	0	0	0
2002	AI	21720	291	Western Aleutians	1	100	26	13	9213.5	1889.33442	697.8909807
2002	AI	21720	292	Western Aleutians	101	200	51	29	14403.2	2708.521569	635.9642679
2002	AI	21720	293	Western Aleutians	201	300	19	6	184.8	107.2518123	42.15715163
2002	AI	21720	294	Western Aleutians	301	500	13	0	0	0	0
2004	AI	21720	791	Southern Bering Sea	1	100	33	25	14063.2	3493.183959	769.9794522
2004	AI	21720	792	Southern Bering Sea	101	200	8	8	15307.5	8280.418171	1768.991305
2004	AI	21720	793	Southern Bering Sea	201	300	4	4	2329.5	4131.3	1324
2004	AI	21720	794	Southern Bering Sea	301	500	8	3	264	253.1	88.4
2004	AI	21720	5691	Eastern Aleutians	1	100	15	10	6780.5	990.1509727	501.7838735
2004	AI	21720	5692	Eastern Aleutians	101	200	42	31	38799.1	4994.666081	961.3151697
2004	AI	21720	5693	Eastern Aleutians	201	300	33	24	5890.7	1201.877013	410.270865
2004	AI	21720	5694	Eastern Aleutians	301	500	22	3	381	67.0471645	22.13841833
2004	AI	21720	3491	Central Aleutians	1	100	31	23	10470.5	1790.645023	474.0079006
2004	AI	21720	3492	Central Aleutians	101	200	48	43	9105.8	1977.095822	544.9824262
2004	AI	21720	3493	Central Aleutians	201	300	31	19	974.7	462.2192935	191.934922
2004	AI	21720	3494	Central Aleutians	301	500	21	2	157.8	39.64489096	15.42275044
2004	AI	21720	291	Western Aleutians	1	100	23	12	3039.3	623.2010208	134.5913131
2004	AI	21720	292	Western Aleutians	101	200	62	37	6425.7	1208.387027	461.0221101
2004	AI	21720	293	Western Aleutians	201	300	25	7	172	99.83345018	65.18597529
2004	AI	21720	294	Western Aleutians	301	500	14	0	0	0	0
2006	AI	21720	791	Southern Bering Sea	1	100	21	18	3062.6	760.6936195	300.986958
2006	AI	21720	792	Southern Bering Sea	101	200	11	11	2205.6	1193.083151	615.0892684
2006	AI	21720	793	Southern Bering Sea	201	300	4	4	1617.1	2867.9	792.5
2006	AI	21720	794	Southern Bering Sea	301	500	8	4	525	503.3	198.6

Aleutian Cod Biomass

YEAR	SURVEY	SPECIES CODE	SUMMARY AREA DEPTH	INPFC AREA	MININMUM DEPTH (m)	MAXIMUM DEPTH (m)	HAUL COUNT	CATCH COUNT	AREA BIOMASS (metric tons)	MEAN WGT CPUE (kg/km^2)	MEAN NUM CPUE ($number/km^2$)
2006	AI	21720	5691	Eastern Aleutians	1	100	12	5	710.1	103.6848169	63.51143618
2006	AI	21720	5692	Eastern Aleutians	101	200	31	28	35431.9	4561.205081	848.2966623
2006	AI	21720	5693	Eastern Aleutians	201	300	27	22	7069.6	1442.339596	369.0386746
2006	AI	21720	5694	Eastern Aleutians	301	500	21	3	137.3	24.16037476	8.606861932
2006	AI	21720	3491	Central Aleutians	1	100	32	30	12954.8	2215.496072	580.4428121
2006	AI	21720	3492	Central Aleutians	101	200	35	30	7974.1	1731.408225	531.3744983
2006	AI	21720	3493	Central Aleutians	201	300	21	15	1103.9	523.5048273	231.2768998
2006	AI	21720	3494	Central Aleutians	301	500	22	0	0	0	0
2006	AI	21720	291	Western Aleutians	1	100	22	13	7712.6	1581.564828	745.2681068
2006	AI	21720	292	Western Aleutians	101	200	47	31	11182.8	2103.001116	468.2924983
2006	AI	21720	293	Western Aleutians	201	300	23	13	838.7	486.5572437	227.6783947
2006	AI	21720	294	Western Aleutians	301	500	21	0	0	0	0

WHY PROPOSAL #10 WON'T WORK

By Jim Stubbs

RC 21

1. In 2007 SEG was not met!
   - SEG is 550-1300.
   - Low end was not met.
   - Why would you go from three days per week to seven days per week if SEG is not being met?

2. The proposal is flawed because of the following:
   - The percentage of Hatchery Kings is lowest in the month of May and June and highest in the month of July.
   - Extra days of fishing in May and June when Hatchery King numbers are at their lowest. This caused Wild Kings and Steelhead to be needlessly and repeatedly hooked, greatly increasing the chance of mortality.
   - Annual harvest from 1999-2006 as compared to 2004-2006 when extra days of fishing for hatchery Kings were added have not shown to solve the so called problem of surplus Hatchery Kings.

3. Riparian habitat is being impacted as the trail fishermen use to travel up and down the river is caving into the river in some areas.

4. A decrease in the quality of the fishing experience.

5. Changes the fishery from Alaskan based harvest for their own freezers into a tourist based harvest which will leave the state.

6. Increases guiding pressure on a very small stream.
   - No one wants to see all the problems of the Kenai and Kasilof Rivers brought to the Ninilchik River.

7. Increases illegal harvest of Wild Kings and Steelhead.
   - Lack of enforcement
   - Frustration of fishermen unable to land a Hatchery King, catch and release one Wild King after another, then illegally retain a Wild King.

8. A weekend fishery stacks up more fish in the river, resulting in more fishermen on the stream, thus more fish harvested. Seven day per week fishery pushed fish rapidly upstream pass the two mile boundary causing less fish harvested.
    - Less fishermen on the Ninilchik River equal less fish caught, less hatchery fish harvested.

9. Seven day per week fishery moves Ninilchik River users to Deep Creek and the Anchor River. Both streams are already crowded.

10. Fishermen spill over to Deep Creek which is less than a mile away. Lack of enforcement and signage cause illegal King fishing with harvest and mortality the result. Deep Creek's SEG is the weakest of the lower Inlet streams.

11. The 2007 fishing effort concentrated the effort on Wild Kings and post-spawn outmigrating Steelhead. The percentage of Hatchery Kings were at their low point in May and June and increased to their peak in July. Fishing for Hatchery Kings should therefore be limited to July only.

12. Lack of Hatchery Kings in May and June.
    - In 2007 I fished 25 days of the 51 day season. I hooked:
        a. 39 Wild Kings
        b. 1 hatchery King
        c. 52 Steelhead
    - In 2007 Allen from the Ninilchick State Campground hooked:
        a. 66 Wild Kings
        b. 4 hatchery Kings
    - Also in 2007, Old Bill from Ninilchick hooked:
        a. 44 Wild Kings
        b. 6 hatchery Kings

13. The percentage of <u>Hatchery to Wild Kings</u> hooked tells the tale! Seven days per week is not the answer until July 1st. The percentage of hatchery fish according to the Department is the highest in July. Their test netting shows May and June are not the time to be increasing the fishing effort which hammers the Steelhead and Wild Kings in May and June.

HOW TO MAKE PROPOSAL #10 WORK

By Jim Stubbs

Option #1 Stop enhancement of the King fishery. Wild Kings and Steelheads should come before hatchery fish. If there is a concern between hatchery-wild smolt interactions, as the department has stated, simply eliminate the hatchery component and put the wild stocks back to their deserving #1 status. The native fish deserves nothing less!

Option #2 Continue the current regulation of Memorial Weekend and the following two weekends and the Monday following each of those weekends.

Option #3 Same as Option #2, but add seven days per week for hatchery Kings beginning on July 1 – December 31.

- This would allow post-spawn Wild Steelhead to outmigrate to the Inlet and Wild Kings to move upstream to their spawning grounds.
- Would give the river back to hard working Alaskans that can only fish on weekends.
- Weekend openers would give Alaskans the opportunity to harvest Kings for their personal consumption.
- Would concentrate the fishing effort on hatchery Kings in July when the percentage of hatchery vs. wild is at its highest.
- Would eliminate Wild Kings and Steelhead from being repeatedly hooked and released by fishermen hoping to land a Hatchery King when the percentage of hatchery fish are at their lowest number..

RC 22

State of Alaska
Department of Public Safety
Division of
Alaska Wildlife Troopers

Sarah Palin, Governor
Walt Monegan, Commissioner

410 Adams Street, Suite 204
PO Box 817
Seward, AK 99664
(907) 224-3935 Telephone
(907) 224-2446 Facsimile

10/17/07

To Whom It May Concern - Board of Fish:

The local Seward Fish and Game Advisory Board are preparing to forward a proposal (Prop 21) that would open lower Salmon Creek to the taking of Sockeye Salmon.

From an enforcement perspective, I would support this proposal for two main reasons. First, these fish are routinely harvested illegally... mostly by the locals who live on or near the river. Opening an opportunity to harvest these fish legally would significantly mitigate the level at which active poaching occurs. I truly believe that given the opportunity to take sockeye legally, most will conform to the regulatory requirements and take the fish in a lawful manner. I believe this due to the fact that lower Resurrection River and Salmon Creek were formerly closed to the taking of all salmon, particularly Silver Salmon and was recently opened for legal harvest. What this accomplished was two fold; people who used to violate a closed area now use the opportunity to take fish legally and follow the regulations. I have yet to write a citation on this fishery for over bag limit or gear restrictions.

Second, I believe that additional legitimate anglers on this stretch of river will reduce violations simply by their presence and the willingness of the public to turn in violations. Some of the best cases I've had in my career stem from a simple tip from the public.

These red salmon are essentially a common property resource with two user groups that dominate the majority of utilization... Cook Inlet Aquaculture and Commercial Fishermen. A third user group, being the sport fishermen, have a small opportunity to snag these fish in the saltwater snagging area listed in the sport fishing regulations. This is a somewhat limited opportunity with a very wide range in success rates. I believe however, that the majority of sport caught sockeye that are taken out of the river do not come from this saltwater section, but from the upriver

section where it is illegal to fish for red salmon during the months of May, June, and July.

This is simply an allocative issue for all resource users that needs to be evaluated to permit a legitimate harvest of fish in a public use area. I would support a newly developed fishery in the Seward region and could easily justify and dedicate law enforcement time and resources to patrol and regulate the fishery.

I thank you for considering the overall situation and allowing a fair and reasonable resolution for the public to harvest a portion of these sockeye legally.

Trooper Marc Cloward
Alaska Wildlife Troopers
Seward Post

Coastal Villages Region Fund

711 H Street, Suite 200 • Anchorage, Alaska 99501 • Phone 907.278.5151 • Fax 907.278.5150

RC23

November 12, 2007

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526
Fax: 907-465-6094

Re: Alaskan Opposition to Proposal 397

Dear Members of the Board of Fisheries:

Coastal Villages Region Fund (CVRF) opposes Proposal 397, which would impose a 60-foot size limit on vessels participating in the Aleutian Islands District state-water Pacific cod fishery. We oppose this proposal because we participate heavily in this fishery through our ownership (46%) of the KATIE ANN, which relies on delivery volumes of Pacific cod from vessels larger than 60'. CVRF is also a part owner of the FORUM STAR, a catcher vessel that would be eliminated from the fishery by Proposal 397.

CVRF: By way of background, CVRF is an Alaska non-profit company that represents 20 Alaska communities and 9,000 Alaskans who reside along the coast of the Bering Sea from Scammon Bay to Platinum. Our 20 member villages (Scammon Bay, Hooper Bay, Chevak, Newtok, Tununak, Toksook Bay, Mekoryuk, Nightmute, Chefornak, Kipnuk, Kwigillingok, Kongiganak, Tuntutuliak, Napakiak, Oscarville, Napaskiak, Eek, Quinhagak, Goodnews Bay, and Platinum) are among the poorest in Alaska. A major glimmer of economic hope for our people has been our investments in the Bering Sea and Aleutian Islands groundfish fisheries. For the first time in history, our residents have a stake in the large-scale groundfish fisheries happening off our shores. These investments provide jobs for our people, new in-region economic development, markets for our local salmon and halibut fleets, scholarships and training for our people, and hundreds of employment opportunities at plants within our communities.

Decreased Quality: The catcher/processor KATIE ANN is an important investment to CVRF in this regard. It is also an important investment to the residents of St. Paul who own around 4% of the vessel through their CDQ group, Central Bering Sea Fishermen's Association. We produce the highest-quality Pacific cod fillets that are available on the market using the KATIE ANN. We do so by processing the fish at sea within hours of the harvest. We cannot produce the same highly specialized deep-skin shatterpack fillets in any other way, nor can the proponents of Proposal 397. Bringing the fish to shore on smaller vessels will decrease its quality as compared to our operation – quality differences that translate into fewer dollars in the market. With the

KATIE ANN's operation, we are maximizing the value of the Pacific cod resource for the Alaskans in our communities and for the crew who work aboard the KATIE ANN, of which 20 were Alaskans in 2007.

Harm to Alaskans: Proposal 397 would harm CVRF and the KATIE ANN's operations by reducing the volume, the pace, and most importantly, the reliability of the supply of Pacific cod delivered to the KATIE ANN. Our operation and machinery require a consistent volume for efficiency and viability. Even the larger catcher vessels are challenged at times in this fishery by weather and ocean conditions. The supply of cod from smaller vessels would be jeopardized by the treacherous and unpredictable weather commonly experienced in the Aleutian Islands. Downtime and reduced supply of cod to our factory would result in lower production, reduced product quality, decreased revenue, lower crew wages, and an erosion of the return on investment for our Alaska communities and residents. We have invested in the KATIE ANN in reliance on her ability to participate in the fishery under the existing rules. The proponents of Proposal 397 fail to mention in their questionnaire that the "mothership" their proposal would hurt worst is owned by Alaskans. We urge you not to stamp out our ***existing***, successful Alaskan-owned operation in order to provide ***potential*** opportunities for smaller vessels that might NOT be owned by Alaskans, might not materialize, and probably cannot produce the volume or supply consistency needed by our existing Alaska-owned operation.

Competition: Limiting the fishery to vessels 60' or less will reduce, or more likely eliminate competition among processors, because the only processor likely able to remain in the fishery would be the existing processor in Adak. The KATIE ANN has not utilized catcher vessels smaller than 60' for cod operations, and as mentioned above, it is unlikely that we could maintain the volume and harvest/delivery consistency needed for our operation with smaller vessels. The Pacific cod fishery has been overcapitalized for years, and many of the existing cod harvesting vessels are owned by Alaskans, including CVRF. We do not need more competition on the harvesting side of the fishery. We need to be able to continue to receive cod from the larger vessels that have made our investment in the KATIE ANN viable and beneficial for Alaskans.

Conservation: The KATIE ANN carries two independent, NMFS-certified observers at all times, while vessels under 60' have no observer coverage at all. The continued participation of the KATIE ANN in the fishery will provide the highest confidence possible in the monitoring and accounting of harvest and bycatch amounts in the fishery. We are also able to move with the harvesting vessels to where cod stocks are most abundant, minimizing the possibility of localized depletion.

Thank you for your consideration of these comments and of CVRF's opposition to Proposal 397.

Sincerely,

Morgen Crow - Executive Director
COASTAL VILLAGES REGION FUND

RC 24

proposal 397: OPPOSE

Board Members:

The owners, captain, and crewmembers of the 115 ft. f/v Kodiak wish to express our concern over proposal 397. This would cause severe financial hardship for our vessel. We participated in the AI state water cod fishery this yr and plan to continue to do so in the future. The AI state water fishery was a big part of our business plan when we bought the vessel in December 2006. Cod potting is the only directed fishery that we paricipate in. This is also important for me personally as I lost my job as a captain of a Bering sea crab vessel due to rationalization of that fishery. And have now bought a vessel so that I can continue to do the only thing I know. Needless to say I can't afford to lose this also. Everything I have is tied up in the Kodiak. Thank you for hearing our concerns.

Cordially

Gunnar Laxfoss

R·C #25

RC 25

Responses to Steller Sea Lion Mitigation Committee Questions on BOF Proposal # 396 – AI State Water Pollock

Prepared by dave fraser – Adak Fisheries

The BOF decision under proposal #396 is whether to close the state water fishery or leave it open. Alternatively the BOF might reduce the 3,000 ton catch limit and further restrict where and when fishing could occur. The BOF could consider a GHL for just Kanaga Sound, based on a 14.27% exploitation rate applied to the 7,956 tons survey biomass for that block which would produce a local GHL of about 1135 tons.

Last year NMFS did an EA and Biological Opinion on an EFP for harvest of up to 3,000 tons in the area from 173-179 longitude. The EFP allowed fishing in the portions of statewater between 174-178 longitude that would be open in the fishery addressed by proposal #396.

That Biological Opinion addressed most of the questions posed by the SSLMC and found no jeopardy or adverse modification, so long as harvest was limited to 1000 tons in any one degree of longitude.

Notes on Board of Fish Proposal #396 and SSLMC "Objectives Questions"

1. Continue to avoid jeopardy and adverse modification.

- Is there additional fishing effort inside of SSL critical habitat?

Absent the statewater fishery, there is currently no directed pollock fishery inside AI SSLCH.

- Does the proposal provide trade-offs that reduce the total negative effects to SSL?
- Does the proposal open a substantial amount of critical habitat?

No.

The proposal only allows pollock fishing between 174 to 178 longitude inside that portion of state water that is not inside 3 miles from a haulout or 20 miles of a rookery. Given the bathymetry in that area, only a very small percent of the open area of state water would actually be subject to any pollock fishing. NMFS staff (Steve Lewis) could do a GIS analysis of the intersection of fishable depths, state water and SSL CH, which would probably show that less the 1% of AI SSL CH would be open to pollock fishing.

- Does proposal indirectly provide protection to additional sites?
- Does proposal indirectly affect nearby SSL sites?

There are SSL sites in the region. The affects were described in the NMFS EA and Biological Opinion on the 2007 EFP fishery.

- Does proposal affect important research site? (e.g. Chiswell)
- Does proposal offer additional measures to control fishing rate or effort?

Yes.

Fishing is limited to vessels 58' or less. There is also a limit on total removals (3000 tons) that is substantially less than the AI pollock ABC (19,000 tons). However, the statewater GHL does not contain the sub-area limitation that was included in the 2007 EFP.

The BOF could further reduce the amount of the state water GHL based on the 2007 survey of Kanaga Sound.

The preliminary results of the survey indicate roughly 7,956 tons of pollock biomass in Kanaga Sound. Thedraft stock assessment indicates total AI pollock biomass of 197,280 tons and an ABC of 28,160 tons which equates to an exploitation rate of about 14.27%.

The BOF could consider a GHL for just Kanaga Sound based on a 14.27% exploitation rate applied to the 7,956 tons survey biomass for that block which would produce a local GHL of about 1135 tons. This would be consistent with the Biological Opinion produced for the 2007 EFP fishery.

One further precautionary step would be to limit the statewater GHL to 40% of the 1135 tons for the A season.

- Does the proposal reduce the no-fishing time between end of year (December) and first of year (January) fisheries at a critical time for SSL?

The proposal does not open the statewater pollock fishery until March 1st. It expands the winter closure.

- Does the proposal affect the number of fishing days required to harvest the quota?

No.

The AI pollock TAC is currently un-harvestable given the total closure of SSL CH. Allowing a small GHL in a limited portion of statewater will not result in the TAC being attained.

2. Encourage development of a sound experimental design for monitoring.

NA

3. Minimize adverse social and economic impacts.

- Does the proposal provide economic benefits?

Yes.

Little, if any, AI pollock will be harvested under federal regulations until modifications are made to the total closure of SSL CH. Any pollock harvested in a statewater fishery provides economic benefit that would not otherwise be provided. These benefits would accrue to the participating harvesters, to the processing plant and to the community of Adak.

Beyond that direct value of a small amount of harvest from a statewater pollock fishery, this would be the 1st opportunity for 58' boats to test their equipment against AI pollock fishing conditions which differ substantially from what they are familiar with in the WGOA.

Because the sizes of AI pollock are substantially larger than what is typical in the Bering Sea the processing plant invested in specially designed processing machines last year to handle the larger sized pollock. This equipment did not perform as well as hoped and has been modified by the manufacturer. A small statewater fishery would provide an opportunity to further test and refine the equipment.

- What is the impact upon harvesting and/or processing efficiency?

Harvesters with small (<60') vessels would have an opportunity to catch pollock.

- Does the proposal have any effects on other fisheries?

No.

- Will the proposed action be further affected by recent or pending council actions?

No – except to the extent it provides a limited fishery that would be superceded when the new Biological Opinion is completed and SSL mitigation measures are restructured.

4. Minimize bycatch of PSC and other groundfish.

- Does the proposal potentially create bycatch issues in other SSL prey species?
- Does the proposal potentially create bycatch issues in PSC species?

No bycatch impacts are likely to occur. (see 2007 EFP EA/Biop)

5. Promote safety at sea.

- Does the proposal reduce or increase safety for the fleet?

State waters are much safer for small vessels than the area outside CH, 20 miles from SSL sites.

6. Minimize adverse impacts to threatened and endangered species in the BSAI and GOA

A state water pollock fishery in the AI is unlikely to impact any other endangered species. (see 2007 EFP EA/Biop)

RC. #26

RC26

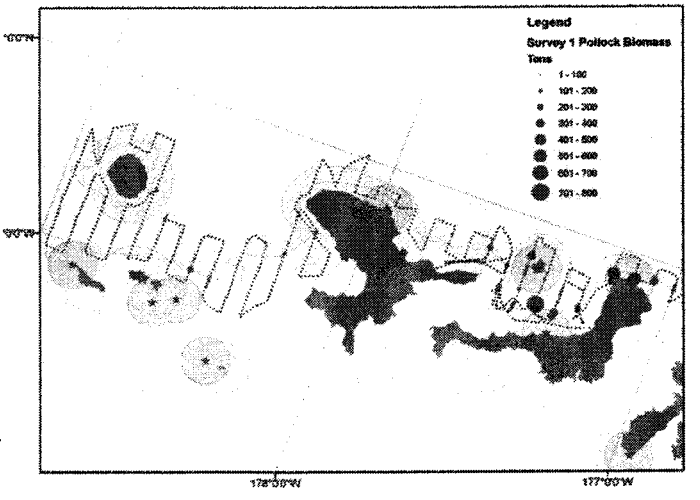
BOF Proposal 396

Review of Aleutian Island Statewater Pollock Fishery

Comments by dave fraser – Adak Fisheries

2007 AICASS Kanaga Sound Survey

(from Steve Barbeaux's presentation to October BOF Work Session)



AICASS 2007 Biomass and Total Catch by Area

Survey 1 Total – 16,178 tons pollock

- Adak
  - 1057
- Delarofs
  - 1301
- Atka Flats
  - 1750
- Knoll
  - 3023
- Other
  - 1092
- ***Kanaga***
  - ***7956***

2008 Aleutian Island Draft Stock Assessment

Model 2B Projected 2008 biomass

- Age 3+ biomass = 197,280 tons
- Female spawning biomass = 82,250 tons

Maximum permissible ABC:

- ~~Tier 3a Model 2B *F40%* = 0.196 yield = 28,160 tons~~

(ABC/Age 3+ Biomass) = (28,160/197,280) = **14.27%**

2008 GHL Proposal for AI Statewater Pollock

Kanaga Sound GHL Proposal

- 2007 Survey 1 Biomass for Kanaga = 7,956 tons
- Tier 3a exploitation (ABC/Age 3+ Biomass) = 14.27%
- 14.27% x 7,956 tons = 1,136 tons
- 40% A season portion (40% x 1,136) = **454 tons**

Kanaga Sound GHL Proposal relative to Proposed AI ABC

- AI 2008 ABC = 28,160
- Kanaga Sound GHL Proposal = 454 tons
- Ratio: (454/28,160) = **1.61%**

Previous AI Pollock Catch in Kanaga Sound

% of Federal AI Pollock Harvest Taken from Statewater in Kanaga Sound (from attached figures in Sept. 17th 2007 NMFS letter to BOF)

- 1995 = 6.3%
- 1996 = 9.8%
- 1997 = 8.6%
- 1998 = 4.8%
- 1999 = 4.8%

% of 2008 Federal Pollock ABC Proposed for Kanaga Sound GHL

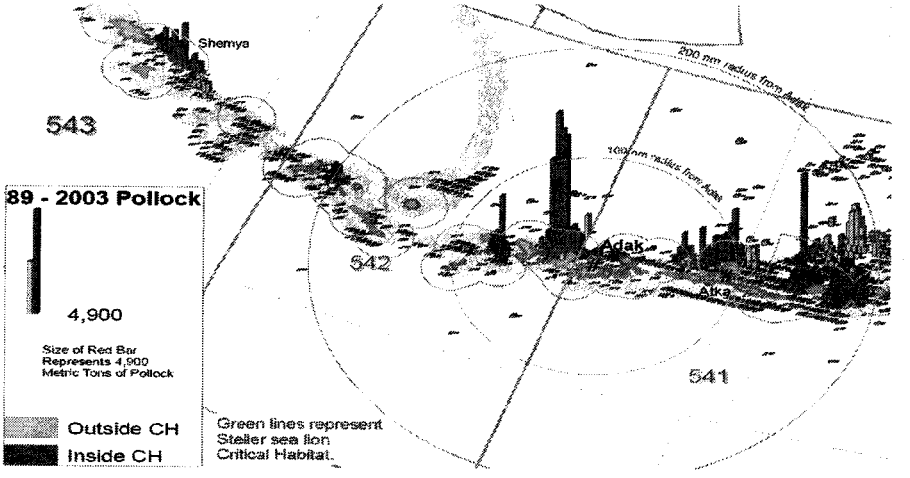
- 2008 -1.61%

AI Pollock ABC, Catch and Biomass by Year

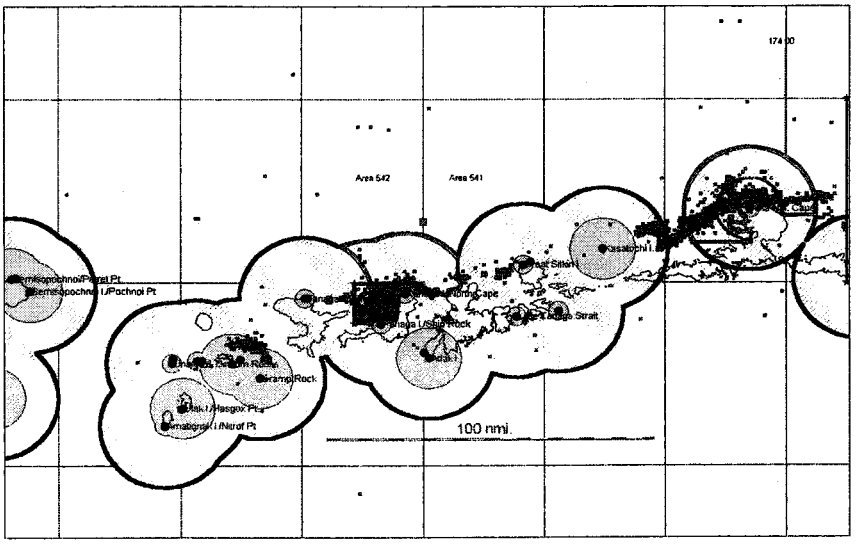
YEAR	ABC	CATCH	Model 2B Biomass
1991	101,460	98,604	325,990
1992	51,600	52,352	332,730
1993		57,132	322,450
1994	56,600	58,659	301,120
1995	56,600	64,925	291,530
1996	35,60	29,062	225,690
1997	28,000	25,940	202,520
1998	23,800	23,822	173,680
1999	23,800	1,010	152,910
2000	23,800	1,244	162,100
2001	23,800	824	173,490
2002	23,800	1,156	194,850
2003	39,400	1,653	209,430
2004	39,400	1,150	216,120
2005	29,400	1,556	218,980
2006	29,400	1,736	218,400
2007	44,500	2,359	

(source- 2008 Draft AI Pollock Stock Assessment Tables 1A.1 & 1A.22)

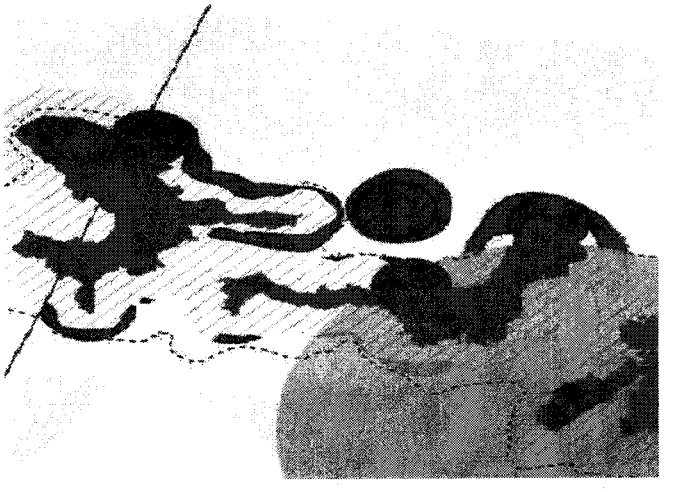
Historic AI Pollock Catch Data



Historic AI Pollock Catch Data



State Waters in Kanaga Sound Deeper than 100 Meters



RC#27

RC27

Discussion paper - prepared by dave fraser

Consultation on Aleutian Island Statewater Pollock

NMFS Protected Resources may be asked for an opinion on whether the 3000 metric ton pollock state water fishery between 174° W and 178° W longitude will result in Jeopardy or Adverse Modification of Steller sea lion (SSL) Critical Habitat.

The answer to the question rests in part upon an analysis of whether there is competitive limitation of SSL foraging success.

Competition that limits SSL foraging success for pollock in the Aleutian Islands (west of 170° W longitude) would require the existence of overlap in multiple dimensions.

1. Is the fishery target species (pollock) an important SSL prey species in the region?
2. Will fishery removals of pollock substantially reduce overall prey biomass?
3. Are the fishery removals of pollock the same sizes consumed by SSL?
4. Does the fishery occur in the same depths as SSL foraging depths?
5. Is the fishery's spatial distribution the same as the SSL foraging spatial distribution?

For competitive limitation to occur, it is necessary for overlap to take place in more than one dimension. For example, if there was an unlimited biomass of pollock and it rarely occurred in the diet of SSL, overlap in sizes consumed or overlap in depths of foraging and fishing would be of little importance. Similarly, if the spatial distribution didn't overlap, then overlap in depth would be of little importance.

The answers to the five questions are unlikely to be simple "yes/no" answers. Degree of overlap needs to be considered in each of the dimensions. Logically, small degrees of overlap are less of a concern than large degrees of overlap.

This discussion paper looks at each of the five questions.

Is the fishery target species (pollock) an important SSL prey species in the region?

Two major studies have been conducted on SSL scat in the AI, one covering 1990-1998 (Sinclair and Zeppelin 2002), and the other covering 1999-2005 (NMFS 2006b)

The 1990-1998 study found 15 other prey species in SSL scat in the Central/Western Aleutians (Region IV) in winter with equal or greater frequency of occurrence than pollock.

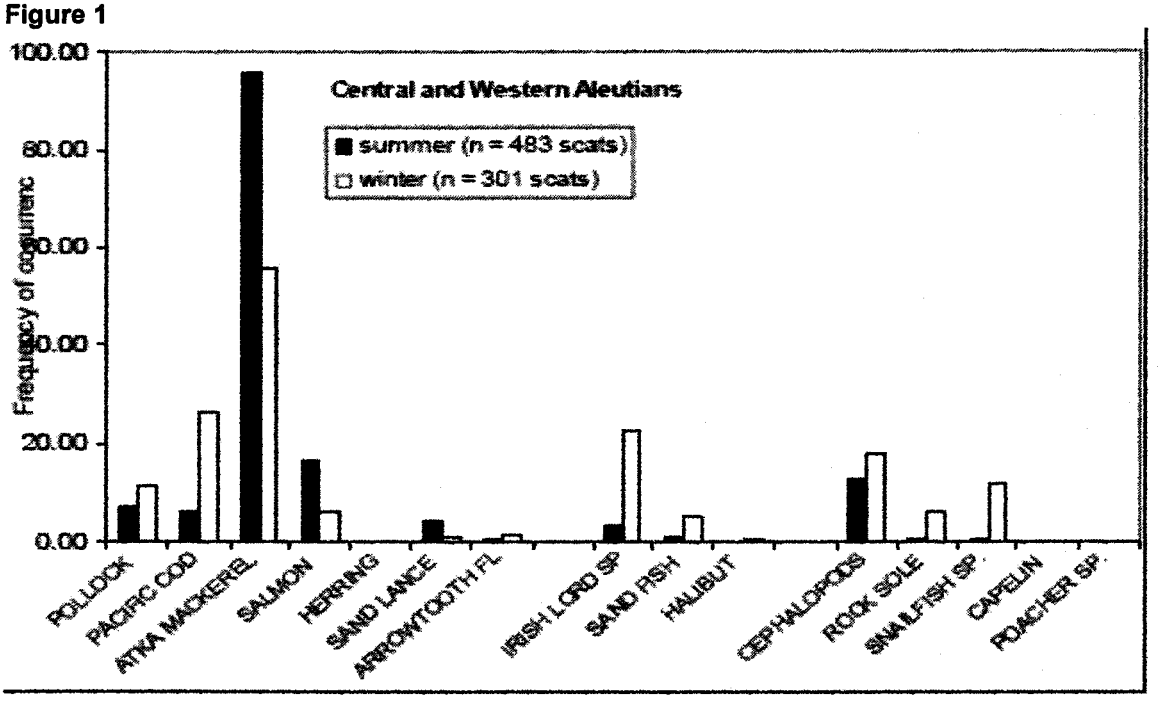
The following tables are condensed from Table 2 in Sinclair and Zeppelin and from Table 3.21 in the draft BiOp.

Table 1

from Sinclair and Zeppelin 2002			from NMFS 2006b	
Prey Species	**FO in Scat**		**Prey Species**	**FO in Scat**
Atka Mackerel	64.9%		Atka Mackerel	55.0%
Pacific cod	16.9%		Pacific cod	26.0%
Salmon,	23.6%		Irish Lords,	23.0%
Rock Greenlings,	21.6%		Cephalopods,	18.0%
Irish Lords,	12.8%		Snailfish,	12.0%
Snailfish,	11.5%		***Pollock***	***12.0%***
Cephalopods,	11.5%		Salmon,	6.0%
Kelp Greenlings,	4.1%		Rocksole,	6.0%
Other Greenlings,	3.4%		Arrowtooth	1.0%
Other flatfish	3.4%		Rock Greenlings,	na
Rockfishes,	3.4%		Kelp Greenlings,	na
Lumpsuckers,	2.7%		Other Greenlings,	na
Gunnels,	2.7%		Other flatfish	na
Rocksole,	2.7%		Rockfishes,	na
Arrowtooth	2.7%		Lumpsuckers,	na
Pollock	***2.7%***		Gunnels,	na

The following figure is take from the Central/Western Aleutian Island portion of figure 3.20 in the September 7, 2006 draft Biological Opinion.

Figure 1



Will fishery removals of pollock substantially reduce overall prey biomass?

Pollock is a relatively minor diet item for SSL in the AI. As shown in the scat data, at least fifteen other species are also present in the SSL diet.

Aleutian Island biomass estimates are available from the SAFE documents for some alternative prey species. However, for many of the prey species in the above table there are no biomass estimates available for the AI.

The combined AI biomass of 3 prey species for which separate estimates are available (Atka mackerel, P. cod, and POP) sum to roughly one million metric tons.

AI pollock biomass estimates are presented in the table below:

Table 2

Aleutian Island Pollock Biomass	
AI Pollock 2007 biomass (model 1 2006 SAFE)	141,000 tons
AI Pollock2007 biomass (model 2A 2006 SAFE)	363,000 tons
AI Pollock biomass (2006 bottom trawl survey)	94,000 tons
AI Pollock 2007 ABC	44,500 tons
AI Pollock 2007 TAC	19,000 tons
Pollock statewater GHL	3,000 tons

The statewater GHL accounts for between 1% to 3% of the estimated pollock age 3+ biomass. This is far less than 1% of the overall biomass of prey species for which AI biomass estimates are available, and even less when other prey species are considered.

Are the fishery removals of pollock the same sizes consumed by SSL?

A paper by Zeppelin et al. 2004, presents a comparison of pollock and Atka mackerel sizes consumed by SSL and taken in commercial fisheries. The mean size of pollock consumed by SSL was shown to be 39.3 centimeters in that study. The mean size of pollock harvested by the commercial fishery was approximately 50 centimeters. The study estimated that there was a 56% overlap in the sizes of pollock harvested in the commercial fishery compared to those consumed by SSL.

This estimate of overlap does not reflect the overlap in the Aleutian Islands. Few, if any, of the pollock taken by the commercial fishery were harvested in the Aleutian Islands. This is due to the overwhelming dominance of Bering Sea hauls in the observer data base and that the directed pollock fishery was closed beginning in 1999.

The size composition of pollock in commercial harvests in the AI tends to have a much higher mean size than the pollock harvested in the Bering Sea or Gulf of Alaska. During the 2006 Aleutian Island Cooperative Acoustic Survey Study, size data was collected by Steve Barbeaux from the pollock harvested. The mean size of pollock in the AICASS

study was approximately 58 centimeters. The overlap for commercial pollock fisheries in the Aleutian Islands is substantially less than that presented in Zeppelin et al 2004.

The draft Biological Opinion presents a figure 3.21 taken from Zeppelin et al. 2004, portraying the overlap in sizes of pollock consumed by fisheries. The figure is presented below together with a graph of the pollock harvested in the 2006 AICASS study.

Figure 2

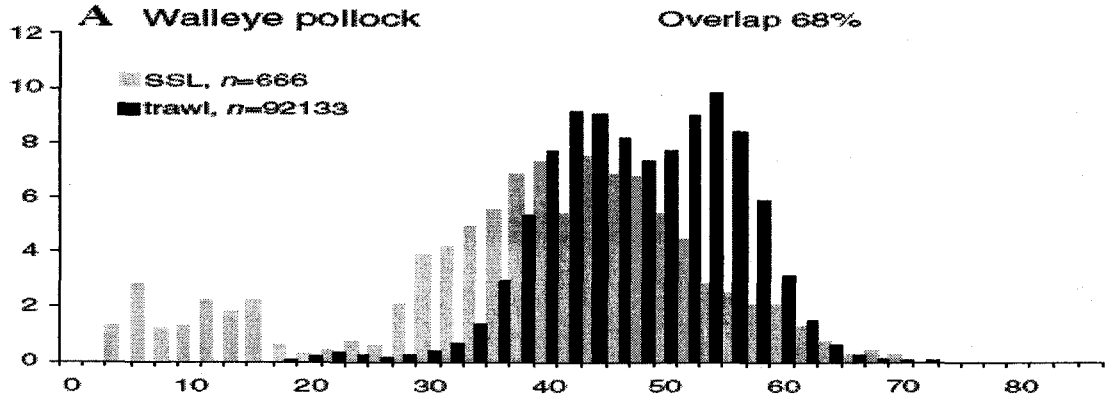
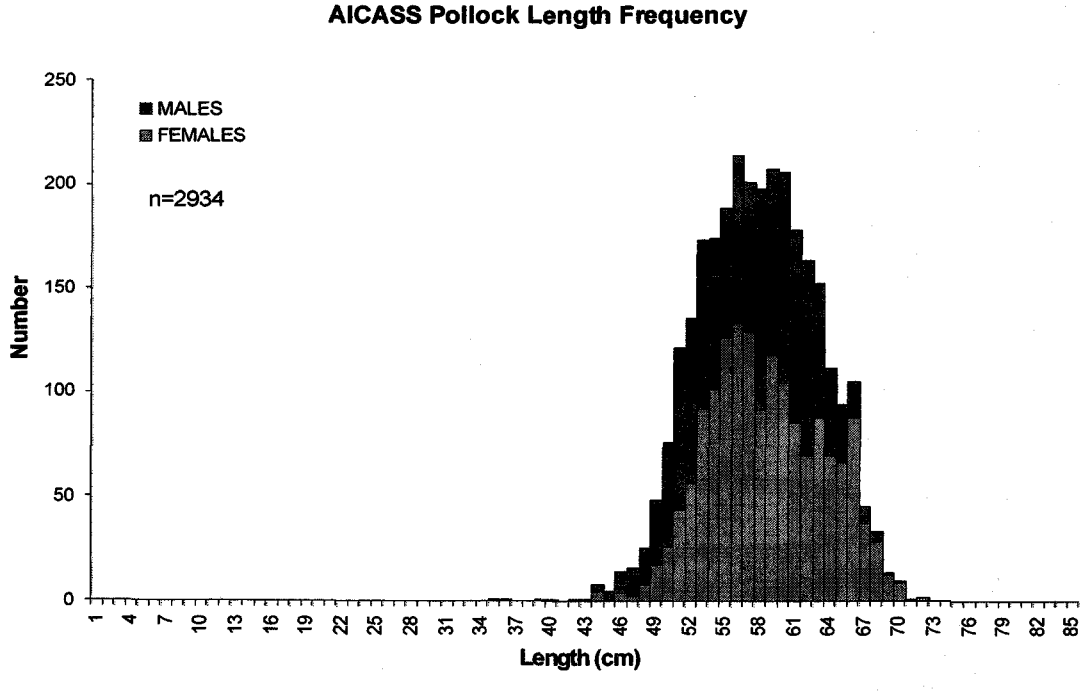


Figure 3



Does the fishery occur in the same depths as SSL foraging depths?

The draft Biological Opinion (Sept. 7th, 2006) presents summary data on SSL dive depths from several studies in table 3.13.

Table 3

Steller Sea Lion Dive Depths for Dives Greater than 4 Meters - from table 3.13, draft BiOp 9/7/06	
Mean dive depth in winter of adult female SSL (Alaska)	24 meters
Mean dive depth in summer of adult female SSL (Russia)	53 meters
Mean dive depths of juvenile SSL (4 studies)	13 to 39 meters
Mean Maximum dive depth of juvenile SSL (Washington)	144 meters
Mean Maximum dive depth of juvenile SSL (Alaska)	63 meters
Maximum dive depth in winter of adult female SSL (Alaska)	>250 meters
Percentage of dives deeper than 155 meters by adult female SSL in winter	4%
Percentage of Pollock trawls deeper than 200 meters in Kanaga Sound	80%

While the summary table only presents mean and mean maximum dive depths, some of the underlying papers provide dive data by depth bins which allows further examination of the degree of overlap between commercial fishing depths and SSL dive depths.

SSL dive information from two studies - "Diving Behaviour of Adult Female Steller Sea Lions in the Kuril Islands, Russia," Loughlin, 1998, (Table 3, page 28) and "ADF&G Wildlife Technical Bulletin No. 13," May 1996, (Table 2, pg. 144) - was used to examine potential overlap between SSL foraging depths and commercial pollock fishing depths in the Aleutian Islands.

The data on SSL dives depths from these studies was used to plot the cumulative proportion of dives deeper than a given depth.

An examination of NMFS observer program data (provided by Ren Narita at ASFC) for 4800 hauls in the Aleutian Island pollock fishery between 1990 and 1998 found less than 5% of pollock trawl hauls shallower than 150 meters

Two subsets of these hauls were plotted for the areas where most harvest under the EFP is expected - one in the Kanaga Sound area and one in the Atka Island/North Cape area. Less than 5% of the hauls in the Atka area were shallower than 150 meters, and more than 50% were deeper than 350 meters (figure 4). The Kanaga area was used to plot the cumulative proportion of trawl hauls for pollock shallower than a given depth in that area (figure 5).

The plots of SSL dives and trawl hauls cross at approximately 150 meters. About 5% of SSL dives (excluding dives less than 4 meters) exceeded 150 meters, while less than 10% of Aleutian Island pollock hauls in Kanaga Sound were shallower than 150 meters.

Figure 4

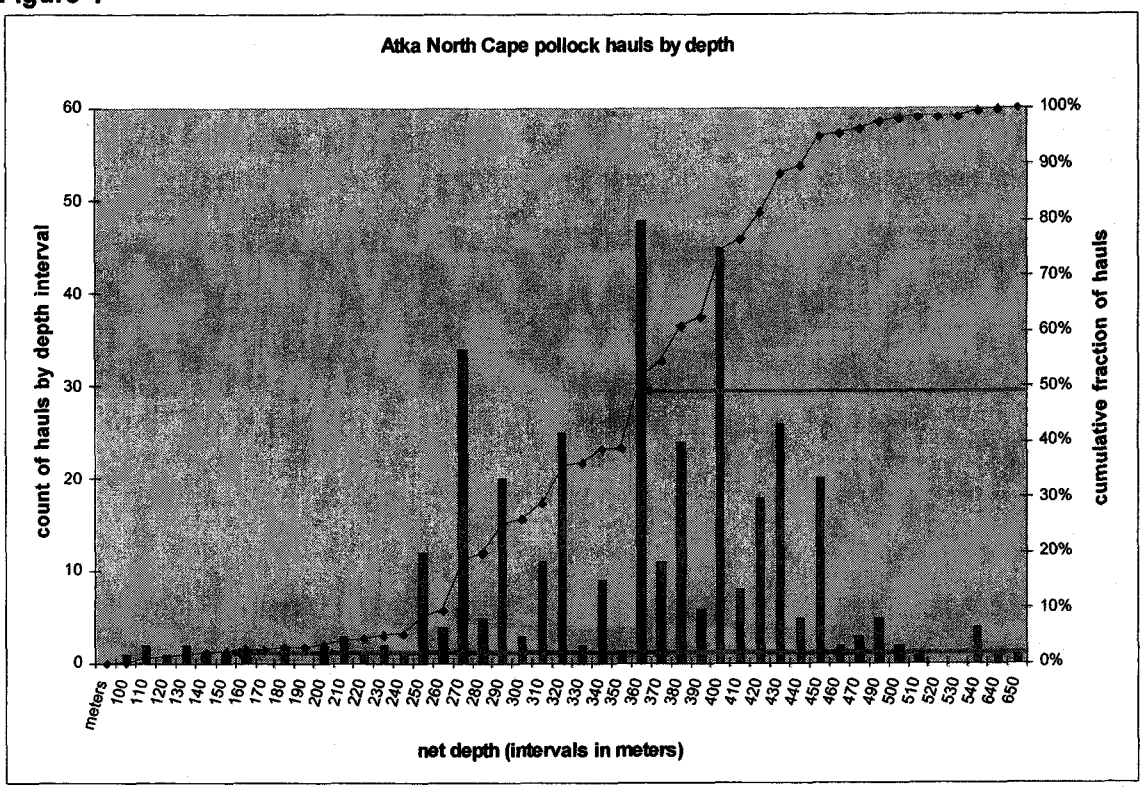
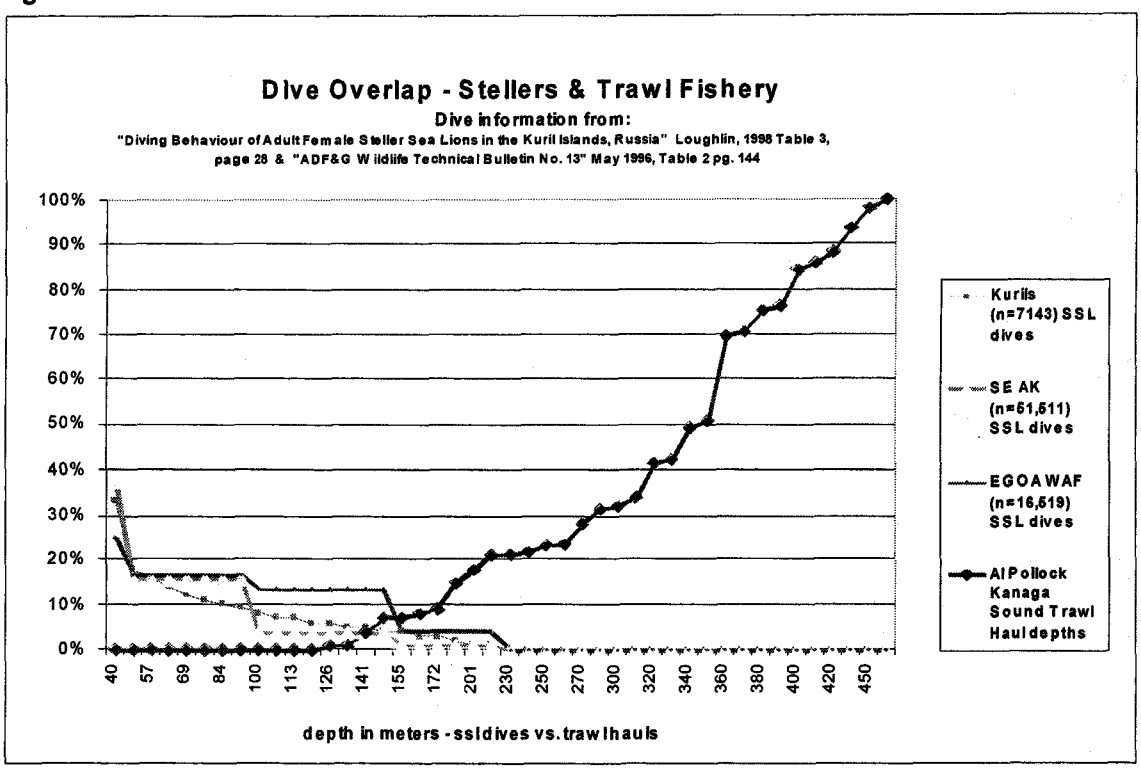


Figure 5

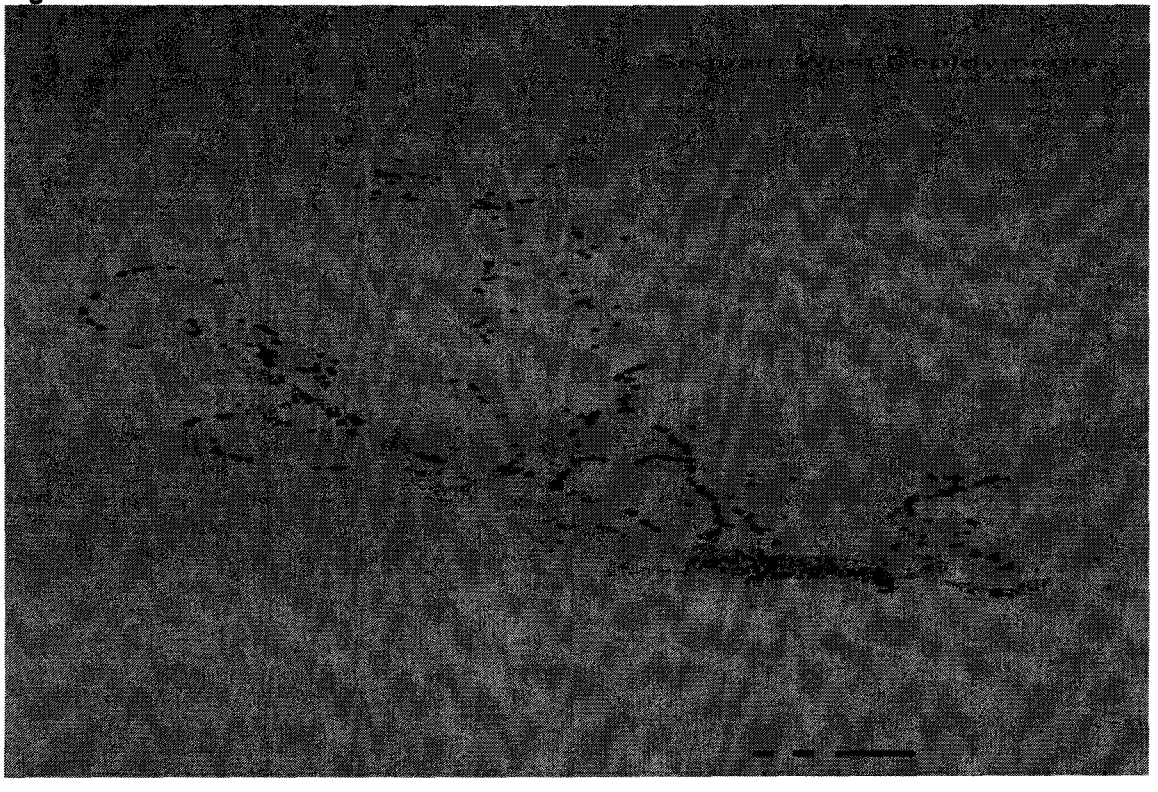


Is the fishery's spatial distribution the same as the SSL foraging spatial distribution?

The best source of information on SSL foraging distribution is the satellite telemetry data. In February of 2000, four SSL were tagged at Seguam Pass. In April 2005 fifteen SSL were tagged in the Adak area. The data from these two sets of deployments are available to be viewed on line.

The draft Biological Opinion (September 7th 2006) presents an overview map (figure 3.19) of the data from all of these deployments. Given the scale of the map in the figure it is difficult to draw many inferences. However it is clear that at least some SSL spend a significant amount of time outside the 1000 meter isobath, well beyond the continental shelf.

Figure 6



As Bowen, et al, (September 2001) noted, "Data on SSL dive depth would be more useful if they were linked to bathymetry such that one could then estimate the fraction of benthic habitat available to different age and sex-classes."

In the final report by Bowen, et al, the authors discussed the use of satellite telemetry data. The panel stated (pg.35), "It should also be recognized that the appropriate sampling unit in these studies is the individual."

With the GIS tools available from the "Alaska Ecosystem Program Telemetry Research Page" (http://nmml.afsc.noaa.gov/AlaskaEcosystems/sslhome/satellite/default.htm) it is possible to view the 19 Aleutian Island satellite tag deployments individually and to "zoom in" to a fine local scale.
GIS maps of the Seguam Pass deployments are at:
http://afscmaps.akctr.noaa.gov/website/seg2000feb/viewer.htm
GIS maps of the Adak deployments are at:
http://afscmaps.akctr.noaa.gov/website/eal2005apr/viewer.htm

By looking at fine scale maps it becomes clear that the vast majority of satellite "hits" occur inside the 100 meter isobath. *(Unfortunately, the image capture function of ArcView software didn't seem to work – the reader will have to go on line and "zoom in" on the various deployments to view the area covered by the EFP in discreet segments.)* This is consistent with the dive data presented in the several studies referenced in the draft Biological Opinion (September 7th, 2006) indicating that the vast majority of dives are shallower than 100 meters.

Figure 7, (from Halflinger and fraser, 2001) below traces the movement of SSLID74, an 11 month old male pup, during period from 5/28 to 6/10. It is an example of a foraging trip well beyond the continental shelf.

During this time he wanders offshore far past the continental shelf break, then circles back to the west, making landfall at the west end of Atka Island, then he follows closely along the shoreline heading east for a few days, and finally heads back out past the shelf break again. He shows no interest in the portion of the shelf between 100 and 200 meters where commercial groundfish are targeted. Rather he appears to be foraging where the more likely prey is salmon, mictophids, and squid.

There is no indication of spatial overlap or temporal overlap with the cod and Pollock fishery which are winter fisheries, since this animal doesn't begin going offshore until summer.

The same animal is shown in figure 8 (also below) during the winter months from March through May when it rarely goes beyond the 100 meter isobath

This image in figure 8 zooms in on SSLID74, the male pup from figure 7, at Seguam Island. All at-sea locations from the time of tagging (2/29/2000) for the next 2 months (until 5/4/200) are contained in this image, and only one location during that period is significantly outside 3 miles.

Figure 7

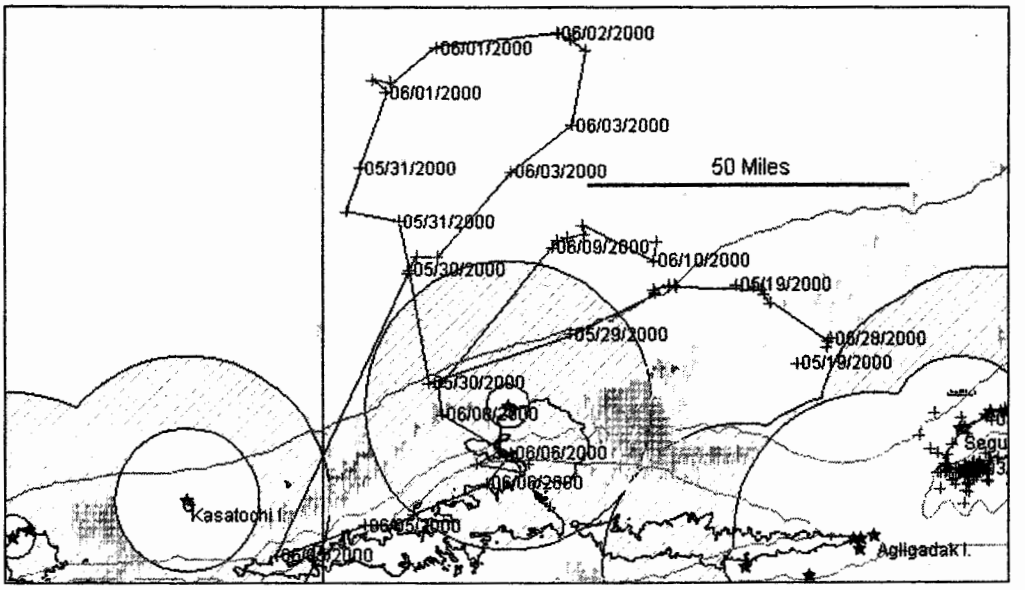
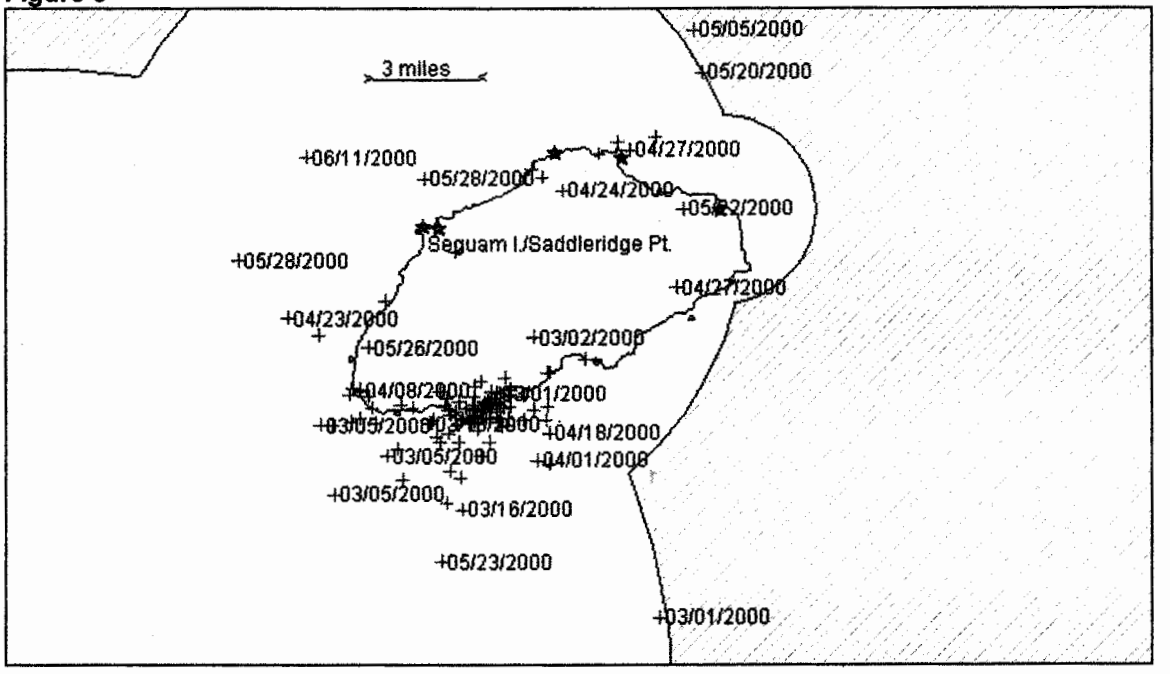


Figure 8



These two patterns noted above can be seen for each of the 19 deployments when viewed online. Three SSL make long offshore trips. The remainder of the satellite "hits" are almost exclusively found inside the 100 meter isobath. It is evident from the telemetry data that there are two modes of SSL spatial distribution in the Aleutian Islands. One mode is long trips far beyond the continental shelf edge. The other mode appears to be "beach-combing" very close to shore, inside 100 meters.

Given the narrow shelf in the Aleutian Islands, spatial separation between SSL foraging locations and commercial pollock fishing activity may not be dramatic when measured in miles. However, when "data on SSL dive depth" is "linked to bathymetry" and examined by "individual," as suggested by Bowen, et al, it become clear that there is significant 3 dimensional spatial separation that is tied to bathymetry.

Conclusion

The picture that emerges from consideration of the data related to the multiple dimensions of overlap is not one that suggests competition with pollock fishing in the Aleutian Islands limits SSL foraging success.

In contrast to the conclusions of Sinclair and Zeppelin, which may be valid in the context of the Bering Sea or Gulf of Alaska, there is nothing in the Aleutian Island data that suggests spawning aggregations of pollock are an important target species for Aleutian Island SSL. Rather it appears that dispersed pollock form a minor opportunistic component of the prey field in the Aleutians (west of 170° W longitude). The fishery is separated in space both vertically (depth) and horizontally (distance from shore and bathymetry). Finally, to the minor degree that pollock are part of a much larger SSL prey field, the sizes of pollock harvested by the fishery are significantly larger than those consumed by SSL.

Each of the five dimensions of overlap examined show a very limited degree of overlap. Taken together, it is difficult to imagine that pollock fishery in the Aleutian Islands harvesting the full TAC, let alone 3000 metric tons, occurring 3 miles or more from listed SSL sites would result in either Jeopardy or Adverse Modification of SSL Critical Habitat.

Literature Cited

Barbeaux, Steve. 2006 Draft Aleutian Islands Cooperative Acoustic Survey Study. *in press.*

Bowen, W. D., H. Harwood, D. Goodman, and G. L. Swartzman. 2001. Review of the November 2000 Biological Opinion and Incidental Take Statement with respect to the western stock of the Steller sea lion. Final Report to the North Pacific Fisheries Management Council, May, 2001.

Haflinger, K., Fraser, D., 2001. Expanded Analysis of Telemetry Data, Comment on August 2000 DSEIS. Submitted by High Seas Catchers' Co-op.

Haflinger, K. 2003. An analysis of juvenile foraging telemetry data binned 0-3, 3-10, 10-20 nm, and >20 nm, provided as further comment on the draft supplement. Provided by the NPFMC.

NMFS. 2001. Endangered Species Act, Section 7 Consultation Biological Opinion and Incidental Take Statement on the authorization of the Bering Sea/Aleutian Islands and Gulf of Alaska Groundfish Fishery Management Plan Amendments 61 and 70. NMFS Alaska Region, Protected Resources Division, Juneau, AK.

NMFS. 2006a. Draft Steller sea lion recovery plan: eastern and western distinct population segments (*Eumetopias jubatus*). NMFS Office of Protected Resources, Juneau, AK.

NMFS. 2006b. NMFS response to questions posed in a March 13 letter to Doug DeMaster, Sue Salveson, and Steve Davis from Robert D. Mecum. NMFS Office of Protected Resources, Juneau, AK.

NMFS. 2006c. Endangered Species Act, Section 7 Consultation Biological Opinion on the authorization of and experimental fishing permit for pollock in the Aleutian Islands area. NMFS Alaska Region, Protected Resources Division, Juneau, AK.

NMFS Observer Program - Ren Narita - Observer data

NPFMC. 2006. Stock Assessment and Fishery Evaluation Report for the Groundfish Resources of the Bering Sea and Aleutian Islands Regions. Compiled by the Plan Team for the Groundfish Fisheries of the Bering Sea and Aleutian Islands. North Pacific Fishery Management Council, 605 W 4th Ave, Suite 306, Anchorage, Alaska, 99501. November 2006.

Sinclair, E., and T. Zeppelin. 2002. Seasonal and spatial differences in diet in the western stock of Steller sea lions (*Eumetopias jubatus*). J. Mammal. 83(4):973-990.

Zeppelin, T. K., D.J. Tollit, K.A. Call, T.J. Orchared, and C.J. Gudmundson. 2004. Sizes of walleye pollock (*Theragra chalcogramma*) and Atka mackerel (*Pleurogrammus monopterygius*) consumed by the western stock of Steller sea lions (*Eumetopias jubatus*) in Alaska from 1998 to 2000. Fish. Bull., U.S. 102(3):509-521.